Lewisham Local Plan

Proposed submission document – Regulation 19 stage

(Text only version. ~~excluding~~ Part Three - Site Allocations are located at the end of this document)

Informative

This Lewisham Local Plan 'Proposed submission document' (Regulation 19 stage) has been prepared for consideration by Lewisham's Mayor and Cabinet. It should not be used for the purpose of decisions on planning applications.

Reading this document

This document is presented in 'track-change' mode. It shows changes that are proposed to be made to the Lewisham Local Plan: Main Issues and Preferred Approaches document (Regulation 18 stage). These changes have been informed by public consultation feedback, new technical evidence, the London Plan (2021) and the revised National Planning Policy Framework (July 2021).

The document is best viewed in colour. The changes are shown as follows:

Additions in underline.

~~Deletions in strikethrough.~~

Text that is retained but moved elsewhere in double underline.

Planning officer comments highlighted in ledger note main reasons for changes

Consultation overview

The **Lewisham Local Plan: Main Issues and Preferred Approaches** document is being consulted upon under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

The new Local Plan will establish a future vision for Lewisham, along with the planning and investment framework to deliver this vision over a 20-year period (2020 to 2040). The Local Plan, together with the London Plan and Neighbourhood Plans, forms the statutory Development Plan for Lewisham.

This document sets out the Council's 'preferred approaches' for the overarching spatial strategy as well matters covering a range of policy topic areas, having considered the reasonable alternatives. Where there are reasonable alternatives that have been considered, these are identified within the document. The document sets out the justification for selecting the preferred approaches at this time.

Next Steps

Comments on the Lewisham Local Plan: Main Issues and Preferred Approaches are invited from all those with an interest in the borough.

The Council is also inviting comments on a number of supporting documents which have been prepared to support the Local Plan, as follows: Schedule of Proposed Changes to the adopted Policies Map; Integrated Impact Assessment; Habitats Regulations Assessment; Draft Infrastructure Delivery Plan.

All comments received will be taken into account and will inform the 'Proposed Submission' version of the Local Plan, which will be published for public consultation (Regulation 19 stage). In addition, all comments will be summarised and collated within a Consultation Statement. Respondents will be identifiable by name. Any other personal information will be processed in accordance with the General Data Protection Regulations 2018.

Consultation documents and supporting information can be accessed and viewed online, by visiting https://lewishamlocalplan.commonplace.is or https://consultation.lewisham.gov.uk/planning/localplanconsultation.

When and how to respond

This public consultation on the Lewisham Local Plan: Main Issues and Preferred Approaches document will run from **15 January 2021** to **11 April 2021**.

Comments must be received no later than **11 April 2021**.

The Council encourages the use of our online consultation portals https://lewishamlocalplan.commonplace.is and https://consultation.lewisham.gov.uk/planning/localplanconsultation.

This will enable the Council to better process and acknowledge your feedback.

Written representations can also be submitted by:

~~**Email**~~

~~localplan@lewisham.gov.uk~~

~~**Post**~~

~~Local Plan~~
~~Lewisham Planning Policy~~
~~London Borough of Lewisham~~
~~Laurence House~~
~~1 Catford Rd, Catford, London SE6 4RU~~

Commented [NE1]: Consultation information to be updated for Regulation 19 plan

0 Consultation information

0.1 Consultation overview

The Lewisham Local Plan: Proposed Submission document is being consulted upon under Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

The new Local Plan will establish a future vision for Lewisham, along with the planning and investment framework to deliver this vision over a 20-year period (2020 to 2040). The Local Plan, together with the London Plan and Neighbourhood Plans, forms the statutory Development Plan for Lewisham, and they are used to assess all planning applications across the borough.

This document is the Lewisham Local Plan, as proposed to be submitted to the Secretary of State for independent examination.

0.2 Next Steps

The Council is inviting comments on the soundness of the Lewisham Local Plan: Proposed Submission version from all those with an interest in the borough. Plans are 'sound' if they are positively prepared, justified, effective and consistent with national policy.

The Council is are also inviting comments on a number of supporting documents which have been prepared to support the Local Plan.

All personal information will be processed in accordance with the General Data Protection Regulations 2018.

Consultation documents, supporting documents and information such as further details about the Regulation 19 consultation and an explanation of the test of soundness can be accessed and viewed online, by visiting:

https://consultation.lewisham.gov.uk/planning/reg19consultation

or

https://lewisham.gov.uk/myservices/planning/policy/planning/current-and-future-consultations

Copies of the Lewisham Local Plan: Proposed Submission version can also be inspected in the following places:

Laurence House, Catford

Catford Library

Lewisham Library

Deptford Lounge Library

Forest Hill Community Library

Downham Library

Grove Park Community Library

When and how to respond

The public consultation on the Lewisham Local Plan: Proposed Submission document will run from Wednesday 1st March 2023 to Tuesday 25th April 2023.

Comments must be received no later than 12 midnight on Tuesday 25th April 2023.

You can take part in the consultation by sending us your comments via written representations or by completing the on-line questionnaire.

To make a written representation please do so by submitting to:

Email

localplan@lewisham.gov.uk

Post

Local Plan

Lewisham Planning Policy Team

London Borough of Lewisham

Laurence House

1 Catford Rd, Catford,

London, SE6 4RU

~~Lewisham will continue to be a welcoming place where the culture and diversity of our people, and the unique qualities of local neighbourhoods, is recognised and protected. We will always celebrate what makes us different and have a strong sense of community. We will give people the security and certainty they need so that everyone can live their best lives.~~

~~Lewisham will be a place where all generations not only live but also thrive. A place that people want to visit and live in, and where they choose to stay and enjoy a good quality of life. A place where you can get on, regardless of your background and where you are always treated fairly and are supported to achieve your full potential.~~

~~Lewisham will continue to be a dynamic place, reflecting the strength of its communities, and partnership working with our community remains at our core. We are proud of the vibrancy of our high streets, local businesses, arts and cultural establishments, our evening and night-time economy and our world renowned institutions. We will not only protect them but grow them. We will contribute to and share in more of London's future prosperity, becoming a greener, healthier and more resilient place by leading the way in responding to the global climate emergency.~~

~~Most of all, we want you to love living in Lewisham~~

Commented [NE2]: Preamble deleted – this statement is the Vision for Lewisham, which is included later within Part 1 of the plan

Contents

0 Consultation information – To be completed iii

Part One: Planning for an Open Lewisham 1

1 About Lewisham's Local Plan 2

An Open Lewisham as part of an Open London 2

The planning framework 2

How the plan has been prepared 5

How to use the plan 10

Strategic and non-strategic policies 12

2 Lewisham today and planning ahead 13

Introduction 13

Lewisham in context 13

3 Vision, strategic objectives and the spatial strategy 23

Vision for Lewisham 23

Strategic objectives 23

OL 1 Delivering an Open Lewisham (spatial strategy) 29

Part Two: Managing development 41

4 Managing development 42

5 High quality design 42

QD 1 Delivering high quality design in Lewisham 44

QD 2 Inclusive and safe design 49

QD 3 Public realm and connecting places 53

QD 4 Building heights 58

QD 5 View management 64

QD 6 Optimising site capacity 66

QD 7 Amenity and agent of change 69

QD 8 High quality housing design 76

QD 9 Building alterations, extensions and basement development 79

QD 10 Infill and backland sites, garden land and amenity areas 83

QD 11 Shopfronts 88

QD 12 Outdoor advertisements, digital displays and hoardings 91

6 Heritage 92

HE 1 Lewisham's historic environment 93

HE 2 Designated heritage assets 97

HE 3 Non-designated heritage assets 102

7 Housing 107

HO 1 Meeting Lewisham's housing needs 109

HO 2 Optimising the use of small housing sites 118

HO 3 Genuinely affordable housing 123

HO 4 Housing estate maintenance, renewal and regeneration 132

HO 5 Accommodation for older people 136

HO 6 Supported and specialised accommodation 141

HO 7 Purpose built student accommodation 143

HO 8 Housing with shared facilities (Houses in Multiple Occupation) ..... 147~~148~~
HO 9 Self-build and custom-build housing ..... 153~~153~~
HO 10 Gypsy and traveller accommodation ..... 155~~155~~

8 Economy and culture ..... **157~~157~~**
EC 1 A thriving and inclusive local economy ..... 159~~159~~
EC 2 Protecting employment land and delivering new workspace ..... 162~~162~~
EC 3 High quality employment areas and workspace ..... 168~~168~~
EC 4 Low-cost and affordable workspace ..... 172~~172~~
EC 5 Strategic Industrial Locations ..... 176~~176~~
EC 6 Locally Significant Industrial Sites ..... 178~~178~~
EC 7 Mixed-use Employment Locations ..... 182~~182~~
EC 8 Non-designated employment sites ..... 185~~185~~
EC 9 Railway arches ..... 188~~188~~
EC 10 Workplace training and job opportunities ..... 189~~189~~
EC 11 Town centres at the heart of our communities ..... 192~~192~~
EC12 Town centre network and hierarchy ..... 194~~194~~
EC 13 Optimising the use of town centre land and floorspace ..... 202~~202~~
EC 14 Major and District Centres ..... 204~~204~~
EC 15 Local Centres ..... 209~~209~~
EC 16 Shopping parades, corner shops and other service points ..... 212~~212~~
EC 17 Concentration of uses ..... 214~~214~~
EC 18 Culture, creative industries and the night-time economy ..... 217~~217~~
EC 19 Public houses ..... 222~~222~~
EC 20 Markets ..... 224~~224~~
EC 21 Visitor accommodation ..... 226~~226~~

9 Community infrastructure ..... **231~~231~~**
CI 1 Safeguarding and securing community infrastructure ..... 233~~233~~
CI 2 High quality community infrastructure ..... 236~~236~~
CI 3 Sports, recreation and play ..... 238~~238~~
CI 4 Nurseries and childcare facilities ..... 242~~242~~
CI 5 Burial space ..... 244~~244~~

10 Green infrastructure ..... **246~~246~~**
GR 1 Green infrastructure and Lewisham's Green Grid ..... 247~~247~~
GR 2 Open space ..... 249~~249~~
GR 3 Biodiversity and access to nature ..... 256~~256~~
GR 4 Lewisham Links ..... 262~~262~~
GR 5 Urban greening and trees ..... 263~~263~~
GR 6 Food growing ..... 268~~268~~
GR 7 Geodiversity ..... 269~~269~~

11 Sustainable design and infrastructure ..... **270~~270~~**
SD 1 Responding to the climate emergency ..... 272~~272~~
SD 2 Sustainable design and retrofitting ..... 273~~274~~
SD 3 Minimising greenhouse gas emissions ..... 276~~277~~
SD 4 Energy infrastructure ..... 279~~279~~
SD 5 Managing heat risk ..... 283~~283~~
SD 6 Improving air quality ..... 285~~285~~

SD 7 Minimising and managing flood risk ..... 288~~288~~
SD 8 Sustainable drainage ..... 292~~292~~
SD 9 Lewisham's waterways ..... 294~~294~~
SD 10 Water supply and wastewater ..... 302~~302~~
SD 11 Ground conditions ..... 304~~304~~
SD 12 Reducing and sustainably managing waste ..... 307~~307~~
SD 13 Design to support the circular economy ..... 310~~310~~

12 Transport and connectivity ..... **313~~313~~**
TR 1 Sustainable transport and movement ..... 315~~315~~
TR 2 Bakerloo line extension ..... 319~~319~~
TR 3 Healthy streets as part of healthy neighbourhoods ..... 322~~322~~
TR 4 Parking ..... 325~~325~~
TR 5 Deliveries, servicing and construction ..... 330~~330~~
TR 6 Taxis and private hire vehicles ..... 332~~332~~
TR 7 Digital connectivity ..... 333~~333~~

Part Three: Lewisham's neighbourhoods and places ..... **337~~337~~**

13 Lewisham's neighbourhoods and places ..... **338~~338~~**
Celebrating Lewisham's diversity and valuing its distinctiveness ..... 338~~338~~
Delivering the spatial strategy and meeting local needs ..... 339~~339~~

14 Lewisham's Central Area ..... **341~~341~~**
Context and character ..... 341~~341~~
Vision ..... 342~~342~~
Key spatial objectives ..... 342~~342~~
LCA 1 Central Area place principles ..... 343~~343~~
LCA 2 Lewisham Major Centre and surrounds ..... 346~~346~~
LCA 3 Catford Major Centre and surrounds ..... 348~~348~~
LCA 4 A21 Corridor ..... 350~~350~~
Site allocations ..... 354~~354~~

15 Lewisham's North Area ..... **354~~354~~**
Context and character ..... 354~~354~~
Vision ..... 355~~355~~
Key spatial objectives ..... 356~~356~~
LNA 1 North Area place principles ..... 357~~357~~
LNA 2 New Cross Road / A2 Corridor ..... 360~~360~~
LNA 3 Lewisham Creative Enterprise Zone ..... 361~~361~~
LNA 4 Thames Policy Area and Deptford Creekside ..... 363~~363~~
Site allocations ..... 366~~366~~

16 Lewisham's East Area ..... **367~~367~~**
Context and character ..... 367~~367~~
Vision ..... 368~~368~~
Key spatial objectives ..... 368~~368~~
LEA 1 East Area place principles ..... 369~~369~~
LEA 2 Lee Green District Centre and surrounds ..... 372~~372~~
LEA 3 Strategic Area for Regeneration, Grove Park ..... 373~~373~~
LEA 4 Linear network of green infrastructure ..... 373~~373~~

Site allocations ..... 376~~376~~

17 Lewisham's South Area ..... **376~~376~~**
Context and character ..... 376~~376~~
Vision ..... 377~~377~~
Key spatial objectives ..... 378~~378~~
LSA 1 South Area place principles ..... 379~~379~~
LSA 2 Strategic Area for Regeneration ..... 383~~383~~
LSA 3 Bell Green and Lower Sydenham ..... 384~~384~~
LSA 4 A21 Corridor / Bromley Road ..... 385~~385~~
Site Allocations ..... 389~~389~~

18 Lewisham's West Area ..... **390~~390~~**
Context and character ..... 390~~390~~
Vision ..... 390~~390~~
Key spatial objectives ..... 391~~391~~
LWA 1 West Area place principles ..... 392~~392~~
LWA 2 Connected network of town centres ..... 394~~394~~
LWA 3 Forest Hill District Centre and surrounds ..... 396~~396~~
Site allocations ..... 399~~399~~

Part Four: Delivery and monitoring ..... **400~~400~~**

19 Delivery and monitoring ..... **401~~401~~**
DM1 Working with stakeholders to deliver the Local Plan ..... 401~~401~~
DM2 Infrastructure funding and planning obligations ..... 402~~402~~
DM3 Masterplans and comprehensive development ..... 405~~405~~
DM4 Land assembly ..... 407~~407~~
DM5 Meanwhile uses ..... 408~~408~~
DM6 Health Impact Assessments ..... 409~~409~~
DM7 Monitoring and review ..... 410~~410~~

Part Five: Appendices and schedules ..... **415~~415~~**

20 Appendices ..... **416~~416~~**
Appendix 1: Abbreviations ..... 416~~416~~
Appendix 2: Glossary ..... 418~~418~~
Appendix 3: Non-strategic policies ..... 438~~438~~
Appendix 4: Policy replacement table and deleted policies ..... 438~~438~~
Appendix 5 Further information on proposals for public houses ..... 438~~438~~
Appendix 6 Housing trajectory and 5 Year Housing Land Supply ..... 441~~440~~

21 Schedules ..... **449~~441~~**
Schedule 1: Strategic and local views, vistas and landmarks ..... 449~~441~~
Schedule 2: Designated heritage assets ..... 450~~442~~
Schedule 3: Non-designated heritage assets ..... 451~~442~~
Schedule 4: Designated employment land ..... 451~~443~~
Schedule 5: Town centres and Primary Shopping Areas ..... 453~~445~~
Schedule 6: CEZ, Cultural Quarters and Night-time Economy Hubs ..... 456~~448~~
Schedule 7: Designated Open Spaces ..... 456~~448~~
Schedule 8: Designated Sites of Importance for Nature Conservation ..... 471~~463~~
Schedule 9: Local Nature Reserves and Ecological Corridors ..... 474~~466~~

Schedule 10: Sites of geodiversity interest.....*474~~466~~*
Schedule 11: Regeneration nodes, growth nodes and growth corridors.....*474~~466~~*
Schedule 12: Tall Building Suitability Zones.....*475*

Part One:

Planning for an Open Lewisham

1 About Lewisham's Local Plan

An Open Lewisham as part of an Open London

1.1. Lewisham's Local Plan sets out a shared vision for the future of the Borough along with the planning and investment framework to deliver this vision through to 2040. ~~The main objective of the plan is to achieve 'An Open Lewisham as part of an Open London'. This reflects our commitment to ensure that Lewisham is a welcoming place of safety for all, and where the diversity of the Borough is celebrated. The prosperity of our local neighbourhoods, and the communities of people within them, is essential to ensuring equality of opportunity and for everyone to enjoy a good quality of life.~~

1.2. ~~London has experienced a period of rapid growth and this is expected to continue. Lewisham will grow and evolve as London does.~~ This Local Plan has been prepared to ensure there is a clear framework in place to ~~positively~~ manage growth and deliver sustainable development in a way that respects the distinctive character and diversity of the Borough and its people. ~~The plan~~ It will help to ensure that planning and investment decisions help to meet ~~the~~ local needs, ~~and~~ respond to the aspirations of our communities ~~and contribute to sustaining and creating~~ and contribute to inclusive, safe, healthy and liveable neighbourhoods.

1.3. The ~~Mayor of London recently introduced the~~ concept of 'Good Growth' ~~underpinning~~ underpins the ~~new draft~~ London Plan (2021). Good Growth is growth that is socially and economically inclusive and environmentally sustainable.[1] Sitting alongside this is the Mayor of London's ambition for the Capital to be 'A City for all Londoners'. The main objective of this Local Plan for 'An Open Lewisham as part of an Open London' responds to these aspirations ~~at a local level, whist~~ recognising ~~the important role~~ that Lewisham ~~plays as~~is an integral part of London.

1.4. The successful delivery of the Local Plan will require strong and effective partnership working ~~between public and private sector stakeholders, as well as local communities~~. The Council will continue to take a leadership role in planning positively for the Borough and ensuring equality of opportunity. Through our unique ways of working, known as the 'Lewisham Way', we will work with and alongside public and private sector stakeholders, local communities and community groups ~~and~~ as well as local residents to ~~deliver~~ realise the Local Plan objectives, ~~guided by the aim of delivering prosperous communities and achieving better outcomes for all~~so that everyone in Lewisham can enjoy a good quality of life.

The planning framework

1.5. Lewisham's Local Plan is prepared within the context of a wider planning framework. This sets the main parameters for the plan making process, as well as the contents of local plans and how they should operate. The Planning and Compulsory Purchase Act 2004 is primary legislation that provides the main basis for the plan-led system in England. It is supported by secondary legislation, including the Town and Country Planning (Local Planning) (England) Regulations

Commented [NE3]: Removed to make more concise

Commented [NE4]: Reference to adopted/published London Plan amended throughout the Local Plan; it has come into force following the Regulation 18 consultation

Commented [NE5]: Amended for clarity

[1] The London Plan~~, Intend to Publish Version (December, 2019),~~ (2021), paragraph 0.0.18

2012 (as amended), which provide further details on the process for the Council to prepare and adopt the local plan and other supporting documents.

National planning policy and the London Plan

1.6. The Local Plan is required to be consistent with national policy, including the National Planning Policy Framework (NPPF) (~~2019~~2021) and planning Circulars. The NPPF sets out the Government's planning policies for England and how they should be applied. It includes parameters for the preparation of local plans and is also a material consideration in planning decisions. The NPPF is supported by National Planning Practice Guidance (NPPG) ~~covering a variety of topic areas~~.

1.7. The Local Plan must also be in general conformity with the regional planning policies contained in the London Plan, which is produced by the Mayor of London. The London Plan is the Spatial Development Strategy for Greater London. It helps to ensure a coordinated approach to planning across all boroughs. The London Plan forms part of Lewisham's development plan, meaning it must be taken into account in planning decisions. The London Mayor also prepares Supplementary Planning Guidance (SPG) documents that support implementation of the London Plan.

~~1.8. A new London Plan has been prepared by the London Mayor to replace the London Plan (March 2016), although it does not yet carry full material weight.[2] Where reference is made to the 'draft London Plan' in this document, this means the Intend to Publish Version (December 2019).~~

Commented [NE6]: Factual update – London Plan now adopted

Lewisham's development plan

~~1.9.~~1.8. Lewisham's statutory development plan consists of the Local Plan ~~(previously known as the Local Development Framework)~~ along with the London Plan and adopted neighbourhood plans. Planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise.[3] The diagram below illustrates how the Local Plan and its supporting documents sit within the wider planning framework.

Figure 1.1: The planning policy hierarchy

~~Lewisham's new Local Plan 2020-2040~~

~~1.10.~~1.9. Once adopted Lewisham's new Local Plan 2020-2040 will replace ~~the Council's current suite of development plan documents, bringing the updated policies together into a single plan.[4]~~ the Core Strategy (2011), Site Allocations Local Plan (2013), Development Management Local Plan (2014) and Lewisham Town Centre Local Plan (2014).

~~1.11. We are producing a new Local Plan to:~~

~~[2] The new London Plan has been subject to an Examination in Public led by independent inspectors appointed by the Secretary of State. At this time, outcomes of the examination process are pending, and the new London Plan does not therefore carry full material weight.~~

[3] Planning and Compulsory Purchase Act 2004, Section 28 (6).

~~[4] The Local Plan will update and consolidate the Core Strategy (2011), Site Allocations Local Plan (2013), Development Management Local Plan (2014), and Lewisham Town Centre Local Plan (2014), and replace these documents, once adopted.~~

- Respond to significant **changes to the wider planning context** – since the Lewisham Core Strategy was adopted in 2011, new national policy has been introduced, i.e. the NPPF. This includes new requirements both for plan making and decision taking. The London Plan has also been substantially updated and a draft new (replacement) plan has been published with significant policy changes and a new spatial development strategy. In addition, the Council has a new statutory duty to review its Local Plan every five years. We need to ensure there is an up-to-date plan that aligns with these new higher-level policies and requirements.

- Respond to the **climate emergency** – in February 2019 the Council declared a climate emergency.[5] We recognise that a changing climate will have severe and enduring implications, and that tackling climate change is an issue of social justice as the greatest impacts will be on the most vulnerable. The new Local Plan is needed to respond to the climate emergency, with a clear framework for Lewisham to contribute to meeting the UK's new net zero carbon target.[6]

- Realise the **objective of an Open Lewisham** – a new plan is needed to address the emerging challenges and opportunities that our residents, businesses and visitors now face. The Local Plan will help to manage growth and coordinate investment locally, reflecting the aspirations and priorities of local communities and the Council's new Corporate Strategy 2018-2022. The plan is also presented in a new format to help deliver this vision. 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 and land to accommodate new homes along with workspace and jobs, town centre uses and community facilities.

- 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 draft London Plan now confirms a commitment to upgrade and extend the Bakerloo line (London Underground) to Lewisham. The new Local Plan is needed to help secure the delivery of the

[5] London Borough of Lewisham. Meeting of Council on 27 February 2019. Motion 2 declared to be unanimously carried.
[6] In June 2019, the UK passed legislation to revise the Climate Change Act target to an emissions reduction of "at least 100%" by 2050 (net zero).

~~tube line extension and set a framework to maximise the local benefits it can bring.~~

Commented [NE7]: Not required for Regulation 19 plan

How the plan ~~is being~~has been prepared

Key stages

~~1.12.~~1.10. There are a number of stages involved in the preparation of a local plan~~. In addition, there are procedural requirements~~ along with procedures that the Council is required to comply with throughout. These stages and requirements are prescribed by national policy and legislation. This includes the undertaking of multiple rounds of public consultation before a draft local plan can be submitted to the Secretary of State for independent public examination.

~~1.13.~~1.11. Figure 1.2 sets out the key stages of the plan making process, highlighting the current stage of production.[7]

Consultation on Main Issues (Regulation 18)	October – November 2015
Pre-production (with community and stakeholder engagement). ~~(This includes consultation on 'Call for Sites' exercises, landowner surveys and public engagement on the preparation of evidence base documents, including area-based strategies.)~~	~~Ongoing~~ Up to October 2020
Consultation on the Main Issues and Preferred Approaches (Regulation 18)	~~**Winter – Spring 2021**~~ January – April 2021
Publication of the ~~draft~~ Local Plan / consultation on the~~,~~ 'proposed submission ~~version~~document'' (Regulation 19)	~~Autumn 2021 Spring~~Autumn 2022
Submission to the Secretary of State and Examination in Public (Regulations 22-25)	Winter ~~Spring~~ 2022/2023
Adoption by Council (Regulation 26)	Summer - Autumn 2023~~2~~

Commented [NE8]: Factual updates on plan programme

Figure 1.2: Key stages of the plan making process

Evidence base

~~1.14.~~1.12. ~~We have compiled a number of~~The evidence base is made up of studies and supporting documents ~~to help~~that inform the preparation of the new Local Plan. These have been prepared both by the Council and other organisations, including government bodies. ~~Collectively, these documents are known as the 'evidence base'.~~ The evidence base helps to ensure that the approaches and policies in the Local Plan are appropriate and justified, taking into account the latest available information.

[7] These reflect the key stages of the plan-making process as set out in The Town and Country (Local Planning) (England) Regulations 2012, as amended.

~~1.15.~~1.13. Our evidence base comprises technical studies, research reports, site and area masterplans~~, an Integrated Impact Assessment~~ and other information covering a variety of policy topic areas ~~and local issues, including: design, housing, economy, environment, transport and infrastructure~~. We have consulted local communities and other stakeholders on the preparation of some evidence base documents. This includes the Lewisham Characterisation Study (2019), the New Cross Area Framework (2019), ~~and~~ Catford Town Centre ~~Masterplan~~Framework (2021) and A21 Development Framework (2022). The evidence base documents ~~have been made~~are ~~publically~~ available on the Council's website. ~~and form part of the Local Plan library.~~

Commented [NE9]: Factual updates

Integrated Impact Assessment

~~1.16.~~1.14. An Integrated Impact Assessment (IIA) helps to inform the preparation of the Local Plan. It is a detailed analysis of the potential environmental, social and economic effects of the plan. The IIA brings different types of assessment together into a single process, including:

- Strategic Environmental Assessment (SEA)
- Sustainability Appraisal (SA)
- Equalities Impact Assessment (EqIA)
- Health Impact Assessment (HIA)

~~1.17.~~1.15. The IIA is undertaken as an iterative process during the plan's preparation. It includes assessments of preferred policy approaches and reasonable alternatives. Reports are published and consulted on at key stages in the plan process, often alongside draft Local Plan documents. The IIA helps to identify potential issues at an early stage so that measures to avoid or mitigate harm, and improve expected outcomes, can be incorporated into the plan.

~~1.18.~~1.16. A separate Habitats Regulations Assessment (HRA) is also carried out to assess whether protected habitats and species may be adversely impacted by the plan's implementation.[8]

Tests of soundness

~~1.19.~~1.17. The Local Plan sets out an ambitious programme to help facilitate investment in our neighbourhoods and sustainably manage growth over the long-term. To realise the plan's vision and to secure the new homes, jobs and infrastructure required for Lewisham, the plan must be demonstrated to be deliverable. The NPPF sets out 'tests of soundness' that help to ensure deliverability. The soundness of the plan is assessed at the examination stage.

Tests of soundness for local plans (NPPF, paragraph 35).	
Positively prepared	Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

[8] Designated under European Union council Directive on the conservation of wild birds (79/409/ EEC) 1992, European Union council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) 1992 and Ramsar Convention on wetlands of international importance.

Justified	An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
Effective	Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
Consistent with national policy	Enabling the delivery of sustainable development in accordance with the policies in this Framework.

Table 1.1: Tests of soundness for local plans (NPPF, paragraph 35)

Duty to Cooperate

~~1.20.~~1.18. The Localism Act (2011), subsequent regulations and the NPPF place a statutory duty on local planning authorities to cooperate with each other, and other bodies, when preparing, or supporting the preparation of policies which address strategic matters. This includes those policies contained in local plans. The Council has and will continue to work positively with its neighbouring authorities and other relevant public bodies to identify and address issues of strategic importance during the preparation and implementation of Lewisham's new Local Plan. ~~We are in the process of liaising with stakeholders as part of the Duty to Cooperate and to inform the preparation of Statements of Common Ground, which will be published in due course.~~

Commented [NE10]: Not required for Regulation 19 plan

~~Getting involved in the new Local Plan~~

~~1.21. The preparation of the Local Plan, and its successful implementation, will require Lewisham Council to take a positive and proactive approach to working alongside a wide range of stakeholders. We are committed to engaging with local residents, community groups, businesses, infrastructure providers, landowners, neighbouring local authorities and other stakeholders. Meaningful dialogue, including through formal public consultation, helps to ensure that the Local Plan reflects the aspirations of the wider community and that it is deliverable.~~

~~1.22. This document has been prepared for a statutory public consultation (Regulation 18 stage). It sets out the main issues for the new Local Plan and possible options to address these, including our preferred policy approaches at this time.. The draft Local Plan has been prepared taking into account feedback from the public through early consultation and engagement exercises, as outlined below.~~

~~**Previous engagement and the journey so far**~~

~~Starting the Local Plan review~~

~~1.23. We have undertaken a number of consultation and engagement exercises around the main challenges and opportunities for the Borough to inform the preparation of a new local plan. . We launched the Local Plan review in 2015 and published several documents for formal public consultation.[9]~~

~~[9] The consultation documents, published in October 2015, comprised the Lewisham Local Plan – Consultation on Main Issues and companion questionnaire, Sustainability Appraisal Scoping Report and Infrastructure Delivery Plan (IDP) Framework Document.~~

1.24. At that time we invited local residents, community groups, businesses, key stakeholders and others with an interest in the Borough to help us to identify the key planning issues for Lewisham and the potential options for addressing them.

We have also carried out several 'call for sites' exercises inviting the wider public, including landowners, to identify land that might be available for different types of development.[10] We have surveyed landowners of key strategic sites and asked for information on the likely timescales for new development to come forward at these locations as well as any factors that could affect delivery.

What has changed since?

1.25. There have been significant changes in the planning context since we embarked on the Local Plan review in late 2015. At a national policy level the NPPF was revised in 2018 and updated in 2019. At the regional policy level, the Mayor of London published alterations to the London Plan in 2015 and again in 2016); a completely new (replacement) London Plan was then drafted in 2017 and has recently undergone independent examination. Both the NPPF and the draft London Plan provide for fundamental changes to the planning framework for Lewisham.

1.26. Alongside these changes to higher-level policies there have been important initiatives at the local level. The Council adopted the 'Corporate Strategy 2018 – 2022' that sets out our new strategic priorities. In 2019, we declared a climate emergency that requires an urgent and strategic response. Many other key initiatives have also been kick-started. They cut across the Council's different service areas but invariably link to forward planning.

1.27. Since 2015 Lewisham itself has also changed. The existing local plan has helped to facilitate substantial investment in our neighbourhoods. Crucially, the Council has consistently delivered on its housing targets, bringing more affordable housing to those in need. Furthermore, all of the strategic site allocations identified in the Core Strategy have now been committed – this means that the sites have gained planning consent, with construction having started or completed on some. Within some parts of the Borough significant plan-led regeneration has also been realised, and is continuing, bringing benefits to local neighbourhoods and communities

1.28. Finally, Coronavirus (COVID-19) has had a profound impact on countries around the world. The initial peak of COVID-19 was experienced by the UK in spring 2020. It has directly affected people and communities across Lewisham and remains an ongoing concern. The Council continues to play a critical role by working with its partners to deliver essential services. Our priority during this period is to support everyone in the Borough through these unprecedented times, safeguarding the health of local communities and protecting the most vulnerable. Despite the current uncertain circumstances, it will be vital to plan proactively towards a recovery. This means taking stock of the different ways in which Lewisham's neighbourhoods, communities and local economy have been (and may continue to be) affected and responding with timely and appropriate measures

Early engagement on the main planning issues

[10] The Council carried out 'call for sites' exercises in May-June 2015 and September-November 2018. We also supported the London Mayor with the 'call for sites' in March-June 2016, as part of the London Strategic Housing Land Availability Assessment (SHLAA) informing the new London Plan.

1.29. The public consultation in 2015 identified a number of planning issues. Since then, we have continued to engage with local communities and other stakeholders to broaden our understanding of the key challenges and opportunities in Lewisham, including through the preparation of the evidence base documents. For example, we have undertaken consultation on the Lewisham Characterisation Study (2019) and area-based strategies such as the New Cross Area Framework and Catford Town Centre Masterplan.

1.30. As the starting point for preparing a new plan, we have looked at the adopted Core Strategy, its key development principles and what this strategy has delivered. We have identified a number of new challenges that need to be addressed at the strategic level. These relate mainly to the future levels of growth to be accommodated in the Borough, the competing pressures on different land uses, and above all the need to deliver new development in a socially, economically and environmentally sustainable way.

1.31. Our early engagement exercises have also explored key issues and opportunities across specific topic areas. This includes: the continuing need to meet different types of local housing needs, such as affordable housing and specialist accommodation for older people; the opportunities provided by the major centres of Lewisham and Catford to accommodate new homes, workspace, services and facilities; further significant opportunities for renewing and revitalising district town centres and local hubs; a need for areas outside of these key locations to accommodate investment and growth through infill and small scale development; and a renewed focus on Lewisham's places to reflect local identity and foster a real sense of place.

Re-visiting the main planning issues

1.32. Whilst many of the issues identified in 2015 remain relevant today, the wider context for the new plan has changed. This includes the fundamental changes to national and regional planning policy, as well as the evolving role and character Lewisham in a rapidly growing London. Furthermore, there is greater urgency required to address specific issues, such as the climate emergency and COVID-19, and acute local needs for genuinely affordable housing. We are therefore revisiting the main issues and approaches outlined in 2015 through this consultation document. This will ensure that the new Local Plan responds to our corporate priorities and remains fit for Lewisham over the long-term.

1.33. Responses received on the 2015 main issues consultation and other engagement exercises have been considered in the preparation of this document. We have provided a summary of the responses received in 2015 as part of the Consultation Statement. In addition, all the sites identified through our numerous 'call for sites' exercises have been taken into account.[11] We have used feedback from previous engagement to help identify the main issues for the Local Plan and to inform the preparation of the policy options and preferred approaches outlined here.

Have your say

[11] Further information is set out in the Lewisham Local Plan: Site Allocations Background Paper (2020).

1.34. This consultation provides the public with an opportunity to review and respond to the 'Lewisham Local Plan: Main Issues and Preferred Approaches' (Regulation 18 stage) document.

1.35. This document both builds on and is informed by previous consultation and engagement exercises, along with the latest evidence base. It reflects our understanding of the main issues for the new Local Plan along with possible approaches to address these through planning policy. The document also sets out the Council's preferred policy approaches at this time, having considered the reasonable alternatives.[12] This includes approaches to the spatial (growth) strategy for the Borough; detailed 'development management' policies on a range of topics; and area-based policies, with principles for the development and use of land on specific sites (site allocations).

1.36. **This document is largely presented as a draft plan, with a clear structure and detailed policy proposals covering a range of policy areas. However it is imperative to stress that the new Local Plan is still very much in the early production stages. Notwithstanding the 'preferred policy approaches' included herein, the Council retains an open mind as to the scope and contents of the new Local Plan. We will take into account all representations made through this and other formal stages of consultation, and use them to inform the preparation of the plan.**

1.37. We are now inviting feedback on the entirety of the 'Lewisham Local Plan: Main Issues and Preferred Approaches' document. This includes the matters we have identified to be addressed by the new Local Plan (i.e. the scope), its strategic objectives, the main planning issues and opportunities in Lewisham, and the possible policy approaches to address these. We also want to learn if there are any issues, opportunities and/or policy alternatives that have not yet been identified, but which should be considered as work on the plan progresses.

1.38. We will take account of all representations made during this Regulation 18 stage public consultation. Responses will be used to inform the 'publication' version of the new Local Plan, which will be made available for a further round of statutory public consultation (i.e. Regulation 19 stage). Throughout the plan's production, we will publish consultation statements summarising feedback received during statutory public consultation and how this has been taken into account.

Commented [NE11]: Not required for Regulation 19 plan

How to use the plan

1.39.1.19. The Local Plan sets out a vision, strategic objectives and planning policies that together provide the overarching framework for the delivery of sustainable development in the Borough. It covers the twenty-year period from 2020 to 2040.[13] The plan will help to support implementation of the draft London Plan and its Good Growth policiesobjectiveslocally, recognising that Lewisham is an integral part of London.

[12] An Integrated Impact Assessment (IIA) has been prepared alongside this Local Plan document. The IIA provides further details on the 'reasonable alternatives' identified and considered during the plan-making process, along with the reasons the Council has selected the 'preferred approaches' over other options, at this point in time.

[13] The plan period differs from that initially proposed in the "Lewisham Local Plan – Consultation on Main Issues" (2015) document in order to comply with the new requirements of the NPPF (2019).

~~1.40. The Local Plan will be used by the Council, its partners, key stakeholders, community groups and others as a tool to help guide critical decisions on investment, including for strategic infrastructure. It establishes a spatial strategy that aims to direct growth and different kinds of development across the Borough in in a way that responds to the distinctive qualities of Lewisham's people and places. The Local Plan also provides a coordinated strategy for each of the character sub-areas of the Borough, addressing the neighbourhoods that residents, businesses, and visitors use every day.~~

Commented [NE12]: Removed to make more concise

~~1.41.~~1.20. For legibility the Local Plan is set out in five main parts and sub-sections that cover a ~~number~~ range of thematic policy areas however it must be read as a whole~~, particularly for the purpose of planning and investment decisions~~. The order of topics and policies is not a reflection of their weight or importance.[14]

~~1.42.~~1.21. The Local Plan is organised into five main parts:

- **Part One: ~~Setting the scene and the spatial~~** ~~strategy~~ Planning for an Open Lewisham – Provides background information about the Local Plan. It then sets out the Vision for Lewisham and the plan's strategic objectives, along with the~~. It also establishes the proposed~~ 'spatial strategy' for the Borough, the land-use priorities and overall pattern of development that the plan ~~will~~ seeks to deliver.
- **Part Two: Managing development** – Sets out the ~~proposed~~ 'development management' policies – these are the requirements ~~standards and guidelines~~ that planning applications will need to comply with to support the delivery of Good Growth in Lewisham. These are organised by thematic policy topic areas~~. – for each we highlight how we have arrived at the proposals, as set out below:~~
    - ~~**What you've told us –** A summary of comments from early consultation and engagement exercises. This includes feedback from studies and area-based strategies that have informed, and will help to support, the Local Plan (e.g. New Cross Area Framework and Catford Town Centre Masterplan).~~
    - ~~**What we've learned** – Key findings from research and studies of the Borough.~~
    - ~~**Main issues** – Our understanding of the main issues for the new Local Plan, drawing from public feedback and the evidence base.~~
    - ~~**We're proposing to** – A short summary of the preferred policy approaches to address the main issues. The full details of the preferred approaches are included afterwards (these are distinguished by draft policies with titles and reference numbers).~~

[14] This also applies to the Key Spatial Objectives and policies for each of the character areas set out in Part 3 of the Local Plan.

- ~~**We've also considered** – Identifies the other policy approaches that have been considered (i.e. reasonable alternatives) but which are not proposed to be taken forward in the draft plan.[15]~~

- **Part Three: Lewisham's neighbourhoods & places** – Establishes five character areas ~~within the Borough~~ based around Lewisham's distinctive neighbourhoods and places. A vision, key spatial objectives and ~~strategic priorities~~planning policies ~~(referred to as 'place principles')~~ are set out for each of these areas, ~~along with~~including site allocation policies for ~~strategic~~ specific development sites.
- **Part Four: Delivery and monitoring** – Sets out the implementation framework for the Local Plan~~, as well as~~ along with the arrangements for monitoring delivery outcomes over the plan period.
- **Part Five: Schedules and appendices** – Includes additional technical information and guidance to support implementation of the plan.

Strategic and non-strategic policies

~~1.43.~~1.22. The Council is legally required to identify the strategic priorities for the development and use of land in the Borough, and to set out policies to address these in the local plan.[16] The NPPF also makes clear that local plans should identify and clearly distinguish strategic policies from other non-strategic policies.[17] A schedule of the Local Plan non-strategic policies is included in in Part 5 of the Local Plan. Those policies not included in the schedule~~d~~ are strategic policies.

Community engagement and n~~N~~eighbourhood planning

~~1.44.~~1.23. We will continue to work with local communities and community groups, including residents' groups and amenity societies, to improve transparency and openness in decision-making, and to foster greater public understanding of and involvement in the planning process. Further information on the Council's procedures for public consultation on planning decisions is set out in the Statement of Community Involvement (SCI), which is available on our planning webpage.

~~1.45.~~1.24. The Council has a statutory duty to support designated neighbourhood forums in the preparation of neighbourhood plans. We will work positively with forums to ensure their plans appropriately support the Council's strategic planning priorities, so that they have the best chance of succeeding at the examination stage and can be formally adopted. This Local Plan is presented in a new format that responds to the strong interest in neighbourhood planning in Lewisham. For example, Part Three sets key objectives and priorities for the Borough's character areas. It provides a useful reference point from which neighbourhood forums, and other community groups, can work to support the Local Plan's implementation.

Commented [NE13]: Not required for Regulation 19 plan

Commented [NE14]: Respond to consultation – request for amenity groups to be referred

Commented [NE15]: Respond to consultation – request for further information about how community groups can get involved in the planning process

~~[15] The Lewisham Local Plan Integrated Impact Assessment (IIA) - Interim Report (2020) includes a detailed discussion of the reasonable alternatives considered during the preparation of this Local Plan document.~~

[16] Planning and Compulsory Purchase Act 2004, Section 39(2).

[17] NPPF (2019), paragraph 21.

~~1.46.~~1.25. Neighbourhood plans are required to be consistent with the strategic policies in Lewisham's development plan ~~(including London Plan and Local Plan policies),~~ and should only include non-strategic policies, as ~~required by~~set out in the NPPF.

2 Lewisham today and planning ahead

Introduction

2.1. This section provides an ~~brief~~ overview of Lewisham in the context of London ~~and the wider region~~. It draws on the latest available information to provide a snapshot of the Borough and its people ~~across a range of topic areas, highlighting key findings and recent~~ looking at the current situation and considering future trends. ~~It also identifies some of the main opportunities and challenges facing Lewisham's residents, businesses and visitors, including considerations for the built and natural environment.~~ This information highlights some of the main challenges and opportunities for the Local Plan to address.

Figure 2.1: Lewisham borough map

Lewisham in context

Commented [NE16]: This section has been rewritten for organisational purposes and to update with latest information

~~2.2. Lewisham is an inner-London borough strategically located in the Thames Gateway, with connections to Canary Wharf and the Central Activities Zone. It has major centres at Lewisham and Catford, and two London Plan Opportunity Areas with strategic potential (New Cross / Lewisham / Catford corridor and 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.~~

~~2.3. 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.~~

~~2.4. 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.~~

~~2.5. Physical activity is a key determinant of public health and wellbeing, with obesity linked to many serious risks in children and adults. Whilst over half of Lewisham adults are physically active, adult and childhood obesity is an issue. Children living in the Borough's most deprived areas twice as likely to be obese or overweight as other children.~~

~~2.6. 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 over 600 statutory listed buildings, 29 Conservation Areas, as well as Lewisham's varied and vibrant cultural scene. 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.

2.7. Despite Lewisham's strategic inner London location, its local economy is generally small and inward looking. Local jobs are concentrated in the public sector and consumer services, with high levels of small business activity including self-employment, micro businesses, and sole proprietors. Whilst a relatively limited proportion of residents are employed in the Borough, a relatively high proportion are economically active. Many residents lack workplace skills and qualifications, and GCSE results are below the London average. 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.

Figure 2.2: Lewisham in context

Figure 2.3: Levels of deprivation in Lewisham

2.8. 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 process of plan-led industrial land consolidation has occurred in recent years to help facilitate regeneration in the north of the Borough. However the rate of employment land release (on both designated and non-designated sites) has been significant in recent years. 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. There is projected to be less demand for retail floorspace over the future, with greater demand to accommodate leisure and other complementary town centre uses.

2.9. 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 public access to open space. This is often a result of natural and constructed features (river valleys, railway lines, major arterial roads), which can act as a barrier to movement by walking and cycling. Overall more than 95% of the publically accessible spaces in Lewisham are considered to be of good or fair quality. Whilst carbon dioxide emissions and total energy consumption have steadily fallen in Lewisham, emissions remain an issue and the Council has 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 energy to homes and businesses in the north of the Borough.

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 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. Large parts of the Borough are covered by Air Quality Management Areas, including along main and arterial roads.

2.11. The draft 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 the Borough.

Planning ahead for an Open Lewisham

2.12. This section provides an overview of some of the key strategic issues and opportunities that the Local Plan will look to address. This is informed by the analysis of the existing characteristics of Lewisham today, and also considering likely future trends. The main issues have also been identified through ongoing public engagement, including with local communities, residents, businesses and visitors. The section considers the key drivers for change and investment in Lewisham up to 2040, and reflects on some of the main outcomes sought through a new Local Plan.

Accommodating growth

2.13. 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.[18] 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 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.

2.14. Since the Core Strategy was adopted in 2011 Lewisham has delivered a consistent supply of new homes, regularly exceeding its housing targets. The Council recognises the issues around access to high quality and genuinely affordable housing. The scale of the need is reflected in both the draft new London Plan and the NPPF housing targets, and the expectation is that the Borough will continue to play a key role in accommodating housing growth.

2.15. The draft 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

[18] Greater London Authority, Housing-led population projections (2017)

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 in the Borough is up to 2,964 net units per year.

2.16. Evidence shows that there is a need to secure additional retail and employment floorspace in Lewisham. There is an estimated demand for approximately 5,300 net additional square metres of retail floorspace up to 2030 and 21,800 net additional square metres of employment floorspace up to 2038. By planning to meet this need, we can help to address the economic issues facing our high streets and support the evolving role of town centres as leisure and entertainment destinations. It should also support an improved local economy and an increase in local jobs, and assist in growing the creative and digital industry clusters.

2.17. 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 allowing for the conversion of workspace to non-employment uses. Evidence suggests that there no further scope for the loss of industrial land in Lewisham, and that the protection and intensification of existing sites should be pursued in order to meet future demand for workspace, particularly for smaller and medium sized businesses.

The draft London Plan includes a commitment to the Bakerloo line extension (BLE). The BLE will connect Lewisham to the London Underground (tube) network for the first time. It has huge potential to both facilitate and support growth by helping to unlock the development potential of areas and sites, as well as improving transport accessibility in Lewisham and the wider southeast. The BLE Local Economic Assessment (2020) is an evidence base document which supports the Local Plan, and shows the extent to which the BLE will act as a catalyst for growth in housing, business space and jobs.

Tackling deprivation and ensuring equality of opportunity

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

2.19. There has been significant investment in recent years in many parts of Lewisham. In order to tackle deprivation and ensure equality of opportunity for all, it will be necessary to ensure all Lewisham residents benefit from future investment in new homes, jobs, town centre uses, and supporting infrastructure.

2.20. Lewisham is a very attractive place to live, however local households are increasingly spending a larger proportion of their incomes on housing costs. Furthermore, there are groups with specific requirements, including families and older people, whose choices are limited in the current market. To address inequalities and improve the quality of life of residents, it is vital that new housing development provides for different types and sizes of accommodation, whilst maximising the delivery of genuinely affordable housing.

2.21. For people to participate meaningfully in their communities, and to fully benefit from London's economic advantages, it is important that they are able to take up employment. Access to training and job opportunities is vital to addressing inequality and achieving social equity. Despite being strategically situated, Lewisham has a smaller and inward looking economy. It is necessary to grow and diversify the local economy, creating more and a wider range of businesses and job opportunities for residents to access.

Achieving healthier, more liveable and resilient communities

2.22. To improve the wellbeing of the Borough's population, it will be necessary to address the wider determinants of health and deprivation in a more integrated way. This is especially to ensure that Lewisham's children and young people are given the best start in life and allowed to fulfil their potential. Good access to high quality education and health care is critical. It is also important that people are able to pursue active and healthy lifestyles with relative ease.

2.23. The built environment is critical to achieving these ambitions. The layout and design of places and spaces can enable and encourage active travel choices, such as walking and cycling. Additionally, it can assist in reducing people's exposure to harmful pollutants or other disturbances, and increase the ability of people to access high quality open space and natural features. Such spaces can impact positively on physical and mental health by allowing opportunities for leisure, recreation, and dwelling. The Local Plan will need to ensure that all new development addresses public health and wellbeing in a more integrated and systematic manner.

2.24. Levels of public transport accessibility differ across neighbourhoods, and some areas suffer from very poor levels of service. This contributes to a reliance on private car use and causes traffic congestion, along with environmental issues such as pollution and carbon emissions. The Local Plan will need to ensure improvements to public transport services are provided, that accessibility is increased, and that there is a reduced need for people to travel long distances. This will require a coordinated approach to investment in transport infrastructure and the public realm, alongside the provision of a better connected network of high quality town centres and local destinations to reduce the need to travel by car, and the creation of compact neighbourhoods.

2.25. Lewisham has many diverse places, neighbourhoods, and communities shaped by the Borough's varied history and cultural development. To accommodate growth and investment in a coordinated manner the local plan will need to carefully consider the existing character of local places and neighbourhoods, and the mixed and diverse communities that make Lewisham so unique. The Local Plan will set a spatial strategy that will coordinate growth and investment across the different places and neighbourhoods of Lewisham, informed by an analysis of character in the different parts of the Borough.

2.26. Global climate change poses a significant threat to the natural environment and the human population, and is the most important challenge we currently face. Lewisham is committed to tackling climate change and declared a 'climate

~~emergency' in February 2019. The Local Plan will assist in mitigating climate change by continuing to realise long-term reductions in energy use and carbon emissions. Lewisham will play its part in realising the draft London Plan objective for London to become a zero carbon city by 2050. The impacts of climate change will be felt differently across areas, and it poses a very real risks to human safety. Given the characteristics and patterns of development in Lewisham it will be necessary for the Borough's localities to become more resilient and better placed to adapt to its impacts. The Local Plan will consider the local implications of the climate emergency in Lewisham~~

Location

~~2.27.~~2.2. Lewisham is an inner-London borough located to the south of the River Thames. As shown in Figure 2.2 it has good transport links to the rest London, including the Central Activities Zone, along with connections to the wider South East of England. Lewisham is bordered to the north by the Thames and the London boroughs of Southwark to the west, Greenwich to the east and Bromley to the south.

Figure 2.2 Lewisham in context

Population

2.3. Like London, Lewisham has experienced a sustained period of population growth. The Borough's population grew from 248,900 in 2001[19] to an estimated 306,950 people in 2020[20], an increase of roughly 23 per cent over the last 20 years. Whilst Brexit and the Covid-19 pandemic have had short-term impacts on migration patterns research suggests that London will continue growing over the long-term.[21] Lewisham's population is forecast to rise by some 42,400 people or 14 per cent by 2040.[22]

2.4. Lewisham has a relatively young population. One-quarter of residents were less than 20 years old at the time of the 2011 Census. However older people are the fastest growing demographic group in London. The number and proportion of people aged 65 or more is expected to rise sharply over the next decades, including in Lewisham.[23]

2.5. Lewisham is one of the most ethnically diverse places in the country. Some 46 per cent of residents identify themselves as having Black, Asian and Minority Ethnic (BAME) heritage.[24] This rises to 76 percent for the school population[25] with more than 170 languages spoken by students in the Borough[26]. The electoral roll shows that Lewisham is home to residents of 75 nationalities.

[19] Office for National Statistics. Census 2001.
[20] Greater London Authority. 2019-based BPO Population Projections.
[21] Greater London Authority. 2020-based Population Projection Results: A summary of the GLA 2020-based trend and housing-led demographic projections (2021).
[22] Greater London Authority. 2019-based BPO Population Projections.
[23] Centre for London. London: A place for older people to call home. Joe Wills and Erica Belcher. (2020) and Lewisham SHMA (2022).
[24] Office for National Statistics. Census 2011.
[25] Lewisham Corporate Strategy 2018-2022.
[26] School Language Census (2018).

Deprivation and inequality

2.6. Lewisham is a place of stark contrasts in so much as it contains areas of wealth as well as deprivation, as shown in Figure 2.3. Whilst overall levels of deprivation in Lewisham have declined over the past decade it continues to rank amongst the 20 per cent most deprived local authority areas in the country and is the 7th most deprived in London.[27] Child poverty is a significant issue with some of the highest levels in the country.[28]

2.7. Life expectancy at birth for Lewisham male residents remains below the national average, although for females this now exceeds the national average.[29] There are significant differences in life expectancy between the most and least deprived wards. Further, research points to the disparities in impacts of Covid-19 on health and wellbeing, with proportionally higher risks for BAME groups.[30] This data reflects the situation of health inequalities across the Borough given its population profile.

2.8. Physical activity is a key determinant of health and wellbeing as obesity is linked to many serious risks. More than half of Lewisham's adult population is overweight or obese. Whilst the proportion of physically active adults is in line with the national average, roughly 16 per cent of adults are physically inactive. Childhood obesity is also a concern. Some 22 per cent of school children in Reception are overweight or obese, rising to 38 per cent in Year 6. Children living in the Borough's most deprived areas are twice as likely to be obese or overweight as other children.[31]

Figure 2.3 Levels of deprivation in Lewisham

Heritage and character

2.9. The historical growth of Lewisham has led to a range of distinctive neighbourhoods served by a number of commercial centres, each with its own unique character and community. There are contrasts between the preindustrial cores of Blackheath, Deptford and Lewisham in the north of the Borough, the mixed residential neighbourhoods surrounding them and the interwar growth that characterises much of the south of the Borough. Other notable phases of development include the building of post-war estates along with modern commercial blocks and towers.

2.10. Lewisham has a rich and varied historic environment. This includes landscapes, river corridors, parks and open spaces, buildings and structures, urban spaces and the features within them, along with archaeological remains both buried and above ground. The historic environment encapsulates the social and cultural history of Lewisham, its communities and people. The Borough contains over 600 statutory listed buildings, 29 Conservation Areas and the buffer zone of the Maritime Greenwich World Heritage Site.

Housing

[27] Ministry of Housing, Communities and Local Government. English Indices of Deprivation 2019.
[28] Lewisham Poverty Commission. Working Together to Tackle Poverty in Lewisham (2017).
[29] Lewisham Joint Strategic Needs Assessment. Picture of Lewisham (2021).
[30] Public Health England. Beyond the data: Understanding the impact of Covid-19 on BAME groups (2020).
[31] Lewisham Joint Strategic Needs Assessment. Picture of Lewisham (2021).

2.11. Housing affordability is a critical issue for people in Lewisham. Median house prices have risen from £99,995 in 2000 to £430,000 in 2020, an increase of 330% over 20 years. This exceeds the rate of price growth for London during that time. When workplace earnings are factored to account for relative affordability of housing, Lewisham ranks as one of the least affordable boroughs in London. The cost of private renting remains lower than the London average but prices are rising rapidly. Over the period 2010 to 2020 median rents rose by 45 per cent, significantly higher than the rate for London and England.[32]

2.12. There has been a marked change in housing tenure. The private rented sector in Lewisham is growing, mirroring trends across London. The proportion of households with private rents increased from 14 per cent in 2001 to around 23 per cent in 2018. There are also notable variations between wards in terms of housing tenure mix.

Economy

2.13. Lewisham's economy is small and inward looking. There are just 40 jobs for every 100 working age residents, the second lowest proportion of all London boroughs. Local jobs are concentrated in public sector activities, such as health care and education, along with consumer services. Some 90 per cent of businesses are small business. Prior to the peak of Covid-19 the number of new businesses being formed in the Borough was rising but much of this was due to structural changes in the nature of work with higher levels of self-employment and contract work along with expansion of the gig economy. The creative and digital industries sector is one of the fastest growing in London, and Lewisham is now home to one of the Capital's first Creative Enterprise Zones.[33]

2.14. Commercial activity is largely focussed within the Borough's industrial locations and network of town centres. A significant amount of industrial capacity has been lost in Lewisham in recent years, and at a faster rate than the rest of London.[34] There is strong demand for workspace in employment areas and vacancy rates are low. However the limited supply and rising cost of workspace poses a challenge for business development.[35] Town centre vacancy rates have increased across the UK during Covid-19, rising to an average of 14 per cent. Lewisham's larger town centres have been affected by the pandemic as vacancy rates are now slightly above the national average.[36] Covid-19 has also accelerated the growth of online shopping and this is likely to have implications for town centres, particularly the future of traditional bricks and mortar retailing.

Green infrastructure

2.15. Lewisham is well-served by parks, open spaces (including waterways) and nature sites, with green spaces covering roughly one-fifth of the Borough. It ranked first amongst all London boroughs in the recent Good Parks for London report.[37] However there are areas within the Borough that are deficient in public access to open space and nature. There are opportunities to improve the quality of open

[32] Lewisham Strategic Housing Market Assessment (2022).
[33] Lewisham Local Economic Assessment (2018).
[34] Lewisham Employment Land Study (2019).
[35] Lewisham Local Economic Assessment (2018).
[36] Lewisham Retail Impact Assessment and Town Centre Trends Report (2021)
[37] Good Parks for London 2021: Parks and Climate Change (2021).

spaces and nature sites along with the connections between them. Whilst 65 per cent of open spaces have been assessed as being of 'good' quality, 34 per cent are of 'fair' quality and 1 per cent 'poor'.[38]

2.16. Natural capital accounting assesses the environmental, social and economic value of green infrastructure. Research indicates that Lewisham accrues benefits of up to £2.1 billion from its network of green infrastructure.[39]

Environment

2.17. There is substantial evidence that climate change as a result of human activity is linked to increasing frequency and intensity of extreme weather events. It is broadly accepted as one of the key challenges now facing the world. Carbon emissions are a key contributory factor. In Lewisham they have fallen 38 per cent since 2005.[40] However action is required to further reduce emissions and achieve net carbon neutrality. Half of the Borough's carbon emissions come from energy used within homes with the remaining half split between transport and business.[41]

2.18. Lewisham's neighbourhoods and communities must be made more resilient to the effects of climate change, such as heat and flood risk. The Borough's position alongside the River Thames and within the Ravensbourne catchment puts people and properties at risk of flooding. As well, large parts of the Borough are prone to surface water flooding owing to their heavily urbanised nature.

2.19. Air quality is a significant public health issue across London. There are 6 Air Quality Management Areas in Lewisham, including two major areas, which have been declared for several pollutants. The highest concentrations of nitrogen/nitric oxides (NOx), NO^2 and Particulate Matter (PM) which currently breach the legal limits are found on the busiest main roads.[42] London's Ultra Low Emission Zone (ULEZ) was recently extended to cover parts of Lewisham, up to the South Circular (A205 road).

Transport and connectivity

2.20. Despite Lewisham's inner-London location not all of its areas are well-connected or benefit from good access to public transport. The northern and central neighbourhoods are generally better connected to the rest of London with access to the Overground, Docklands Light Rail (DLR) and mainline trains. Public transport access is comparatively poorer in parts of Deptford and neighbourhoods in the south east. This contributes to a relatively high proportion of daily trips being made by car and motorcycle. There is no direct access to the Underground in Lewisham. However the London Plan commits to the delivery of the Bakerloo line extension, which will take it along Old Kent Road to New Cross Gate and beyond.

2.21. Cycling in Lewisham, and London on whole, has shown continued growth over the past decade. The number of daily trips made by cycle in the Borough is rising.

[38] Lewisham Open Space Assessment (2019).
[39] Lewisham Open Space Assessment (2019).
[40] Department for Business, Industrial and Energy Strategy. UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2017 (2019).
[41] Lewisham Climate Emergency Action Plan 2020-2030 (2020).
[42] Draft Lewisham Air Quality Management Plan (2021).

However research indicates that only 7 per cent of 'potentially cyclable' trips in Lewisham are being made by cycle. Road safety is also an area of concern.[43]

[43] Lewisham Cycle Strategy (2017).

3 Vision, strategic objectives and the spatial strategy

Vision for Lewisham

3.1. The Local Plan is focussed on ~~the aspiration to~~ realis~~e~~inge the 'Vision for Lewisham':

3.2. Lewisham will continue to be a welcoming place where the culture and diversity of our people, and the unique qualities of local neighbourhoods, is recognised and protected. We will always celebrate what makes us different and have a strong sense of community. We will give people the security and certainty they need so that everyone can live their best lives.

Lewisham will be a place where all generations not only live but also thrive. A place that people want to visit and live in, and where they choose to stay and enjoy a good quality of life. A place where you can get on, regardless of your background and where you are always treated fairly and are supported to achieve your full potential.

Lewisham will continue to be a dynamic place, reflecting the strength of its communities, and partnership working with our community remains at our core. We are proud of the vibrancy of our high streets, local businesses, arts and cultural establishments, our evening and night-time economy and our world renowned institutions. We will not only protect them but grow them. We will contribute to and share in more of London's future prosperity, becoming a greener, healthier and more resilient place by leading the way in responding to the global climate emergency.

Most of all, we want you to love living in Lewisham.

Strategic objectives

3.3. The ~~following sub-section sets out the strategic objectives for the Local Plan. The~~strategic objectives ~~help to~~ form a link between the Vision for Lewisham and the spatial strategy. They ~~are set in the context of~~address the key challenges facing the Borough now and over the long-term, and represent the main delivery outcomes sought through the implementation of ~~Lewisham's~~ the Local Plan.

3.4. The strategic objectives have been informed by and reflect many of the key documents prepared by the Council, including the Corporate Strategy 2018-2022, along with those published by our partners and other key stakeholders.

3.5. An overarching objective for "An Open Lewisham as part of an Open London" helps to frame the strategic objectives, which are presented across nine themed topic areas. The objectives have been set out this way for organisational purposes and are not listed in order of priority. Many of the individual objectives are crosscutting in that they address more than one of the topic areas.

3.6. Lewisham Local Plan – Strategic objectives

Commented [NE17]: Minor amendments to the phrasing of some objectives to make them more legible.

A	**An Open Lewisham as part of an Open London**
1	Sustain and create inclusive neighbourhoods and communities that both reflect and reinforce the diversity and cultural heritage of Lewisham's people and places.~~, by~~ C~~c~~oordinat~~inge~~ investment in such a way as to promote equality of opportunity and for everyone to enjoy a good quality of life in Lewisham.
B	**Housing tailored to the community with genuinely affordable homes**
2	Proactively respond to population growth and help to meet London's and Lewisham's housing need~~s~~ by positively managing the delivery of new homes across the Borough.
3	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, ~~that~~ which is tailored to meeting the ~~varying~~ varied needs of the community~~.~~. This includ~~inges~~ the needs of those from all age groups and at different stages of life, families and those with specialist housing requirements.
4	Foster and help to reinforce community cohesion through the provision of housing that enables ~~individuals and households~~people to both settle in the local area and remain rooted to it.
C	**A thriving local economy that tackles inequalities**
5	Strengthen Lewisham's role in the wider London economy by expanding the local business base~~, through~~. S~~s~~teer~~ing~~ investment to town centres and other employment hubs and support~~ing~~ 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.
6	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.
7	Ensure town and local centres remain the focus for community activity and harness their unique attributes to support growth, including in retail~~, business~~ and other commercial, leisure and cultural activities ~~with~~whilst promoting a thriving evening and night-time economy.~~ through~~ Coordinate investment to secure Lewisham Major C~~c~~entre's future role as a regionally important Metropolitan C~~c~~entre, ~~to deliver~~enable the regeneration in Catford Major C~~c~~entre into London's greenest, and to support the vitality and viability of town centres elsewhere.
D	**A greener Borough**
8	~~Help London to achieve~~Build on London's National Park City status and ensure all people in Lewisham, including local residents, benefit from access to high quality green space~~s~~, by protecting, enhancing and connecting the Borough's network of parks, open and water spaces~~,~~. This includ~~inges~~ ~~through~~ the delivery of a Green Grid ~~to~~ which improve~~s~~ linkages to and between these spaces.
9	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.

Commented [NE18]: Respond to consultation – request that green industry and transition to circular economy be included as an objective

Commented [NE19]: Updated to reflect the vision of the Catford Town Centre Framework

Commented [NE20]: Respond to consultation – factual update

Commented [NE21]: Respond to consultation – stronger emphasis on species 'extinction' crisis and align with new legislative requirements on BNG

10	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.
E	**Responding to the climate emergency**
11	Realise long-term reductions in energy use and carbon emissions in helping London to become a zero carbon city by 2050~~.~~ ~~by i~~increas~~inge~~ the use of sustainable transport modes ~~–~~ (including walking and cycling)~~–~~ and ensur~~inge~~ that new development is designed to reduce car use, ~~and~~ maximise energy efficiency, ~~along with~~and integrat~~inge~~ greening measures to limit the urban heat island effect.
12	~~Guard against the risk of flooding~~Manage flood risk by ensuring that new development is appropriately located, implementing S~~s~~ustainable D~~d~~rainage S~~s~~ystems, retaining and enhancing flood defences including through river restoration works~~.~~ ~~along with i~~improv~~inge~~ the ecological and water quality of the rivers Thames, Ravensbourne, Quaggy and Pool and their corridors.
F	**Celebrating our local identity**
13	Retain, reinforce and help shape the distinctive character and identity of Lewisham's neighbourhoods and communities, including ~~and~~ 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. ~~– and~~ Ensure new development is designed, constructed and maintained to a high quality standard.
14	Make the optimal use of land ~~to~~ and, where appropriate, 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.
15	Set a positive framework for conserving and enhancing the historic environment, and promoting understanding and appreciation of it~~.~~ ~~including by~~ W~~w~~ork~~ing~~ 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.
G	**Healthy and safe communities**
16	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.
17	Create an environment that encourages and enables people to pursue active and healthy lifestyles irrespective of their age, ability or income, including by ~~promoting~~ applying the Healthy Streets ~~principles~~Approach, making provision for accessible leisure and recreation opportunities and protecting the amenity of residents and visitors, particularly from pollution.
18	Promote cohesive and mixed communities along with walkable and liveable ~~communities~~ neighbourhoods 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.

Commented [NE22]: Respond to consultation – ecological quality added to respond to wider river catchment approach, not exclusively water quality

Commented [NE23]: Respond to consultation – not all localities within OAs will necessary require regeneration and renewal

Commented [NE24]: Respond to consultation – greater emphasis on role of communities in supporting heritage

Commented [NE25]: Amended for consistency with London Plan terminology

Commented [NE26]: Public consultation - Amended for clarity and to reflect objective for walkable neighbourhoods

19	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.
H	**Securing the timely delivery of infrastructure**
20	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.
21	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.
I	**Ensuring high quality education, health and social care**
22	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.

Commented [NE27]: Respond to consultation – additional point added

~~Towards a new spatial strategy~~

~~3.7. The Local Plan will set out a spatial strategy to facilitate the delivery of Good Growth in Lewisham. The spatial strategy provides a clear direction for the development and use of land across the Borough over the long-term. The spatial strategy is also a vital tool used by the Council, its partners and other key stakeholders to guide decisions on investment, particularly for infrastructure and services.~~

~~3.8. The following section sets out some of the key considerations informing the preparation of the spatial strategy for the Borough.[44] It then discusses the spatial strategy options that are being explored for the Local Plan. Finally, the section sets out the 'preferred approach' for the spatial strategy, which is detailed in draft Policy OL1 (Delivering an Open Lewisham).~~

~~**Key considerations**~~

~~Growth requirements~~

~~3.9. The spatial strategy addresses the amount and distribution of development across the Borough. Lewisham's future growth requirements provide a useful starting point for considering spatial options. The Council must plan positively to meet identified development needs, including for housing, workspace and space to accommodate main town centre uses (such as retail floorspace and community facilities). Like the rest of London, Lewisham has gone through a period of rapid growth and this is expected to continue. Many more new homes must be built to meet the needs of a~~

~~[44] The Lewisham Local Plan Integrated Impact Assessment (IIA) – Interim Report (2020) should be referred for further information on the considerations informing the spatial strategy options.~~

growing population.[45] There are also pressing needs for new business space to support and grow the local economy.[46] In order to ensure these needs are addressed the Local Plan must help to facilitate a significant amount of new development.

London Plan

3.10. The London Plan is the spatial development strategy for the region. The spatial options must align with the direction provided by it. This includes focussing growth in Opportunity Areas and highly accessible locations, such as town centres; enabling the delivery of strategic transport infrastructure (such as the Bakerloo line extension) as a means to optimise the development capacity of sites and support growth; directing new investment to regeneration areas; and making better use of out-of-centre retail parks. These priorities are illustrated in Figure 3.1.

Character-led growth

3.11. The character of Lewisham's neighbourhoods is highly valued and contributes to its distinctiveness. Recognising this, we are seeking to facilitate character-led growth so that new development responds to the unique qualities of our localities and communities. The Lewisham Characterisation Study (2019) has been prepared to support the Local Plan. It identifies areas of the Borough where existing character may be reinforced, re-examined or re-imagined, as set out in Figure 3.2. The study provides an indication of opportunities where growth could be accommodated, including the London Plan Opportunity Areas and major centres, along strategic corridors (such as the A21) and in the Bell Green / Lower Sydenham area.

Green and open spaces

3.12. Green and open spaces are vital to the Borough, its people and the environment and will continue to be protected in line with the London Plan and the NPPF. The network of green infrastructure is shown in Figure 3.3. As part of the Local Plan review we have carried out assessments of these spaces[47] to understand whether it would be appropriate to make adjustments to the extent of existing boundaries, as well as to designate or de-designate sites.

Potential development sites

3.13. We have carried out an assessment to identify land that might be available to accommodate new development for a range of uses, as well as the capacity of these sites.[48] As part of this, we have invited the public to identify sites for

[45] The draft London Plan sets a target for Lewisham of 1,667 net new homes per year. Alternatively, a Local Housing Need (LHN) figure calculated using the method set out in the NPPF suggests a minimum housing need figure of 2,964 net units per year.
[46] There is an estimated demand for approximately 5,300 net additional square metres of retail floorspace up to 2030 and 21,800 net additional square metres of employment floorspace up to 2038.
[47] These assessments include the Lewisham Metropolitan Open Land Review (2020), Lewisham Parks and Open Space Assessment (2019) and Re-Survey of Sites of Importance for Nature Conservation in Lewisham (2016).
[48] Further information is set out in the Lewisham Local Plan: Site Allocations Background Paper (2020).

consideration through 'call for sites' exercises. We have also worked with the Mayor of London on a Strategic Housing Land Availability Assessment (SHLAA). A sufficient supply of readily developable sites is crucial to ensuring the Local Plan is deliverable. Figure 3.4 shows the package of strategic sites that we have currently identified.[49]

Figure 3.1: London Plan growth area priorities

Figure 3.2: Lewisham character-led growth strategy from the Lewisham Characterisation Study, 2018

Figure 3.3: Lewisham's network of green infrastructure

Figure 3.4: Land available for development

Spatial strategy options

3.14. Taking into account these key considerations, along with other opportunities and constraints for new development, we have established several spatial strategy options (i.e. reasonable alternatives) that should be considered for the Local Plan. The options address the amount of development that could be accommodated in the Borough, as well as the distribution of this. The options have been assessed through the plan's Integrated Impact Assessment (IIA) – Interim Report (2020). Findings of the IIA have been used to inform the 'preferred approach' for the spatial strategy.

3.15. The draft London Plan identifies the Bakerloo line extension (BLE) as a strategic transport infrastructure priority. Once delivered, the BLE will have a transformative effect in Lewisham by significantly enhancing transport accessibility in many parts of the Borough and improving links to south east London. It will also play an instrumental role in generating new investment and helping to unlock the development potential of sites.

3.16. Funding for the BLE has not yet been committed. It is therefore necessary to take a pragmatic approach to the BLE by planning positively to secure its delivery, but recognising that some or all phases may not be delivered within the plan period. We have therefore established 3 main scenarios with different assumptions on the BLE delivery, as follows:

- Scenario 1 – No BLE (Figure 3.5)
- Scenario 2 – BLE Phase 1 (Figure 3.6)
- Scenario 3 – BLE Phase 1 and 2 (Figure 3.7)

3.17. For each BLE scenario two spatial options have been established. Accordingly, six reasonable alternatives are being considered. An illustrative summary of the options for each scenario is presented in the maps below. These explore the potential to optimise the capacity of sites to meet the Borough's identified needs, particularly for housing, in the context of supporting Good Growth.

[49] The 'strategic' sites are mainly 0.25 hectares or greater in size.

3.18. The IIA should be referred for further details on the options as well as assessments of their likely social, environmental and economic impacts.

Figure 3.5 Spatial options 1a and 1b (No BLE)

Figure 3.6 Spatial options 2a and 2b (BLE Phase 1)

Figure 3.7 Spatial options 3a and 3b (BLE Phase 1 and 2)

The preferred approach is illustrated in **Figure 3.8**

3.19. Additional alternatives have been considered but discounted. They include the options to focus new development and growth exclusively within the London Plan Opportunity Areas and to distribute growth more evenly across the Borough. These options have been discounted because they are not considered to be reasonable. They would inhibit the Council from meeting identified needs, owing to the lack of development sites and infrastructure to support their delivery.

Figure 3.5: Scenario 1 options – No BLE

Figure 3.6: Scenario 2 options – BLE Phase 1

Figure 3.7: Scenario 3 options – BLE Phase 1 and 2

The preferred approach

3.20. In the absence of certainty over the delivery and timing of the BLE, the preferred approach aligns with Scenario 1. However, there is also a need to ensure the Local Plan sets out a clear framework to secure the delivery of the BLE, and to maximise its role and benefits in supporting Good Growth. Therefore, the preferred approach allows sufficient flexibility to respond quickly to the phased delivery of the BLE. This will provide that the development capacity of local areas and sites can be optimised, aided by significant improvements in public transport accessibility, whilst ensuring sufficient infrastructure is in place to support Lewisham's neighbourhoods. The preferred approach is also a character-led response to managing growth over the long-term, one which seeks to respect and enhance the distinctive qualities of the Borough's natural, built and historic environment.

Figure 3.8: Proposed growth strategy

Figure 3.9: Borough-wide spatial strategy plan

Commented [NE28]: Not required for Regulation 19 plan

OL 1 Delivering an Open Lewisham (spatial strategy)

Commented [NE29]: Policy amended throughout to make more concise and to aid implementation – policy principles retained

A. The Council will work positively and alongside local communities, and community groups, and other public and private sector stakeholders, development industry partners and the wider public to realise the Vision for Lewisham , and to deliver address the strategic objective for 'An Open Lewisham as part of an Open London'. Good Growth will be delivered in the Borough by:

   a. Ensuring that the growth and regeneration potential ofDirecting new development to Growth Nodes, Regeneration Nodes and well-connected sites, including in Lewisham's London Plan Opportunity Areas are fully

Commented [NE30]: Amended to aid policy implementation, consistent with the key diagram

Commented [NE31]: Respond to consultation – well connected sites in OAs should be signposted as suitable areas for growth and regeneration

~~realised, specifically at~~of New Cross ~~/~~-Lewisham ~~/~~-Catford and Deptford Creek ~~/~~-Greenwich Riverside, and carefully managing growth in these locations in response to local character~~, including by preparing and implementing local area frameworks, such as the New Cross Area Framework and the Catford Town Centre Master Plan~~;

b. Directing new development and investment to the Borough's strategic Area for Regeneration, and other local areas for regeneration, and coordinating the delivery of this investment to help tackle ~~deprivation~~ the environmental, social and economic barriers that affect the lives of people in these areas, and ensure equality of opportunity;

c. ~~Promoting a vibrant and diverse multi-centred Borough by directing~~ Directing new residential, commercial, community, leisure and cultural development to Lewisham's town and local centres in order to support their vibrancy, vitality, viability and long-term resilience, and through this process:
   i. Enable Lewisham ~~town~~ Major C~~c~~entre to cement its position as a centre of sub-regional significance and ~~achieve~~ be designated as a M~~m~~etropolitan C~~c~~entre ~~status~~in a future review of the London Plan;
   ii. Facilitate the comprehensive regeneration of Catford M~~m~~ajor ~~town~~ C~~c~~entre to reinforce its role as the principal civic and cultural hub within the Borough; and
   iii. Ensure the D~~d~~istrict ~~town~~ C~~c~~entres at Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross and Sydenham retain their distinctive ~~features~~ character whilst evolving in their function as key hubs of community, cultural and commercial activity;

d. ~~Facilitating~~ Directing new development along the ~~north-south~~ A21 C~~c~~orridor ~~(Lewisham High Street, Rushey Green and Bromley Road)~~ and other strategic Growth ~~c~~Corridors ~~(such as the east-west New Cross Road / A2 corridor) as well as around principal transport routes, nodes and interchanges,~~ to support growth, ~~and~~ along with using the Healthy Streets Approach to enhance the quality of places~~. This includes improvements to and better link~~improve connections within and between ~~Lewisham's town centres and~~ neighbourhoods ~~with each other and those in adjoining Boroughs, using the Healthy Streets approach~~;

e. ~~Working with partners to~~Securing the delivery of new and improved ~~community and strategic transport~~ infrastructure~~, including the Bakerloo Line extension,~~ as a catalyst for investment and to unlock the development potential of sites across the Borough~~. This is particularly in the~~ The delivery of the Bakerloo line extension will both support and enable growth in ~~London Plan~~ Opportunity Areas and Lewisham's southern areas, including Bell Green and Lower Sydenham~~; where interventions and transformational change can positively address inequalities and local deprivation. Over the long-term, the delivery of infrastructure will support the designation of a new Opportunity Area at Bell Green and Lower Sydenham in the London Plan.~~

f. ~~Proactively seeking to make~~ Making the best use of land and space by ~~, and~~ prioritising the redevelopment of brownfield land of low or negligible ecological value ~~for new housing and workspace , along with optimising the~~

Commented [NE32]: Respond to consultation – caveat on brownfield land for consistency with national policy/guidance

~~development of strategic sites and other smaller sites across the Borough, including through their~~and enabling the sensitive intensification of established residential neighbourhoods and commercial areas, including through the development of small sites;

g. ~~Requiring~~ Ensuring all new development proposals~~to be~~ follow ~~delivered through~~ the design-led approach to make the optimal use of land, ~~and informed by an understanding of~~respond positively to local ~~area character~~distinctiveness (including the historic, cultural, natural and built environment), ~~to enhance local distinctiveness,~~ and ~~to~~ helps to secure inclusive, safe, liveable, walkable and~~,~~ healthy ~~and safe communities that are inclusive to all~~neighbourhoods;

h. Protecting, enhancing and connecting Lewisham's network of green infrastructure (including trees, parks and open spaces, water spaces and biodiversity), as well as improving the population's access to it ~~through~~ by walking and cycling;~~,~~ ~~as an integral component of Good Growth along with~~

~~h.~~i. E~~e~~nsuring that a strategic and coordinated approach is taken by the Council and its partners to ~~all new development~~ respond~~s~~ to the climate emergency~~, with~~ and requiring new development to integrate measures for climate change adaptation and mitigation.

Explanation

3.21. ~~This policy~~ is the overarching ~~strategic~~ policy for the Local Plan and is the starting point for achieving the Vision for Lewisham and responding to the plan's strategic objectives. It sets out the spatial strategy for the Borough~~.,~~ ~~which~~ This is the land use and planning framework for the Council and its partners to manage growth and development, as well as to guide new investment ~~over the next 20 years~~up to 2040. ~~The spatial strategy directly addresses the Local Plan objectives, including the overall objective of 'An Open Lewisham as part of an Open London'.~~ The policy provides a key link between the Local Plan and the London Plan. It will help to ensure that Good Growth is delivered in a way that responds to Lewisham's distinctiveness.

3.22. ~~This policy is also the platform for the remainder of the Local Plan. All of the other plan policies emanate from this principal policy and provide further details and guidance to assist with its implementation. It is an important reference point for all future planning proposals and establishes the strategic land use priorities that new developments will be expected to engage with.~~

3.23. ~~Finally, the policy helps to address the 'Good Growth' policies set out in the draft London Plan. Lewisham has an important role to play in helping to deliver the London Mayor's vision for the Capital. London's future prosperity is very much dependent on coordinated planning of infrastructure and development. This requires Lewisham Council and other local authorities, along with key stakeholders, to work together to realise sustainable and equitable growth both within and across their administrative boundaries. The policy establishes a critical link between the Local Plan and the London Plan. It helps to ensure that~~

Commented [NE33]: Respond to consultation – making the optimal use of land should be signposted in strategic policy, for consistency with the London Plan

Commented [NE34]: Respond to consultation- emphasis that design-led approach used to respond positively to local distinctiveness (rather than enhance it)

Commented [NE35]: Respond to consultation – stronger strategic approach to climate change in OL1

Commented [NE36]: Policy supporting text amended throughout to include factual updates and make more concise

~~Lewisham's growth is managed in line with the spatial development strategy for the region.~~

~~Realising~~ Opportunity Area~~s objectives~~

3.7. The London Plan identifies two Opportunity Areas within Lewisham. These are the New Cross/Lewisham/Catford corridor and the area at Deptford Creek/Greenwich Riverside. Opportunity Areas are "significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity"[50]. The London Plan requires the Local Plan to set a strategy for facilitating growth and regeneration within these areas and maximising their development potential. ~~that have significant potential to accommodate new investment along with growth in homes and jobs. These are also areas where neighbourhoods, businesses and local residents stand to benefit from focussed regeneration and urban renewal, particularly where deprivation is experienced. These benefits will be realised through the delivery of more healthy and liveable neighbourhoods. This includes more genuinely affordable homes, new workspace, high quality community facilities and transport infrastructure, along with public realm and environmental improvements. The Opportunity Areas comprise the New Cross / Lewisham / Catford corridor and the area at Deptford Creek / Greenwich Riverside.~~

~~3.24.~~3.8. In recent years there has been a significant amount of new development and investment within Lewisham's Opportunity Areas~~them in these areas, which has been steered by the local planning framework~~. A number of ~~strategic~~ large ~~development~~ brownfield sites have now been ~~delivered~~ redeveloped or are expected to come forward soon, with planning consent granted and/or construction started. These new developments have already delivered, or are committed to provide, ~~The areas have also benefited from the delivery of~~ many more new homes including affordable housing, modern workspace and community facilities, ~~or~~ along with new and improved transport infrastructure, open space and~~,~~ other public realm enhancements.~~and community facilities~~.

~~We will continue to seek to deliver the objectives for the Opportunity Areas through the Local Plan, working with the Greater London Authority and other key stakeholders alongside development industry partners and local communities. Additional guidance has been prepared to identify future priorities and opportunities for development and area improvements, including the New Cross Area Framework and the Catford Town Centre Masterplan. The Local Plan reflects this guidance through the spatial strategy and other policies. All future development proposals will be expected to positively engage with the Local Plan and its associated guidance to ensure the Opportunity Areas fully realise their potential, whilst taking account of local area requirements.~~

3.9. There remain significant opportunities for growth and regeneration within the New Cross/Lewisham/Catford Opportunity Area. New development will be facilitated through the consolidation and intensification of underused and vacant industrial

[50] London Plan (2021), paragraph 2.2.1.

sites, the revitalisation and renewal of larger town centres, particularly Lewisham and Catford Major Centres, and the intensification of land along key movement corridors such as the A21 and A2 Growth Corridors. Growth and regeneration will be aided by the delivery of new and improved transport infrastructure, which will help to unlock the development potential of sites. This includes the arrival of the Bakerloo line extension at New Cross Gate linking to Lewisham town centre with a modernised station interchange. The re-routing of the South Circular (A205) at Catford will enable the regeneration and transformation of the Major Centre. The Council has prepared guidance documents for the Opportunity Area which have both informed the Local Plan and will support its implementation. These include the New Cross Area Framework, A21 Development Framework, Catford Town Centre Framework and the Surrey Canal Triangle SPD.

~~3.25.~~3.10. The Deptford Creek/Greenwich Riverside Opportunity Area will also be a focus for growth and regeneration, building on the area's distinctive character and strong relationship with the waterway network. New development will be facilitated mainly through the consolidation and intensification of employment sites. This will enable the delivery of new employment-led, mixed use development and transformational public realm enhancements. The scale of growth and design of development will be carefully managed in order to ensure the area's maritime and industrial heritage is preserved, enhanced and better revealed. The wider area benefits from the presence of world renowned educational and cultural institutions, which will provide a focus for community activity with linkages to the Deptford Creekside and New Cross Cultural Quarters as well as the historic High Streets of Deptford and New Cross.

Commented [NE37]: Respond to consultation – further details about managing growth in Opportunity Areas

Tackling deprivation and ensuring equality of opportunity

~~3.26.~~3.11. It is vitally important that everyone is able to enjoy a good quality of life ~~in Lewisham~~ irrespective of their background, age or ability. ~~We are committed to ensuring that local residents and others are able to benefit from excellent 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.~~ Whilst there are many prosperous neighbourhoods in Lewisham there are some localities where ~~access to social and economic opportunities is more limited, and where the~~environmental, social and economic barriers adversely affect peoples' lives~~impacts of inequality and causes of deprivation are concentrated~~. Some of these localities are within the 20 per cent most deprived in the country~~, including in Lewisham's southern neighbourhoods~~. The Local Plan seeks to tackle deprivation ~~sets a proactive strategy to~~by ~~coordinate and direct~~coordinating new investment ~~to~~ within these areas. It also highlights for our stakeholders and delivery partners the need for targeted interventions to ~~tackle~~ address the specific causes of deprivation and ~~to ensure equality of opportunity~~ inequality. This includes investment in the built and natural environment ~~and supporting~~ as well as programmes for education, training, health and social care. Deprivation is most prevalent in Opportunity Areas, ~~as well as~~ the Strategic Area for Regeneration and Regeneration Nodes~~, whether linked to capital or revenue funding~~. ~~Further details on the strategic approaches to tackle deprivation through the Local Plan are set out in Part Three.~~

~~A vibrant and diverse, multi-centred borough~~Thriving and resilient town centres

~~3.27.~~3.12. The Local Plan seeks to ~~promote~~ ensure that Lewisham ~~as a multi-centred, or polycentric, Borough. This is one that is defined by~~ features a well-connected network of ~~complementary,~~ thriving and resilient town centres ~~which act as hubs both serving and linking local communities~~. The spatial strategy directs new development to town centres and their surrounds. It supports the '15-minute neighbourhood' concept, where centres provide people with most of their needs within a short walk or cycle journey from their home. This pattern of development is advocated to facilitate and better balance growth as well as to redress the distribution of investment locally, ultimately, to ~~promote and improve~~ make neighbourhoods more sustainable and ensure equality of opportunity across Lewisham.

Commented [NE38]: Respond to public consultation – recognition that plan and spatial strategy is supporting '15-minute' neighbourhood concept

~~3.28.~~3.13. ~~This policy seeks to direct new development to the Borough's town and local centres and their immediate surroundings, especially the major and district centres. These are locations that already~~The Borough's town centres ~~benefit from~~ tend to have higher ~~levels of public transport access~~ibility and transport interchanges, Public Transport Access Levels along with a ~~core~~ concentration of services and community facilities, making them well-placed to accommodate more people and activities. New development can support town centre vitality particularly where larger schemes deliver public realm and townscape improvements. ~~Furthermore,~~ T~~t~~here are also opportunities to secure the long-term viability of ~~these~~ town centres through the introduction of a wider range of uses~~,~~ including housing, workspace, cultural uses and community facilities. ~~The Local Plan seeks to optimise the use of land available in and around town centres. This includes diversifying and intensifying uses within them whilst ensuring that the scale of development is commensurate with, and helps to reinforce, a centre's role and function.~~

~~3.29.~~3.14. ~~For this approach to be successful~~ It is imperative that town centres complement and support but do not compete with one another. Therefore, the Local Plan seeks to build on the unique attributes, character and function of each of the Borough's town and local centres. As these centres will be key focal points for growth and new development ~~and investment~~ they are expected to evolve over time, responding to the challenges facing our high streets and becoming even more liveable, vibrant and resilient places. Further details about the character and role of Lewisham's town and local centres, along with parameters for development within and around town them, are set out in Part 2 and Part 3 of the Local Plan.

~~3.30. There are key opportunities at the major town centres of Lewisham and Catford, both of which are located within the Opportunity Area. 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 in the wider sub-region as a transport interchange as well as a significant hub of commercial and community activities. We will seek to facilitate development in such a way as to position the centre to secure this metropolitan centre status within the plan period.~~

~~3.31. We will also seek to deliver the comprehensive regeneration of Catford major centre as a strategic priority. Catford will continue to play an important complementary role to Lewisham as the principal civic centre in the Borough,~~

supported by its unique cultural offer along with opportunities to deliver additional housing, commercial floorspace and transformational public realm improvements. We have prepared the Catford Town Centre Masterplan to set a future framework and implementation programme for the centre, which should be considered alongside the Local Plan.

3.32. Elsewhere, the Borough's district centres will be the focus for growth, renewal and sensitively managed change, aided by investment in strategic infrastructure and other area improvements. This includes the district town centres of New Cross, Deptford, Downham, Lee Green, Forest Hill and Sydenham. Local Centres will also be required to play an integral role in supporting Lewisham's linked network of centres.

Commented [NE39]: Repetition – covered elsewhere in plan

Connecting communities: corridors for movement and improvement Growth Corridors

3.33.3.15. To achieve a successful multi-centred Borough it is vital that there are legible,The delivery of Good Growth will require that people are enabled to live car-free lifestyles and travel mainly by walking, cycling and public transport. To make this happen Lewisham will need to be supported by an excellent public transport system along with a network of high quality, safe and efficient walking routes and cycleways. Good connections both to and between town centres, parks and green spaces and residential neighbourhoodsareas are integral to liveable neighbourhoods. Crucially, such routes must support sustainable modes of movement by giving priority to walking, cycling and the use of public transport. Also, tThe future prospects andlong-term viability of Lewisham's town centres and other employment locations 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.

3.34.3.16. The London PlanThe Opportunity Areas define a central growth corridor in Lewisham.. which This covers a large area to the north of the BoroughDeptford and extends southward taking in the town centres at New Cross, Lewisham and Catford. This corridor features a principal road network, centred on theThe A21 corridor road (Lewisham High Street, Rushey Green and Bromley Road) is the principal north-south route within this corridor. Elsewhere there are several strategic major roads linking town centres and neighbourhoods both within and beyond the Borough boundary. These roads includinge: 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). It is acknowledged that some Growth Corridors include Conservation Areas and other heritage assets, or fall within their setting, and therefore growth will need to be carefully managed in a way that responds positively to local historic character.

Commented [NE40]: Respond to consultation – reflect on the need to carefully manage growth where heritage assets concerned

3.35. 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 - by give priority to movement by walking and cycling, as well as addressing vehicular dominance and reducing vehicle speeds. These principles are covered elsewhere in the plan, including Policy TR3 (Healthy streets as part of healthy neighbourhoods).~~

Commented [NE41]: Rephrased in paragraph below for clarity

3.17. These main roads currently prioritise vehicular movement. They are car-dominated, often suffer from congestion and adversely impact on local amenity, for example, by contributing to noise and air pollution. The major roads and their surrounds can be transformed into safer, healthier and more attractive places by using the Healthy Streets Approach. To achieve this it will be necessary to rebalance the 'link' function of the roads, giving priority to movement by foot, cycle and public transport, and also enhancing their 'place' qualities. Investment within the growth corridors will be necessary deliver Healthy Streets. The Local Plan therefore directs new development along the main roads and supports the intensification of sites along them. Part 3 of the Local Plan includes site allocations where new development will be required to deliver public realm and other area enhancements. The A21 Development Framework and New Cross Area Framework will support the implementation of this policy.

~~Strategic infrastructure: the catalyst for growth and investment~~Securing infrastructure to support our neighbourhoods and communities

~~3.36.~~3.18. ~~In order to achieve the objective of an Open Lewisham I~~it is imperative that ~~all residents are~~everyone in Lewisham is able to share in the opportunities and benefits that growth and regeneration bring. ~~We will therefore~~The Council will continue to work with its key stakeholders and development industry partners to deliver the ~~essential~~ infrastructure ~~needed to support and enhance our~~ Lewisham's neighbourhoods and communities need. We have prepared an Infrastructure Delivery Plan (IDP) which will be used to inform planning and investment decisions. This will help us to secure infrastructure where and when it is needed. Further details are set out in Part 4 of the Local Plan.~~In addition, we will lobby for and seek to secure strategic infrastructure of the type that can act as a catalyst for growth and investment, and which can help the Borough to fully realise its development potential~~.

~~3.37.~~3.19. ~~There are localities in the Borough, particularly where deprivation is experienced, which could benefit from the investment associated with new development. However opportunities are constrained owing to the lack of infrastructure provision, particularly transport infrastructure.~~ Despite being an inner-London borough some parts of Lewisham are poorly served by public transport. This is a key factor influencing the deprivation experienced by people in the Borough. We have prepared "A Vision for Rail"[51] ~~that~~ which sets out our priorities to

[51] Lewisham Council - A Vision for Rail (2017)

address ~~identified~~ gaps in ~~such~~ transport provision, and to ensure Lewisham is able to appropriately support London's growth. ~~Of key significance is the Bakerloo line extension, which is supported by the draft London Plan. It is proposed that this Underground line is extended from Elephant and Castle to Lewisham via Old Kent Road and 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 and Lower Sydenham~~.

3.20. The London Plan commits to extend the Bakerloo line ~~extension~~ on the Underground (tube) from Elephant and Castle to Lewisham via Old Kent Road and New Cross Gate. This would enable a potential further southward extension beyond Lewisham, although the route selection for the second phase of the BLE remains at an early stage and is subject to further development and public consultation by Transport for London. On 1st March 2021 the Secretary of State for Transport issued safeguarding Directions for the Bakerloo line extension (BLE).[52]

~~3.38.~~3.21. The BLE is essential to supporting ~~Opportunity Area objectives and providing~~London's growth, and will help to ~~the necessary transport infrastructure to~~ facilitate ~~a significant uplift~~the delivery of many more new ~~in~~ homes and jobs in the New Cross/Lewisham/Catford ~~corridor~~Opportunity Area. ~~Furthermore, t~~The potential ~~future~~ further extension of the Bakerloo line ~~line to the southern part of the~~will also support ~~Borough is imperative to enable transformative~~ transformational investment and ~~managed change~~growth in the ~~. In particular, the~~ Bell Green and Lower Sydenham area and ensure the capacity of sites is optimised. ~~is poised to benefit from such focused investment. This area currently exhibits some of the highest levels of deprivation locally, and within the highest 20% deprived nationally, 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 strategically coordinated way.~~ The Council envisages a~~A~~ future London Plan Opportunity Area ~~is envisaged for this part of the Borough~~here, linked to the BLE, and we will continue to work with the Mayor of London on planning for this part of the Borough. ~~The spatial strategy is set with the intent of facilitating investment as a catalyst for growth, to help realise long-term objectives for a more equitable distribution of development and opportunities across the Borough.~~ The Local Plan sets a framework to secure the delivery of the BLE and to maximise its potential in supporting Good Growth and generating new inward investment. However, as full funding for the project has not yet been secured a pragmatic approach is necessary. The spatial strategy is therefore not dependent on the BLE and can be achieved in its absence. At the same time, the Local Plan policies provide flexibility to respond to the phased delivery of the BLE over the medium to long-term.

Making the best the use of land and space

~~3.39.~~3.22. Lewisham will continue to play a role in accommodating London's future growth. Whilst growth will bring many opportunities and new investment it will also

[52] The Direction relates to the extension proposed to be constructed to the Bakerloo line to Lewisham via Old Kent Road and New Cross Gate. It should be referred for further information on the extent of Areas of 'Surface Interest' and 'Areas of Subsurface Interest'.

Commented [NE42]: Incorporated into paragraph below

Commented [NE43]: Public consultation – clarification points added regarding commitments, safeguarding and phasing of the BLE

Commented [NE44]: Respond to consultation – reflect that transformational investment not contingent on BLE but will help to ensure capacity of sites is optimised

Commented [NE45]: Respond to consultation – clarity required on approach to spatial strategy, and relationship with the BLE

lead to increasing and competing pressure on the use of land. In response to this ~~situation,~~ the Local Plan sets a framework to help ensure that the best use is made of the Borough's limited supply of land ~~and space~~. The spatial strategy directs higher density and mixed-use development to well-connected locations and other areas where new investment will support regeneration. It is complemented by the Part 2 policies which set requirements to ensure that new development is designed to a high quality standard and makes the optimal use of land. For example, by making provision for the co-location of uses or designing buildings and spaces which are adaptable to the needs of different activities and users.

~~3.40. Making the best use of land will mean that land is used more efficiently and flexibly. This includes well-integrated, higher density and mixed-use development in appropriate locations. These locations are principally Lewisham's Opportunity Areas and town centres along with the strategic corridors for movement that connect these places. As well, a more intensive use of employment land and sites will be necessary to meet future needs for workspace and job opportunities.~~

~~3.41. Making the best use of land will also mean that land and space is used more effectively. This can be achieved through the shared use or co-location of facilities to better meet the needs of the people and groups who use them. A more effective use of land can also occur where buildings and spaces are designed to be adaptable to different users and offer opportunities for use at different times of the daytime, evening and week. The introduction of car-free or car-capped developments in highly accessible locations, such as town centres, together with high quality public realm can also provide for a more effective use of land.~~

~~3.42. Where appropriately located, higher density and mixed-use developments that respond positively to and enhance the character of the Borough's town centres and neighbourhoods will be supported. This is to help secure their long-term vitality and viability by enabling a complementary cluster, or agglomeration, of uses to develop. A critical mass of people and activities is needed to both generate and support investment, such as for community facilities, public realm enhancements and other area improvements.~~

Commented [NE46]: Repetition – covered elsewhere in plan

~~3.43.~~3.23. ~~This~~ The ~~policy seeks~~spatial strategy prioritises the redevelopment of brownfield land, or previously developed land~~, as a priority~~ of low or negligible ecological value. This will ensure that Lewisham's green and open spaces are protected and opportunities are taken to enhance the ecological value of brownfield sites. ~~The~~ Part 3 of the Local Plan includes ~~a number of strategic~~ site allocation~~s~~ policies ~~where requirements have been set~~ to ensure that the ~~optimal~~ best use of land and optimal capacity of sites is realised. These ~~allocations~~ are ~~largely set~~mainly located within the Opportunity Areas, Growth Nodes, Regeneration Nodes, town centres and along strategic ~~movement~~ corridors. ~~where we will seek to focus development. Further details are set out in Part Three of this document dealing with Lewisham's character areas.~~Elsewhere, the sensitive intensification of established residential neighbourhoods and commercial areas will be supported. This will be enabled by mainly by the redevelopment of small sites.

Commented [NE47]: Amended for consistency with Key Diagram

Celebrating Lewisham's diversity and enhancing its distinctiveness

~~3.44. 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.~~

~~3.45.~~3.24. ~~We recognise that good design is integral to good planning.~~ The Local Plan ~~therefore sets a clear framework for improving the quality of places, and~~ requires all ~~proposals for~~ new development to be delivered through a design-led approach. This means that new development must be based on an understanding of the site context and respond positively to the Borough's local distinctiveness. The use of the design-led approach will help to ensure that ~~those~~ the unique and valued features of our ~~communities~~ neighbourhoods remain at the heart of the spatial strategy, and are fully considered in planning decisions.

~~3.46.~~3.25. Lewisham has been shaped by its historical development. It will continue to evolve in the context of London's growth and new technological advances. ~~However~~ R~~, r~~especting local character and accommodating ~~change~~ growth should not be seen as mutually exclusive. New development must help to reinforce the special characteristics of the Borough. At the same time, it should assist in repairing and re-shaping those elements of the built environment that could make a more positive contribution to the visual quality and liveability of our neighbourhoods. ~~The Lewisham Characterisation Study (2019) has been prepared by the Council in collaboration with the local community, and assists in setting out some of the defining features of the Borough. The study has been used to inform the Local Plan approach for integrated place making, including the planning priorities for Lewisham's neighbourhoods and areas. Part Three of the Local Plan sets out further details in this respect.~~

Commented [NE48]: Repetition – covered elsewhere in plan

Commented [NE49]: Repetition – covered elsewhere in plan

A greener, more resilient borough

~~3.47.~~3.26. The Council ~~takes seriously its responsibility to~~is committed to promot~~ing~~e and secur~~ing~~e sustainable development~~.~~. ~~as evidenced by our declaration of a~~We have declared a climate emergency and ~~commitment to~~ prepare~~d~~ a~~n~~ Climate Emergency A~~a~~ction P~~p~~lan which will work in tandem with the Local Plan.[53]~~.~~ Sustainable development means development that meets the needs of the present without compromising the ability of future generations to meet their own needs.[54] Environmental stewardship is an integral part of this. London's natural assets are an irreplaceable resource and need to be ~~preserved~~ conserved and protected. However, they are coming under increasing pressure from human activity, including that which is contributing to global climate change.

~~3.48.~~3.27. The Local Plan sets a framework for managing Good G~~g~~rowth ~~and change~~ with environmental considerations fully integrated into the planning and development process. It sets out our approach to protecting and enhancing the local network of green infrastructure, parks and open spaces~~,~~ and the water environment ~~and biodiversity~~. As well, it provides the local land-use strategy for mitigating the Borough's impact on global climate change, whilst ensuring ~~local~~

[53] Lewisham's Climate Emergency Action Plan (March, 2020).
[54] The Bruntland Report - Resolution 42/187 of the General Assembly of the United Nations

neighbourhoods are made more resilient and well placed to adapt to the consequences of it. Part 2 and Part 3 of the Local Plan set out further detailed requirements for new developments.

~~3.49. The spatial strategy responds to the climate emergency by seeking a more compact and efficient urban structure, one with a well-linked network of places and finer integration of land uses and activities. It does not necessitate that development is directed to greenfield sites, ensuring that our green spaces along with the biodiversity and habitats within them are protected. It also enables opportunities to decrease carbon emissions, such as by reducing reliance on automobiles and the need to travel long distances, as well as enabling the conglomeration of uses to support district heating and other sustainable energy options. These are just a few of the benefits offered by the approach.~~

~~Furthermore, as detailed elsewhere in the plan, all development proposals will be expected to demonstrate through the design-led approach how they will contribute to protecting and enhancing the environment, delivering net gains in biodiversity and green infrastructure wherever possible, whilst also providing for safe, healthy and resilient communities.~~

Commented [NE50]: Repetition – covered elsewhere in plan

Part Two:

Managing development

4 Managing development

4.1. Part Two of the Local Plan forms a key part our approach to managing new development across the Borough. It includes policies that will help to facilitate the delivery of Good Growth whilst ensuring Lewisham's distinctiveness is recognised, celebrated and enhanced. The following section sets out planning policies across a range of ~~of~~ topic areas that all new development proposals will be required to comply with.

~~4.2.~~ It is important that the following Part Two policies below are not considered in isolation of other elements of the Local Plan, which must be read as whole. All development proposals should address how they will contribute to the achievement of the Local Plan's strategic objectives and the spatial strategy for the Borough, as set out in Part One, and further support the priorities for Lewisham's neighbourhoods and places included in Part Three.

5 High quality design

~~What you've told us~~

~~The character and identity of Lewisham's neighbourhoods is highly valued.~~

~~There are mixed views about whether:~~

- ~~Some new developments are harmful to local character~~
- ~~High rise buildings and tower blocks should be allowed~~

~~People would like to see:~~

- ~~Stronger protection for the cultural and natural environment~~
- ~~Safer and attractive public spaces~~
- ~~Guidelines for smaller developments, such as basements and extensions~~

~~What we've learned~~

~~Lewisham has a distinctive character and identity~~

- ~~The development of Lewisham over time has shaped the character and identity of our neighbourhoods and communities today.~~

~~Key parts of the borough's character are~~

- ~~Natural features, such as green spaces and rivers~~
- ~~Town centres~~
- ~~Residential areas~~
- ~~Views (some of which lead to landmarks, such as the view from Blackheath to St Paul's Cathedral)~~

~~Diversity shapes experiences~~

~~Lewisham is home to people of many backgrounds, ages and abilities who use and experience buildings and spaces differently.~~

~~Main Issues~~

~~Local character~~

~~Lewisham's growth must be carefully managed so local character is enhanced and not harmed.~~

~~Density~~

~~To meet pressing needs for new homes and jobs it will be necessary to build to higher densities in some places, including with taller buildings.~~

~~Inclusive places~~

~~To create more inclusive places, buildings and spaces must be easy to access and use for people of all ages and abilities and at different stages of life.~~

~~We're proposing to...~~

~~Ensure growth is character-led~~

- ~~Require new development to contribute positively to local character x~~
- ~~Identify and protect important views, vistas and landmarks~~
- ~~Encourage developers to consult with communities when designing schemes and to treat proposals more favourably when this is done effectively~~

~~Promote inclusive and liveable neighbourhoods~~

- ~~Create safe and attractive public spaces that are accessible to all~~
- ~~Use London Plan standards for new housing, including indoor living and outdoor amenity space~~
- ~~Ensure development avoids and mitigates harm to the environment, and does not pose a risk to public health and safety~~

~~Make the best use of land~~

- ~~Ensure the density and mix of new development is right for its location.~~
- ~~Identify places where tall buildings may be appropriate, and only allow them if they meet our high design standards.~~

~~We've also considered~~

- ~~Setting density standards for new developments in different areas or locations~~
- ~~Setting limits on the height of tall buildings~~

Commented [NE51]: Not required for Regulation 19 plan

QD 1 Delivering high quality design in Lewisham

Using the design-led approach

A. ~~All new d~~Development proposals must follow a design-led approach to contribute to delivering high quality, inclusive, safe, healthy, liveable and sustainable neighbourhoods in Lewisham. This requires the consideration of design options at the early stage of the development process informed by an understanding of the site and its local context, including through effective engagement with the local community. These design options should then be used to determine the most appropriate form of development that responds positively to the local context, along with the optimal use of land to support the delivery of the spatial strategy for the Borough.

Distinctive and valued places

B. ~~Lewisham is a diverse Borough comprising many neighbourhoods with distinctive identities and characteristics. All d~~Development proposals must demonstrate an understanding of the site context and respond positively to Lewisham's local distinctiveness by providing for ~~by delivering~~ buildings, spaces and places that reinforce and enhance local character. This includes the special and distinctive visual, historical, environmental, social and functional qualities of places that contribute to local character, identity, sense of community and belonging. ~~as well as promote inclusive neighbourhoods and communities.~~

~~C. Development proposals will be supported where they reinforce and enhance the special and distinctive visual, historical, environmental, social and functional qualities of buildings, spaces and places that positively contribute towards local identity, character and sense of community.~~

~~D.~~C. To successfully respond to local distinctiveness development proposals ~~should~~ must be designed to address:

a. Natural features including trees, landscape, topography, open spaces and waterways;
b. The prevailing or emerging form of development (including urban grain, building typology, morphology and the hierarchy of streets, routes and other spaces);
c. The proportion of development (including height, scale, mass and bulk) ~~both~~ within the site, ~~in the~~its immediate vicinity ~~of the site~~ and the surrounding area;
d. Building lines along with the orientation of and spacing between buildings;
e. Strategic and local views, vistas and landmarks;
f. Townscape features;
g. The significance of heritage assets and their setting; ~~and~~
h. Architectural styles, detailing and materials that contribute to local character; and
~~h.~~i. Cultural assets.

Commented [NE52]: Respond to consultation – clarification that design-led approach must address both site and its wider local context

Commented [NE53]: Amended to make more concise – this point is reflected throughout the plan

Commented [NE54]: Incorporated into B above.

Commented [NE55]: Respond to consultation – more emphasis on cultural assets in decision making

Places for people

~~E.~~D. ~~All new d~~Development proposals ~~should~~ must put people at the centre of the design-led approach, ensuring buildings and spaces are welcoming, inclusive, safe and accessible to ~~all~~people of all backgrounds, ages and abilities. ~~Proposals should~~Development should be designed and built to a human scale by responding to the ways in which ~~demonstrate an understanding of how~~ people move through, engage with and experience their surroundings~~, and respond positively to this by delivering healthy, liveable and walkable neighbourhoods~~.

~~F.~~E. Development proposals ~~will be supported where they help to~~must be designed to facilitate good physical and mental health, ~~and contribute to~~ support the wellbeing of the population and foster community cohesion by providing:~~.~~

~~G. To support health and wellbeing of the population, and to create inclusive environments that help to foster community cohesion, new development must be designed to ensure:~~

a. Buildings and spaces that are inclusive, intuitive to use, comfortable, safe and secure;

~~a.~~b. A high quality public realm that maintains and wherever possible enhances access to green and open spaces;

~~b. Delivery of a high quality and effectively managed public realm that both encourages and enables convenient movement by walking and cycling, including by:~~

~~i. Responding to people's movement patterns and desire lines in an area,~~

~~ii. Integrating wide pavements and/or widening pavements where these already exist;~~

~~iii. Making provision for cycle parking infrastructure and bus stops within the public realm; and~~

~~iv. Reducing vehicular dominance and speeds.~~

c. Positive and active frontages that generate visual interest and which have a positive ~~interface well~~ relationship with the public realm, particularly at the street-level;

d. ~~Provision of~~ W~~w~~ell-integrated, dedicated space and equipment for relaxation, social interaction and physical activity, including where appropriate space for play and informal recreation; and

e. A high standard of amenity ~~is provided, with development that prevents and/or mitigates impacts of noise, vibration, poor air quality and addresses other environmental impacts, such as daylight and sunlight~~.

Well-functioning and resilient places

~~H.~~F. ~~The form and layout of development should be designed to~~ Development proposals must be well-integrated within their neighbourhood. They must provide ~~secure~~ a positive and coherent ~~and appropriate functional~~ relationship with all land uses ~~and~~ spaces within the site and its surroundings~~, also taking into account the~~

Commented [NE56]: Respond to consultation – request for 'human scale' be a design criteria

Commented [NE57]: Incorporated in E above

Commented [NE58]: These policy criteria have been moved to QD3 Public Realm.

Commented [NE59]: Repetition – addressed by Amenity and Agent of Change policy

~~needs of the users of the development. Proposals should~~ havinge ~~particular~~ regard to:

~~a. The integration of the development within the site and the wider locality, particularly to secure a positive relationship with neighbouring properties and land uses;~~

a. The compatibility of land-uses and activities within and surrounding the development;

b. The need to ensure that ~~sites and~~ neighbourhoods are ~~legible and~~ well-connected~~,~~ both ~~and for development to encourage~~by encouraging and enabling~~.~~ movement by walking, cycling and the use of public transport; and

c. The efficient servicing and effective management of buildings and the public realm, including for delivery and servicing vehicles.

~~I.~~G. ~~In order to contribute to well-functioning neighbourhoods and places, new~~ Dd~~e~~velopment must be appropriately supported by infrastructure ~~(including transport, community and green infrastructure)~~. Development p~~P~~roposals will be expected to consider, and be linked to, the provision of future planned levels of infrastructure along with the timing of the delivery of this infrastructure. Where there is insufficient capacity of existing infrastructure to support a development proposal, applicants will be required to work with infrastructure providers to ensure sufficient capacity will exist at the appropriate time, including through the phasing of development.

~~J.~~H. Development proposals must be designed to ~~assist in~~ mitigat~~e~~ing climate change and ~~also~~ integrate adaptation measures to make neighbourhoods and properties more resilient to its impacts, including by maximising opportunities for urban greening, ~~through adaption measures~~ with reference to other Local Plan policies. ~~Proposals should be designed and constructed to deliver net gains in biodiversity and achieve high sustainability standards, including by seeking to maximise opportunities for urban greening, having regard to the Local Plan Sections 10 (Green infrastructure) and 11 (Sustainable design and infrastructure).~~

Delivering high quality development

~~K.~~I. Development proposals must ~~submit~~ include a Design and Access Statement to demonstrate how ~~they have followed~~ the design-led approach has been applied to deliver high quality development ~~in accordance with (A-J) above~~.

~~L.~~J. Development proposals will be expected to have regard to and address:

a. Supplementary Planning Documents and Guidance published by the Council and the Mayor of London respectively, along with other good practice guidance;

b. Feedback from the Council including through its Pre-application Advice Service and where appropriate, Lewisham's independent Design Review Panel.

~~M.~~K. Applicants should work closely with local communities and others likely to be affected by new development to understand the local and distinctive context of the site, as well as to consider design options that respond positively to this context.

Commented [NE60]: Amended for clarity and to aid policy implementation

Commented [NE61]: Respond to public consultation – design to not only enable but 'encourage' sustainable modes of transport

Commented [NE62]: Repetition - covered elsewhere in plan

Development proposals that can demonstrate early, proactive, inclusive and effective engagement with the local community and other key stakeholders will be considered more favourably than those that cannot.

Explanation

5.1. ~~The Local Plan sets out an ambitious framework to facilitate and coordinate significant new investment in the Borough, as well as to deliver Good Growth that benefits our neighbourhoods and communities of people.~~ To realise the Vision for Lewisham and ~~and achieve~~ address the Local ~~p~~Plan's strategic objectives, ~~,~~ it is imperative that all new development ~~delivered~~ is ~~high~~ designed, built and managed to a high quality ~~development~~standard. ~~This policy advocates that a design-led approach is used to in order to ensure that development successfully responds to its local context.~~ using the design-led approach. ~~The need for this approach is a common thread that runs throughout the remainder of the Local Plan policies.~~

5.2. ~~All proposals must clearly demonstrate that t~~The design-led approach ~~has been used to inform the development. This~~ 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 ~~positively~~ 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 ~~that proposals address the need for~~ development to function effectively~~,~~ both on its own and in relation to the buildings and spaces around it. ~~Regardless of the nature or scale of development, all proposals must use this approach to ensure beneficial outcomes for Lewisham's people and places, as well as the natural environment and wider global climate.~~

5.3. The design-led approach must begin with an understanding of the development site's local context. This ~~context~~ includes the distinctive character of the site ~~along with~~and its wider setting~~, including the neighbourhood within which it is situated~~. The Lewisham Characterisation Study (2019) has ~~been prepared to help~~ informed the preparation of the Local Plan and ~~to~~ will support its implementation. It should be referred to as a useful starting point for ~~considering~~ development proposals~~, and will assist in~~as it ~~providing~~ provides insight into the key features of the Borough's historical, built and natural environment. This is only one point of reference, however, and proposals will be expected to demonstrate a comprehensive understanding of the site context and clearly articulate how the development has been designed to respond positively to this ~~in a positive way~~. ~~Part 3 of the Local Plan sets out strategic priorities and policies for the Lewisham's character areas. It has been prepared to help guide development and ensure it is fundamentally place-responsive, by being designed to address and enhance the distinctive qualities of Lewisham's neighbourhoods and the diversity of local communities.~~ This includes consideration of the evolving character of an area and opportunities to carefully manage change in a way that supports Good Growth. Development proposals should therefore address their relationship to the spatial strategy, site allocations

Commented [NE63]: The policy supporting text has been amended throughout to make more concise

Commented [NE64]: Respond to consultation – recognise that local character can evolve over time, and that development should respond to this

and where relevant, development which has been consented but not yet unimplemented.

5.4. The successful delivery of the spatial strategy will require that ~~proposals~~ new developments optimise the capacity of sites. There is a need to accommodate a significant amount of growth within the Borough over the plan period, which must be~~. This growth needs to be~~ carefully managed ~~in order to ensure the delivery of inclusive, healthy and liveable neighbourhoods that are well supported by infrastructure~~. The design-led approach is integral to ensuring that the optimal capacity of development sites is realised~~are developed to an optimum capacity that is responsive to the site's context and the supporting infrastructure available or planned to be delivered~~. Further details are set out in Policy QD6 (Optimising site capacity).

Delivering high quality development

5.5. We will publish a package of ~~supplementary~~ planning ~~documents and other~~ guidance to support implementation of the Local Plan, and to ensure clarity in our expectations for new development. ~~This includes planning guidance for key areas and strategic sites, management of the historic environment, specific design matters and planning obligations.~~ Key guidance documents are signposted throughout the Local Plan. ~~This~~ They ~~local guidance~~ should be read in conjunction with the suite of London Plan S~~s~~upplementary P~~p~~lanning G~~g~~uidance and other sources of good practice guidance, where appropriate, including the Government's National Design Guide and that published by Historic England. ~~Applicants are strongly advised to refer to the Council's planning website for the latest available information on Lewisham's adopted and emerging guidance. Proposals will be expected to have regard to and positively engage with these documents, which will be a material consideration in planning decisions.~~

Commented [NE65]: Respond to consultation – reference to National Design Guide should be included

~~5.6. We will work positively and proactively with development industry partners and other key stakeholder to secure the delivery of high quality design in Lewisham. Applicants are encouraged to engage with the Council at the early stages in the planning and design process. This will help to ensure that development proposals are appropriate for their location, respond positively to the local context and contribute to the delivery of the spatial strategy for the Borough. Through early engagement we will also endeavour to assist applicants with identifying potential funding opportunities available to boost the delivery of genuinely affordable housing on new development schemes, as set out in Policy HO3 (Genuinely affordable housing).~~

Commented [NE66]: Repetition - covered in Part 5 Delivery and Monitoring.

~~5.7.~~5.6. Pre-application meetings are a useful way to establish the land use principles for development sites, and to identify and discuss any key matters that need to be addressed within a particular scheme. This includes the consideration of routes to resolving planning issues or other potential conflicts prior to the formal submission of a planning application. Pre-application meetings are also useful information sharing exercises, and provide the Council with opportunities to support development industry partners in linking up with other corporate services and service areas. For instance, we can flag resources available to help with sourcing

local labour for construction projects, including apprenticeships, as well as funding opportunities to boost the delivery of genuinely affordable housing.

~~5.8.~~5.7. We are proud to support an independent Design Review Panel (DRP) in Lewisham as part of our positive approach to working with delivery partners. The DRP is formed of professional design experts who meet regularly to review schemes and provide feedback to applicants. While the panel does not have decision-making powers, it serves as an advisory body helping to achieve positive outcomes for the built environment and Lewisham's communities. Comments from the panel are fed into the assessment of pre-application schemes, planning applications and appeals. Proposals for major developments and other developments likely to have significant local impacts should be brought to the panel at the early stage in the planning process. Further information about the DRP is available on the Council's planning webpage.

~~5.9. Development proposals should be brought to the panel as early as possible within the design process in order to ensure a productive and beneficial outcome for all parties. By bringing a development to the panel early, design teams have an appropriate time to respond to panel advice and have a better chance to address design concerns prior to application – thus providing more assurances for the developer and helping to de-risk the planning application. The panel assists and encourages developers and their design teams to deliver high quality design in their proposals. It is expected that all major and significant development will be brought to the panel during the planning process.~~

~~5.10.~~5.8. Applicants should work closely with local communities and others likely to be affected by new development to understand the local and distinctive context of the site and its setting, as well as to consider design options that respond positively to this context. Community consensus and agreement on proposals is not in itself a reason for granting planning consent, as all proposals will need to demonstrate compliance with the Local Plan policies. However applicants working with the community through the design-led approach are more likely to arrive at development proposals that respond to the distinctive qualities of neighbourhoods and places, based on a more thorough understanding of the local context, and therefore support the delivery of the spatial strategy. Development proposals that can demonstrate early, proactive, inclusive and effective engagement with the local community and other key stakeholders will be considered more favourably than those that cannot.

QD 2 Inclusive and safe design

A. It is imperative that people of all backgrounds, ages and abilities are able to move with ease throughout Borough, and within buildings and spaces, ~~and~~ as well as to feel safe in their surroundings wherever they are. ~~All new~~ Dd~~e~~velopment proposals ~~will be required to~~must include an Inclusive Design Statement to demonstrate how they will contribute to delivering inclusive, accessible, safe and secure environments in Lewisham.

B. Development proposals must respond positively to the diversity and varied needs of Lewisham's population and promote social cohesion by:

Commented [NE67]: Addition to ensure point in deleted paragraph above is retained.

Commented [NE68]: Removed to make more concise – this information is set out on Council's webpage, and paragraph above has been amended to refer this

Commented [NE69]: Respond to consultation and Member feedback – stronger requirements to demonstrate inclusive design

a. Ensuring buildings and spaces are designed to be entered, used and exited safely, easily and with dignity for all;
b. Ensuring buildings and spaces are designed to be inclusive to all ~~and do not unnecessarily~~with no disabling barriers that inhibit, restrict or prevent convenient access and use, including by occupants of different tenure types;
c. Incorporating measures that allow for easy adaptation of buildings and spaces to help meet the different and changing needs of users over the lifetime of the development;
d. Delivering a high quality public realm, in line with Policy QD-3 (Public realm and connecting places); and
e. ~~Having regard to~~Applying 'Secured by Design' principles.

C. ~~Gated forms of development, particularly for new housing development, are not considered to support inclusive and safe design principles and will be strongly resisted. The use of~~Where development proposals incorporate perimeter or ~~gates~~external gates, the use of these must be justified for reasons of public health and safety. Where gates are considered by the Council to be acceptable in principle, ~~it will require~~ these ~~to~~ must be of a high quality design and sensitively integrated into the development. Planning contributions and/or legal agreements may be used to secure the appropriate management of gates, and to help ensure they do not unnecessarily restrict public access to buildings and spaces, including the public realm.

Accessible and inclusive housing

D. To help ensure that housing is designed to meet the ~~different~~ varied requirements of Lewisham's resident population development proposals ~~will be expected to~~ incorporating new residential units must ensure that:
a. At least 10 per cent of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings'; and
b. All other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

E. Development proposals for housing must be designed to maximise tenure integration and be 'tenure neutral', having regard to the National Design Guide or latest equivalent.

~~E.~~F. Where ~~housing~~ development proposals for housing include~~s~~ provision of communal private amenity space or facilities this should be ~~made available for~~designed and appropriately managed in a way that allows for access by all residents occupying the development, regardless of tenure.

Adapting historic buildings and other heritage assets

~~F.~~G. Where adaptations to an historic building or other heritage asset is proposed to make the building or space more inclusive and safe, development proposals will be supported where they preserve or enhance the significance of the asset and its setting.

Commented [NE70]: Respond to consultation and for consistency with London Plan language – unrestricted access may lead to public health and safety issues without appropriate management; policy amended to reflect this concern. Also picked up in revisions to Policies E and F below and supporting text para 5.17

Commented [NE71]: Amended for clarification and to aid policy implementation - restriction on gated development applies to all development not just housing

Commented [NE72]: Respond to consultation and Member feedback - to give effect to National Design Guide on tenure neutral housing.

Commented [NE73]: Respond to consultation – to address issues around feasibility of providing access to private communal spaces, and possible need for management arrangements

Explanation

~~5.11.~~5.9. The built environment influences the quality of life of everyone in Lewisham ~~whether they are living, working or visiting the Borough~~. The layout and design of buildings and spaces~~, including the public realm,~~ can significantly impact on people's ability to move with ease around the Borough and to live independent and dignified lives. Development proposals must therefore apply i~~I~~nclusive and safe design principles ~~should therefore be~~using ~~considered at the early stage in~~ the design-led approach~~, ensuring that people of all ages and abilities are able to benefit from high quality, accessible, safe and secure environments~~. This will need to be demonstrated through an Inclusive Design Statement, submitted as part of the Design and Access Statement.

~~5.12.~~5.10. Whilst inclusive design includes consideration of wheelchair users it is important to emphasise that it extends beyond this particular group. Inclusive design must consider the needs of the wider population and the different groups of people that are likely to access and use buildings and spaces, ~~and move through~~including the public realm. ~~We will expect proposals to demonstrate how they have considered and addressed inclusive design principles, taking into account the nature and location of development.~~

Commented [NE74]: Removed to make more concise – already stated in policy

~~5.13.~~5.11. Development proposals should take into account and respond positively to the diverse needs of Lewisham's population, including families and those in groups with protected characteristics.[55] Wherever possible buildings and spaces should be designed to be adaptable to the different and changing needs of users over the lifetime of development. This will help to avoid or offset costly alterations that may be required later on. Applicants are encouraged to refer the latest standing guidance on inclusive design, including British Standards documents BS8300-1:2018 (Design of an accessible and inclusive built environment. External environment. Code of Practice. January 2018) and BS8300-2:2028 (Design of an accessible and inclusive built environment. Buildings. Code of Practice. January 2018).

~~5.14.~~5.12. ~~We will strongly encourage the~~Development proposals should use ~~of~~ the latest standing guidance on 'Secured by Design'[56], or equivalent guidance, ~~principles~~ to help reduce crime and improve perceptions of safety. This includes measures to encourage passive surveillance, including through the integration of active frontages and layouts which allow for 'eyes on the street'. ~~and other interventions to promote street level activity~~. Developments should make p~~P~~rovision ~~of~~ for easily accessible, legible and appropriately illuminated access and entrance points ~~is also important consideration for all types of development~~, including the public realm. ~~Development proposals will be expected to demonstrate that they have engaged with the latest standing guidance on 'Secure by Design', or equivalent guidance.~~ By applying Secure by Design principles development proposals can help to create safer public spaces, particularly

Commented [NE75]: Repetition - stated in Policy above.

[55] Groups with protected characteristics are set out in the Equalities Act 2010.
[56] Secured by Design is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places.

children and young people[57] and other groups, such as women and girls[58], for whom the design of the built environment can have significant impacts on personal security and perceptions of safety.

Commented [NE76]: Respond to consultation – plan should include more emphasis on safety of particular groups, including women, children and young people

Accessible and inclusive housing

~~5.15.~~5.13. In line with the ~~draft~~ London Plan, ~~we will expect that all new~~ development proposals must contribute to ~~meets~~ the strategic target for provision of wheelchair user dwellings and ensuring accessible and adaptable dwellings, in accordance with Building Regulations M4(3) and M4(2) respectively, or equivalent standards which may supersede these. For the avoidance of doubt, this policy applies to dwellings that are created via works to which Part M volume 1 of the Building Regulations applies. To comply with the Building Regulation requirements appropriate step-free access into the dwelling will need to be provided. This policy helps to support our ~~strategic~~ approach to meeting housing needs for older people through adaptable housing~~, as set out in Policy HO5 (Accommodation for older people)~~

~~5.16.~~5.14. All housing development should meet the London Plan target for M4(2) dwellings. Major developments should also meet the M4(3) target on-site, whilst minor developments of less than 10 units will be required to provide sufficient justification if the target for 'wheelchair user' dwellings cannot be met. In considering the suitability of a site for wheelchair accessible and adaptable or user dwellings we will have regard to individual site circumstances. This is because flexibility may need to be applied to meet policy objectives (e.g. to enable the requirement to apply to 10~~%~~ per cent of habitable rooms where a better outcome is provided in terms of provision of larger units). Discretion may also be needed in exceptional circumstances when provision of a lift to dwelling entrances is not technically feasible, such as with some constrained infill sites or flats above shops. ~~We will seek to~~Planning conditions may be used to secure an appropriate amount of provision M4(2) and M4(3) standard dwellings ~~provision for individual developments, including through the use of planning conditions~~.

Commented [NE77]: Respond to consultation – to aid effective implementation of policy, clarification on how M4(3) target will be applied on different types of development

Commented [NE78]: Rephrased for clarity

5.15. ~~To support our objectives for delivering inclusive communities, A~~all development should be designed to promote social ~~interaction~~ integration, community cohesion and equality of access ~~to facilities and services~~. This includes inclusive, safe and welcoming access to buildings, particularly front entrances and amenity spaces. Proposals should avoid the use of separate main entrances and external or perimeter gates.

5.16. Development proposals for new housing must be designed to maximise tenure integration and be 'tenure neutral'. The National Design Guide (2021) defines tenure neutral as: "Housing where no group of residents is disadvantaged as a result of the tenure of their homes. There is no segregation or difference in quality between tenures by siting, accessibility, environmental conditions, external facade or materials. Homes of all tenures are represented in equally attractive and

[57] The Local Plan supports priorities of the Lewisham Children and Young People's Plan 2019-2022.
[58] There is a growing body of evidence linking urban design to women's safety and perceptions of safety. For example, research prepared and collated by the UN Women National Committee UK.

beneficial locations, and there is no differentiation in the positions of entrances. Shared open or play spaces are accessible to all residents around them, regardless of tenure". Development proposals will be assessed having regard to the National Design Guide, or latest equivalent. Applications should clearly set out details of their approach to tenure neutral housing in the Inclusive Design Statement.

Commented [NE79]: Additional supporting text to support new 'tenure neutral' policy criterion linked to National Design Guide.

5.17. Where private communal amenity space is provided in new housing development~~,~~ this must be designed and appropriately managed in a way ~~made accessible to~~that allows for access to all residents occupying the building. Details of access, management and building maintenance should be included with planning applications, normally in the form of Management Plans. These should clearly set out why any proposed measures to manage access are considered necessary in the interests of public health and safety. They should also address site specific issues, for example, where larger developments and sites contain many blocks or uses that are owned and/or managed by different parties, and where individual security and management requirements are needed. We will ~~strongly resist~~refuse proposals that unnecessarily restrict, inhibit or prevent access to buildings or communal amenity space, including for reasons of housing tenure.

Commented [NE80]: Respond to consultation – further clarifications around access to communal amenity spaces to aid policy implementation

Adapting historic buildings and other heritage assets

5.18. Non-standard approaches may be required when adapting historic buildings and other heritage assets, and current design standards should be considered flexibly alongside the particular heritage significance of a building or asset. We will work with applicants to help ensure that any alterations or changes proposed to make heritage assets safer and more inclusive do not harm their significance, in line with the NPPF and Local Plan policies in Section 6 (Heritage). Where historic buildings, spaces or other features are likely to be affected by development, careful consideration will need to be given to ensure that new design responds sensitively to its context, and does not adversely impact on those elements that contribute to the significance of the asset. Applicants are advised to consult relevant guidance on this matter for support, including the latest standing guidance published by Historic England.

QD 3 Public realm and connecting places

A. Development proposals must use the design-led approach to secure a high quality p~~P~~ublic realm. ~~must be designed and maintained to a high quality standard. It s~~hould ~~help to~~ They must respond positively to the role of the public realm in contributing to local distinctiveness and ~~ensure~~ supporting inclusive, safe, accessible, attractive and well-connected places and spaces ~~that make a positive contribution to the neighbourhoods in which they are located~~. ~~Development proposals are encouraged to create new public realm, or enhance existing public realm, wherever opportunities arise.~~

Commented [NE81]: Picked up in D below

~~B. Public realm should be delivered through the design-led approach, having regard to the principles in Policy QD1 (High quality design). In responding to these principles, development proposals must demonstrate an understanding of how the public realm functions both in its immediate and wider local context, and how this contributes to~~

~~local distinctiveness and creating a sense of place. Consideration should be given to the ways in which people use the public realm and how its design will influence their experiences within it.~~

~~C.~~B. Development proposals must respond positively to t~~T~~he movement and connective function of the public realm. They should be designed to enable and encourage movement by walking, cycling and the use of public transport, and also seek to reduce vehicular dominance and speeds. ~~must be addressed to~~Proposals must ensure that ~~development~~ the public realm provide~~s~~ for coherent relationships with surrounding buildings and land-uses, and good connections within and between ~~sites and~~ neighbourhoods. ~~, as well as public transport, and maximises opportunities for creating new connections. Public realm should be commensurate with the role and function of places and the highway network, and reflect the priority given to movement by walking, cycling and the use of public transport, in line Policy TR3 (Healthy streets as part of healthy neighbourhoods).~~

~~D.~~C. Development proposals must address legibility and permeability of the public realm, both within a site as well as its immediate and wider surroundings. ~~. This will require particular~~ taking account of~~attention to~~ the movement patterns and desire lines of people within~~, through and around the development~~ an area. Consideration should be given to the location of street crossings and other measures to promote safe access for all, such as way-finding markers and signage, external lighting, ramps, lifts, dedicated cycle lanes, bridges, underpasses and, where appropriate, railway arches.

~~E.~~D. Development proposals ~~will be expected to~~must investigate and maximise opportunities to enhance ~~the movement and connective function of~~ the public realm ~~by maximising opportunities to:~~. They should seek to:

a. Improve connections to existing or planned ~~strategic~~ transport and community infrastructure, including open space;

~~a.~~b. Make provision for cycle parking infrastructure and bus stops;

c. Enhance and where appropriate help to reinstate connections that make a positive contribution to the locality, including those that are of local importance and historic significance;

~~b.~~d. Integrate wider pavements, or widen pavements where these already exist; ~~and~~

e. Avoid or remove barriers that unnecessarily impede or restrict movement and accessibility, and adversely impact on public safety; and~~.~~

~~c.~~f. Integrate trees and other urban greening measures.

E. ~~Development proposals must demonstrate how the public realm will be well integrated with and positively relate to the spaces, buildings and land uses within the site and its surrounds.~~ Development proposals should be designed to establish or reinforce a clearly defined public realm that helps to support the function of different uses within an area and protects local amenity.

~~F.~~

Commented [NE82]: Repetition - covered in QD1

Commented [NE83]: Respond to consultation – design to not only enable but 'encourage' sustainable modes of transport

Commented [NE84]: Repetition - covered elsewhere in plan

Commented [NE85]: Respond to consultation – request that stronger emphasis on maximising opportunities to enhance

Commented [NE86]: Respond to consultation – request for specific facilities cited

Commented [NE87]: Respond to consultation – request for pavement widening to be included as a measure to support sustainable travel

Commented [NE88]: Respond to consultation – more emphasis on tree planting in public realm

Commented [NE89]: Repetition – covered elsewhere in policy

~~G.~~F. Development proposals should deliver a vibrant public realm that promotes opportunities for relaxation, social interaction and physical activity for people of all ages and abilities. ~~Proposals~~ They should seek to create welcoming environments that attract people into public spaces and encourage their enjoyment within them during different times of the day and night, and throughout the year. This includes consideration of how the local microclimatic impacts on people's health and comfort. ~~Where appropriate, proposals should~~ Development proposals must make provision for public realm that is appropriate to the uses(s) involved along with the location, nature and scale of development, including consideration for:

a. Public conveniences, including toilets and changing facilities, particularly for families with children and those with specialist needs;
b. Free drinking water fountains;
c. Sensitively integrated lighting;
d. Shading and shelter to protect and provide comfort from direct sunlight, rain and wind;
e. Public art;
f. Benches and other types of seating;
g. Formal and informal play space, addressing the needs of people of different ages and abilities;
h. Adaptable space to support events and activities (such as markets, civic and cultural events) and infrastructure to support these, such as connections to power and water.

~~H.~~G. Public realm should be sustainability designed and constructed, including by maximising opportunities for urban greening and mitigating the impacts of climate change, ~~having regard~~with reference to other Local Plan policies. ~~Sections 10 (Green infrastructure) and 11 (Sustainable design and infrastructure).~~ Priority should be given to the use of high quality and durable materials, with permeable or semi-permeable surfaces integrated wherever possible.

Public art

~~I.~~H. Development proposals, particularly for major development, should investigate opportunities to integrate public art to enhance the legibility of the public realm, enhance the distinctiveness of buildings and spaces, and to help to foster a sense of place. The use of local artists for public art commissions is strongly encouraged.

~~J.~~I. Public art, including installations, proposed to be integrated as part of a development, or within the public realm, should be appropriately located in a prominent position and be sensitively sited and/or fixed to a building in a manner that:

a. Responds positively to the site context and local character, including historic character and the significance of heritage assets;
b. Enhances the legibility of the public realm; and
c. Does not adversely impact on amenity.

~~K.~~J. Where public art is proposed to be provided, the location, siting and general design of the art, along with long-term management and maintenance arrangements, must be agreed by the Council prior to its installation.

Commented [NE90]: Amended to support inclusive design principles

Effectively managing the public realm

~~L.~~K. Development proposals ~~will be expected to~~must ensure that appropriate management and maintenance arrangements are in place for the public realm. Where provision is made for privately owned public space this should be ~~operated~~ managed in the same manner as public space, ensuring the space is inclusive and ~~equality of~~ access ~~for all~~is not unreasonably restricted. Management Plans will be required for Major development and other proposals with significant elements of public realm. Planning contributions and/or legal agreements may be used to secure the appropriate management of the public realm.

Explanation

5.19. Public realm consists of all the publicly accessible space between buildings, whether public or privately owned. This includes elements of the transport network (such as pavements, streets and cycleways), amenity spaces (such as station forecourts, squares, play areas and open spaces) and internal spaces in buildings open to and frequented by the public (such as station concourses, shopping malls, markets and cultural facilities).

5.20. Public realm performs a key role in shaping the character of Lewisham's neighbourhoods and influencing the function of the buildings and spaces within them. It also factors significantly in the population's physical and mental health and wellbeing, and quality of life. This is because the public realm affects how people experience the Borough through their movements and daily activities. It also impacts on the opportunities available to people of all ages and abilities to lead healthy and active lifestyles.

5.21. It is important that the different elements of the public realm are not considered in isolation of each other or the people and places they support. Rather the public realm should be seen in a holistic way, as a series of connected routes and spaces that together help to form the urban and social fabric of the Borough. The public realm links Lewisham's places and neighbourhoods with one another, enabling people to access homes, jobs, community facilities, services and leisure and recreational opportunities, whether within the Borough or elsewhere.

5.22. ~~Public realm must be considered at the early stage of the design-led approach. This will help to ensure that all people are able to move easily and conveniently without impediments, and that they benefit from access to safe and secure, attractive and healthy environments.~~ The design of development should be informed by an understanding of how people currently use, or will be expected to use, the public realm. Placing people at the heart of the design process ~~is more likely to result in positive outcomes, particularly in terms achieving~~will help to secure inclusive and well-functioning spaces and places. Development should be designed and built to the human scale, for example, by integrating generous public realm treatments, building set-backs and articulations, active ground floor frontages and greening measures.

Commented [NE91]: Respond to consultation – recognition that some restrictions may need to be put in place for reasons of public health and safety

Commented [NE92]: Policy supporting text amended throughout to make more concise and reduce repetition of points covered elsewhere in plan

Commented [NE93]: Respond to consultation – request for design for 'human scale' to be covered in plan, as per QD1 amendment

5.23. In addressing the public realm, development proposals should prioritise the movement of people by ~~active travel modes (such as~~ walking, ~~and~~ cycling~~)~~ and the use of public transport, in line with the Healthy Streets A~~a~~pproach. This policy should therefore be read in conjunction with Policy TR3 (Healthy streets as part of healthy neighbourhoods)~~, which sets out further details in this respect. New and enhanced public realm will help to support Local Plan objectives to facilitate a significant shift in travel away from cars to more sustainable transport modes. Opportunities should be explored to improve connections to existing and planned strategic infrastructure, particularly cycle routes and stations, as well as community facilities.~~ Development proposals are also encouraged to refer to the Government's Manual for Streets guidance.[59]

5.24. Public realm should be designed to reflect, reinforce and enhance the distinctive features of Lewisham's neighbourhoods that contribute to shaping local character and identity. Development should help to create welcoming, attractive, vibrant and healthy places where people have ample opportunity to relax, socialise and enjoy leisure pursuits at different times of the day, evening and night time and throughout the year. This is especially important within and around Lewisham's town centres, which are key focal points for civic and public life. ~~There are wide range of facilities that can be integrated into development to make the public realm more inclusive, inviting and comfortable. This includes free-to-use public conveniences, seating and play space.~~

5.25. Where appropriate, opportunities should be taken to make provision for adaptable space to support different types of activities, such as markets, and cultural and civic events. This is particularly for major development proposals or other developments incorporating or located adjacent to larger public open spaces, such as squares and station forecourts. Development should include, or be designed to enable connections to infrastructure to support these activities, such as electrical outlets and water.

5.26. All public realm should be designed to achieve high sustainability standards, with reference to other Local Plan policies. ~~The Local Plan sets out policies and guidance to help ensure that proposals address environmental considerations through the design, construction and operation stages of development. This includes policies in Section 10 (Green infrastructure) and Section 11 (Sustainable design and infrastructure). In particular, development proposals should maximise~~There are significant opportunities to incorporate urban greening and sustainable drainage measures within the public realm, which development proposals will be required to investigate and maximise. ~~This will help to ensure a positive response to climate change resilience, and also enhance the amenity value of the public realm.~~

5.27. Without proper management the public realm can deteriorate over time, compromising its function~~al~~ and amenity value ~~and diminishing the important contribution it makes to sustainable neighbourhoods. In delivering high quality public realm,~~Development ~~proposals~~ should be designed to prevent against the

[59] The Department for Transport is updating its 'Manual for Streets' guidance and this will supersede the Manual for Streets (2007) and Manual for Streets 2 (2010).

need for excessive site management requirements~~, where appropriate~~. For example, ~~opportunities should be taken to~~the use of~~e~~ durable materials, ~~select~~ drought tolerant, perennial species for tree planting and other greening measures~~,~~ ~~and create naturalised landscaping. These interventions may also~~can provide a cost-efficient way to maintain ~~a high quality~~ public realm over the ~~lifetime of the development~~long-term.

5.28. It is imperative that the public realm supports inclusive neighbourhoods and communities. ~~Private ownership and management of the public realm is not in itself a cause of poor mobility, exclusion and segregation.~~ We will ~~seek to avoid~~refuse development proposals that seek to place inappropriate controls on the public realm, such as for public access and use. ~~to ensure it is genuinely and publicly accessible for all local residents and visitors to the Borough, whilst~~ It is ~~recognising~~ recognised there may be a need for reasonable measures to address liability, ~~and~~ public health and safety~~,~~ which will be considered on a case-by-case basis. ~~The Council will work with developers to ensure that public realm is positively managed so that the standards of public access and use are maintained over the lifetime of the development, including through the use of planning conditions and obligations.~~

Commented [NE94]: Amended to make more definitive and to aid policy implementation

QD 4 Building heights

Commented [NE95]: Respond to consultation – policy amended throughout to ensure conformity with London Plan and provide clarity on expectations for building heights, Changes informed by Tall Buildings Study Addendum (2022).

~~A. Development proposals must demonstrate that the design-led approach has been used to ensure that~~ The building height~~s~~ of development must respond positively to the distinctive character of Lewisham's neighbourhoods. Building heights should be ~~and are~~ appropriate in scale, taking account of the character of a site's immediate ~~and~~ wider context and the requirement to deliver high quality design in line with ~~, with reference to~~ Policy QD1 (High quality design). ~~Proposals for tall and taller buildings must exhibit a clear design rationale.~~

~~Taller buildings~~

~~B. Proposals for T~~taller buildings ~~that are~~ buildings that are not tall buildings by definition (see QD4.C below) ~~and which~~ project above the height of adjoining properties and/or the prevailing height of buildings and structures in the~~ir~~ immediate and surrounding area~~,~~ will only be supported where they: ~~Development proposals for taller buildings will only be supported where they:~~

~~a. Are of an exceptionally good design and architectural quality;~~

~~b. Are sensitive to the site's context, ensuring that development does~~ Do ~~not excessively project above the streetscape and townscape (including the streetscape) or and do not result in an unacceptable adversely impact on the visual amenity of provided by it;~~

Commented [NE96]: Repetition – this is captured in Policy QD1 and also incorporated in A above

~~c. Protect~~ Do not adversely impact on strategic and local views, vistas and ~~landmarks, including strategic background views, having regard to Policy QD5 (View management);~~

Commented [NE97]: Removed to make more concise.

~~d. Preserve or enhance the significance of heritage assets and their setting; and~~

e. Will not result in an adverse impact on the local amenity of neighbouring properties, whether individually or cumulatively with other development.

C. Where the prevailing height of buildings and structures adjoining a site, as well as its immediate and surrounding area, is expected to evolve in accordance with the spatial strategy for the Borough and/or consented development(s), proposals for taller buildings will be considered having regard to the emerging context and criteria QD4.B(c) QD4.B(f) above.

Tall buildings

D. Within Lewisham tall buildings are defined as buildings that cause a significant change to the skyline and which:

a. Are 30 metres or more in height, except in the designated Thames Policy Area where they are buildings 25 metres or more in height; or

b. Are significantly taller than the prevailing height of buildings in the immediate and surrounding area.

A. Tall buildings are substantially taller than their surroundings and cause a significant change to the skyline. Tall buildings will only be considered acceptable in principle in the locations identified in Figure 5.1 as being appropriate for tall buildings. Within Lewisham Tall Buildings are defined as buildings which are 10 storeys or 32.8 meters measured from the ground level to the top of the building (including any rooftop equipment), or greater. Development proposals for tall buildings will be assessed against and must comply with London Plan policy D9 (Tall buildings) and the following:.

B. Tall buildings should only be developed in locations identified as appropriate for tall buildings on the Policies Map (i.e. Tall Building Suitability Zones). Development proposals for tall buildings outside of these zones will be resisted.

C. Within those locations identified as appropriate for tall buildings, the maximum height of buildings shall not normally be more than:

a. 80.8 meters (25 storeys) to 151.2 meters (48 storeys) in North Deptford
b. 52.0 meters (16 storeys) to 112.8 meters (35 storeys) in Lewisham Town Centre
c. 39.2 meters (12 storeys) to 64.8 meters (20 storeys) in Catford
d. 64.8 meters (20 storeys) to 96.8 meters (30 storeys) in Deptford Creekside
e. 32.8 meters (10 storeys to 48.8 meters (15 storeys) in New Cross and New Cross Gate
f. 32.8 meters (10 storeys) to 39.2 meters (12 storeys) in Bellingham and Lee Green
g. 39.2 meters (12 storeys) to 52.0 meters (16 storeys) in Lower Sydenham / Bell Green proposed opportunity area

Commented [NE98]: Respond to consultation – amenity considerations should not just be neighbouring properties. This point has also been addressed in the amended Policy QD7 Amenity and agent of change, which needs to be read together with this policy.

Commented [NE99]: This point has been captured in the amended QD1 – covering all developments. Deleted here to avoid repetition. The London Plan requires that development proposals / planning decisions respond to both existing and emerging site context, recognising that character of areas can evolve over time. This is now reflected in the Local Plan.

Commented [NE100]: This definition was the London Plan 2016 definition. The London Plan 2021 requires local plans to set definitions of tall buildings. This is set out in C below, informed by Tall Buildings Study and Addendum.

Refer to figures 5.3 to ~~5.11~~5.10 for further details

~~E.~~D. ~~Where appropriately located in line with (D) above~~, Development proposals for tall buildings will ~~be required to~~only be permitted where they are in a Tall Building Suitability Zone, align with the appropriate height ranges set out above and it is demonstrated that the development:

a. Will c~~C~~ontribute~~s~~ to delivery of, and is not at odds with, the spatial strategy for the Borough;
b. Is of an exceptionally good design and architectural quality;
c. Is ~~designed with building heights that are~~ sensitive to the site's immediate and wider context ~~having regard~~with reference to Figure 5.2 (Tall Building Sensitivity Plan), including the distinctiveness of Thames Policy Area~~,~~ in line with Policy LNA4 (Thames Policy Area and Deptford Creekside);
d. Will not result in any unacceptable adverse visual, functional, environmental and cumulative impacts, ~~having regard~~with reference to the requirements of ~~draft~~ London Plan ~~P~~policy D~~8~~9 (Tall Buildings);
e. Will m~~M~~ake~~s~~ a positive contribution to the townscape and skyline;
f. Will not adversely impact on~~Protects~~ strategic and local views, vistas and landmarks, including strategic background views, ~~having regard~~with reference to Policy QD5 (View management); ~~and~~
g. Will preserve or enhance the significance of heritage assets and their setting; and
~~g.~~h. Provides a high quality public realm in line with Policy QD3 (Public realm and connecting places). Where appropriate, development will be required to make provision for free to enter, publicly-accessible areas that are incorporated into the building.

E. Development proposals for tall buildings should incorporate sensitively designed measures to ensure public safety at height such as barriers, rails and anti-climb equipment. These must be considered as part of the overall design-led approach and contribute positively to the skyline.

F. Tall buildings must be delivered through a masterplan process in order to ensure that they are appropriately located, ~~both within a site and wider locality,~~ designed to a high quality standard and effectively managed over the lifetime of the development. The requirements for masterplans are set out in Policy DM4 (Masterplans and comprehensive development).

Table 5.1~~7.1~~ Tall buildings – definition and maximum height by Tall Building Suitability Zone[60]

[60] Where building height figures are provided in metres, this is defined as metres measured from ground to the top of the building including any rooftop equipment.

Commented [NE101]: Repetition - deleted

Commented [NE102]: Deleted to aid effective implementation – building heights are not the only consideration on site sensitivity; this will ensure wider scope for consideration of impacts

Commented [NE103]: Respond to consultation – amended to aid policy implementation

Commented [NE104]: Respond to consultation – to ensure heritage is appropriately considered for tall buildings proposals

Commented [NE105]: Respond to consultation – request for measures for public safety, including to prevent falls

Commented [NE106]: Repetition – captured in policies above

Commented [NE107]: Respond to consultation – request for further details on what is required by the masterplan

Explanation

~~5.29. This policy sets out our approach to positively managing the development of tall and taller buildings in the Borough. Taller buildings are those that project above the prevailing heights of buildings and structures within a site's immediate and surrounding area (normally, but not exclusively, 2 to 3 storeys above). Tall buildings are defined as buildings that are 30 metres or more in height in Lewisham, except in the designated Thames Policy Area where they are defined as buildings 25 metres or more in height. Tall buildings also cause a significant change to the skyline. By definition, and for policy implementation, taller buildings are not tall buildings.~~

Commented [NE108]: Deleted – the definitions have been updated in the policy

~~5.30.~~5.29. ~~In order to facilitate the~~ In order to deliver ~~y of~~ the spatial strategy ~~for the Borough we will seek to ensure that the~~ and meet local needs, such as for new housing, workspace and community facilities, it is imperative that development ~~of sites is~~proposals optimise~~d when opportunities arise~~ the capacity of sites. ~~This includes support for~~ W~~w~~ell-designed and sensitively integrated, higher density development that responds positively to its local context can support Good Growth. ~~It is important to emphasise that higher density does not imply that tall buildings are necessary.~~ Higher density development can be ~~delivered~~ achieved through a wide range of site layouts and building ~~typologies~~forms and does not necessarily require tall or taller buildings. ~~typologies, including mid-rise developments that are reminiscent of historic mansion blocks but with modern specifications.~~

~~5.31. However it is recognised that tall and taller buildings can support strategic objectives for optimising the use and capacity of land, particularly to deliver wider public benefits. This includes provision of new housing to meet local needs, including genuinely affordable housing, along with employment floorspace, community facilities and public realm enhancements. Exceptionally designed and appropriately located tall and taller buildings with higher densities can have a role to play in delivering good growth. Whilst acknowledging that London's skyline has and will continue to evolve over time, there remains an imperative to protect and enhance the distinctiveness and character of Lewisham's neighbourhoods.~~

Commented [NE109]: Deleted to make more concise – points captured in revised paragraphs 5.29 and 5.31

~~5.32.~~5.30. ~~Irrespective of their extent and scale,~~ T~~t~~all and taller buildings are prominent ~~visual~~ features that can have significant impacts on the London skyline, the character of townscapes and local neighbourhoods as well as the amenity of ~~residents, visitors~~the population and ~~the~~ natural environment. ~~Where b~~Buildings that are appropriately ~~sited~~ located and well-designed~~, they~~ can help people to navigate through the Borough by providing reference points for wayfinding and emphasising the hierarchy of places ~~(including by creating or reinforcing wayfinding markers to nodes of cultural or civic activity and transport interchanges)~~. However where tall and taller buildings are inappropriately located and poorly ~~sited and~~ designed ~~tall and taller buildings~~they can have detrimental impacts ~~both on the immediate area and wider area~~. These impacts may include ~~the blocking of~~disruption to established views and vistas or landmarks, harm to heritage assets and their setting, disturbance to the character and visual amenity

of streetscapes and townscapes, and the introduction of ~~adverse~~ microclimate conditions such as wind tunnels. Poorly designed buildings can also adversely impact on community safety as well as the mental and physical health and wellbeing of the population.

Figure 5.1: Tall building~~s~~ S~~s~~uitability ~~plan~~Zones

~~5.33. All proposals for tall and taller buildings must have a clear urban design rationale and should be of an exceptional design and architectural quality. They should also be located and sited in a manner that ensures that development will positively contribute to local character and high quality living environments. This policy should be read in conjunction with other Local Plan policies, including Policy QD1 (High quality design), which set the requirements for delivering high quality, design-led development across the Borough.~~

~~5.34.~~5.31. Development p~~P~~roposals for taller buildings ~~assessed against Policies QD4 (A) and (B)~~ must demonstrate a clear understanding of, and respond positively to, the site context~~,~~ including heritage assets, their setting and the historical pattern of development ~~in a locality~~. The reference point for the prevailing height of buildings ~~or structures~~ will vary on a case-by-case basis, even within a neighbourhood ~~or locality~~. Not all existing tall or taller buildings will be appropriate references for new development. For example, some tower blocks built in the 1960s and 1970s detract from the historic~~al~~ character and townscape features within a neighbourhood~~,~~ and ~~are today considered not to make a positive contribution to local character~~are therefore not suitable reference points. ~~Furthermore, T~~the cumulative impact of tall or taller buildings within a site or locality will also be an important consideration. Applicants are ~~strongly~~ encouraged to refer the Lewisham Characterisation Study (2019) and where relevant~~,~~ Conservation Area Appraisals, ~~and relevant~~ Supplementary Planning Documents and Area Frameworks to develop an understanding of the site context ~~and development opportunities~~. Design and Access S~~s~~tatements should clearly set out what features of the built and natural environment have been used as reference points to inform the development design and building height~~s of proposals, as part of the contextual analysis~~.

~~5.35.~~5.32. There may be locations where the prevailing heights of buildings ~~adjoining a site and in its immediate and surrounding area may be~~are expected to evolve over time. For instance, there are areas within Lewisham where the ~~Local Plan, through the~~ spatial strategy~~,~~ provides in-principle support for the sensitive intensification of ~~sites and areas~~ neighbourhoods, including through the comprehensive redevelopment of sites. This includes ~~(such as along identified strategic~~Growth C~~c~~orridors, ~~or within~~ Opportunity Areas, Growth Nodes and Regeneration Nodes~~major town centres) or seeks to optimise the use of land through comprehensive redevelopment of strategic sites (i.e. site allocations)~~. Furthermore, there may be consented ~~schemes~~ developments ~~which~~ that establish new land use and design principles and which will influence the existing character of a site or area~~,~~ once implemented. ~~We will seek that proposals for taller buildings appropriately respond to the emerging context of a site and its~~

Commented [NE110]: Repetition – covered in policy and elsewhere in plan.

Commented [NE111]: Respond to consultation – more emphasis on heritage assets

Commented [NE112]: Deleted, for clarify – site allocations are consistent with the spatial strategy

~~wider setting, taking into account the need for new development to be sensitive to its context whilst supporting the delivery of the spatial strategy.~~

Figure 5.2: Tall buildings sensitivity plan

5.33. ~~Careful consideration will need to be taken with proposals for tall buildings given their visual prominence and range of potential impacts on the skyline, local neighbourhood and wider area.~~The London Plan provides that tall buildings will play a role in supporting Good Growth across London. It directs the Local Plan to identify locations where tall buildings may be an appropriate form of development and to set a local definition for tall buildings, recognising that this may vary in different areas of the Borough.[61] This policy helps give effect to the London Plan. The Policies Map designates Suitability Zones for tall buildings (also shown in Figure 5.1 ~~and Part 5 – Appendix 12~~, Tables 5.3-5.10 and Table 21.12). This must be read together with Table 7.1 which provides a definition of a tall building for each Suitability Zone along with recommended maximum building heights. The zones and threshold heights have been informed by the Lewisham Characterisation Study (2019), ~~and~~ Lewisham Tall Buildings Study (2020) and Tall Buildings Study Addendum (2022). ~~include detailed assessments of local character and have informed the identification of locations considered suitable for tall buildings and those with particular sensitivies, as set out in Figures 5.1 and 5.2 respectively. However, this in principle support does not mean that all proposals for tall buildings will be acceptable in these areas of the Borough.~~ Whilst Suitability Zones have been identified this does not mean that tall buildings are automatically acceptable within them or that the maximum building heights are appropriate in every instance. Although maximum heights are provided for each for the Tall Building Suitability Zones, proposals will still be expected to include robust design justifications for the heights proposed, including testing in key views.

~~5.36.~~5.34. Development p~~P~~roposals will be considered on ~~their own merits,~~a case-by-case basis taking into account their impacts on an individual site level ~~circumstances~~ and ~~the~~ cumulatively ~~impacts of the development of~~ in combination with other existing, consented and planned tall and taller buildings. ~~in a locality~~ Impacts include those in the building's immediate vicinity, surrounding area and elsewhere in London. Development proposals should refer the Tall Building Sensitivity Plan (Figure 5.2) early in the design-led approach to understand site-specific sensitivities and development constraints. ~~We may seek to assess the individual and cumulative impact of proposals~~The Council will normally employ the use of ~~using~~ graphic 3D modelling to assess development proposals, such as enabled by VU.CITY software, and applicants will be required to submit technical information to support this analysis.

~~5.37.~~5.35. Development proposals for tall buildings will be assessed in accordance with~~Draft~~ London Plan p~~P~~olicy D~~9~~8 (Tall buildings). ~~sets out detailed requirements and criteria against which tall building proposals will be assessed in Lewisham. This includes consideration of the visual, functional, environmental and cumulative impacts of development. Through the design-led approach all proposals for tall~~

[61] London Plan (2021) policy D9 (Tall buildings) provides that tall buildings should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.

Commented [NE113]: Repetition – covered in the policy

Commented [NE114]: Respond to consultation – recognition impact tall buildings can have outside the borough, for example character/amenity in neighbouring boroughs, in the Thames-side area, pan London views, etc.

buildings will need toProposals must provide include a sufficient level of information to demonstrate that potential impacts have been suitably identified and adequately addressed. Development pProposals will be strongly resistedrefused where they would will result in an unacceptable visual, functional, environmental and/or cumulative impacts that cannot be avoided or appropriately mitigated. 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.

5.38.5.36. The Maritime Greenwich World Heritage Site, of Maritime Greenwich Thames Policy Area and London View Management Framework views areis an important considerations for tall and taller buildings. There are riverside locations within the Borough that have been identified as being potentially sensitive to tall buildings.[62] The Maritime Greenwich World Heritage Site Buffer Zone is considered inappropriate for tall buildings. Tall buildings can also adversely impact on biodiversity and developments should therefore be appropriately sited and designed to avoid shading or casting light spill on Sites of Importance for Nature Conservation.

5.39.5.37. In addition, proposals for tall buildings will need to be accompanied by a site wide masterplan. This will help to ensure a rigorous design led approach is applied and that the development is effectively managed over its lifetime. Where appropriate, the site-wide masterplan will need to refer and positively other area-wide masterplans.

Figure 5.3: London strategic views and Lewisham local views

QD 5 View management

A. Strategic views include significant buildings, urban landscapes and riverscapes. There are a number 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 the Borough's local distinctiveness. These strategic views, including their Protected Vistas, will be designated and positively managed positively in line with the London Plan and its associated London View Management Framework.

B. Local Landmarks within the Borough are strategically important to Lewisham's distinctiveness. Designated Local Landmarks, along with the vistas towards these, will be positively managed positively.

C. Development proposals must not harm and, wherever possible, seek to make a positive contribution to the characteristics and composition of London Strategic Views and Lewisham Local Views, including their protected vistas and landmarks elements. Development proposals should also seek to preserve or where possible enhance a

[62] Important Views and Tall Buildings: Maritime Greenwich, A World Heritage Site. Greenwich World Heritage Site Coordinator. 2006.

Commented [NE115]: Respond to consultation – removed for clarity

Commented [NE116]: Respond to consultation – additional considerations for biodiversity to support policy implementation

Commented [NE117]: Repetition – covered in policy. Further details on Masterplans set out in Part 4, which will need to be read together with this policy.

Commented [NE118]: Respond to consultation - this policy will be subject to further review and potential revisions, which are pending outcomes of the Tall Buildings Study updates. Also, there is a need to consider local views suggested by the public as part of the consultation.

viewers' ability to recognise and appreciate the landmark elements within these views.

D. Development proposals affecting London Strategic Views, Lewisham Local Views and Local Landmarks will be assessed having regard to their contribution to preserving and enhancing local distinctiveness and:
   a. The need to ensure there is no detrimental impact on the foreground, middle ground and background of the designated view; and
   b. Compliance with the principles and policies for managing views~~, as~~ set out in ~~draft~~ London Plan Polic~~y~~ies HC3 (Strategic and Local Views) and HC4 (London View Management Framework).

E. Development proposals should use ~~T~~the design-led approach ~~should be used~~ to explore opportunities to enhance public access to viewing locations within the Borough~~,~~ and to create new local views and vistas, particularly where the comprehensive redevelopment of sites is proposed.

Explanation

~~5.40.~~5.38. There are a number of views that make an important strategic contribution to the distinctiveness and character of Lewisham and London. These views help to define the form of the city. They also help to shape people's sense of place, particularly as the views provide corridors that lead to or reveal important landmarks, townscape and landscape features. A positive approach to managing these views and landmarks over the long term is important, particularly given the increasing pressure to accommodate growth and new development within the Borough.

~~5.41.~~5.39. The London Plan identifies and includes policies to protect~~s~~ London Strategic Views which include significant buildings, urban landscapes and riverscapes that help to define London at a strategic level. There are two such strategic views traversing Lewisham. These are the 'London Panoramas' from Greenwich Park (General Wolfe's Statue) to Central London and Blackheath Point to Central London (the dome of St Paul's Cathedral). The London Plan sets ~~the~~ polic~~y~~ies f~~ramework~~ for managing these strategic views, with further guidance included in the Mayor's London View Management Framework (LVMF) ~~Supplementary Planning Guidance~~SPG, which development proposals should refer as appropriate. It is imperative that these panoramic views of London, and the key landmarks within them, are not compromised by new development and that ~~. It is also important that development is managed so that the viewers~~ people can continue to experience and enjoy them.

~~5.42.~~5.40. There are also a number of important Lewisham Local Views ~~in Lewisham~~ that warrant protection and positive management. In addition, a number of L~~l~~ocal L~~l~~andmarks have been ~~identified~~ designated because they add to the distinctive character and quality of the ~~townscape~~ the Borough and provide points of visual interest. These Local Views and Landmarks are listed in Figure 5.3 and Part 5 of the Local Plan.

~~5.43.~~5.41. Development proposals that are likely to affect London Strategic Views, Lewisham Local Views and Local Landmarks will be considered against the principles and policies for managing views~~, as set out~~ in the ~~draft~~ London Plan ~~Policy HC4 (London View Management Framework)~~. This includes consideration of impacts on the foreground, middle ground and background of the designated view and landmark features. In addition, proposals will be considered against ~~the full suite of~~ relevant Local Plan policies that seek to protect and enhance Lewisham's distinctive local character. Applicants are encouraged to refer the London View Management Framework SPG and the Council's Local Plan evidence base, including Conservation Area Appraisals and the Lewisham Characterisation Study (2019).

~~5.44.~~5.42. Development proposals should seek to enhance public access to viewing locations through public realm improvements. Opportunities should also be taken to create new local views and vistas. Proposals for major development, including where multiple sites are to be brought forward comprehensively, present particular opportunities to enhance views. Consideration should be given to the layout, orientation and height of buildings and spaces to enhance existing viewing corridors, or introduce new ones, to help reveal townscapes and landmarks. Development p~~P~~roposals should also maximise the visual amenity provided by watercourses in the Borough.

~~5.45.~~5.43. The ~~MHCLG Chief Planning Officer's letter (March 2017) placed a new requirement on Boroughs~~Council is required to consult the London Mayor where buildings are proposed in an area which may affect a Protected Vista, and where they are beyond the areas currently designated as Wider Consultation Area in the London View Management Framework SPG. Development po~~P~~roposals sited in the background of a Protected Vista must ~~pay attention~~have regard to the impact of the development on the view so that it does not harm the setting of the Protected Vistas, whether the proposal falls inside the wider setting consultation area of a protected vista or not. The Mayor of London has produced a map for indicative purposes showing the extensions to the background of the Protected Vistas.

QD 6 Optimising site capacity

A. Development proposals must use the design-led approach ~~demonstrate that the design-led approach has been used~~ to make the best use of land and optimise ~~a site's~~ the capacity of a site, with reference to Policy QD1 (Delivering high quality design in Lewisham).

~~A.~~B. To establish the optimum capacity of a site consideration must be given to the appropriate development density ~~of a site through the appraisal of design options,~~ having regard to:

a. The type and nature of uses proposed;
b. The site context, with reference to the site's immediate and surrounding area, taking into account:
    i. Location setting;

Commented [NE119]: This point has been addressed by A above, which in turn refers to the design-led approach and options appraisal set out in Policy QD1.

ii. Local distinctiveness and ~~urban~~ character, including heritage assets, with consideration given to the prevailing and/or emerging form and proportion of development in the area~~, with reference to Policy QD1.D (High Quality Design)~~;

c. Public Transport Access~~ibility~~ Levels, taking into account current levels and future levels expected to be achieved by the delivery of planned public transport infrastructure; and

d. Capacity of infrastructure ~~(including physical, environmental and social infrastructure)~~ to support the land uses and density proposed, having regard to the individual and cumulative impacts of development.

~~B.~~C. Development parameters for specific sites are set out in this Local Plan (Part 3 - site allocations). 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 (A) and (B) above.

Explanation

~~5.46.~~5.44. ~~As Lewisham continues to evolve in the context of London's growth it is imperative that development contributes to the delivery of high quality, inclusive, healthy, safe and liveable neighbourhoods. The key to achieving this will be to take a holistic and balanced approach to the way in which neighbourhoods function.~~The delivery of Good Growth will necessitate that new developments use the Borough's ~~This means ensuring that the~~ limited supply of land ~~is used~~ effectively and efficiently, whilst ~~also~~ improving the ~~physical and environmental~~ quality of places and spaces that people inhabit and use, along with the natural environment. ~~In order to meet the Borough's future needs and to support the delivery of the spatial strategy, it will be necessary to facilitate higher density development in appropriate locations, along with promoting a complementary mix of uses within Lewisham's neighbourhoods. This will help to secure equality of access for all to a wide range of housing options (including genuinely affordable housing), jobs and training opportunities, services and community facilities.~~

~~5.47.~~5.45. ~~Through the design-led approach, development~~ Development proposals ~~will be expected to~~must demonstrate how they will deliver the optimum capacity of a site. ~~The optimum capacity gives consideration to density, but it should not be taken as the maximum density. Rather,~~ The optimum capacity is one that is derived through careful consideration of density taking into account the site's local ~~context and~~ character, the types of uses proposed, access~~ibility~~ to public transport and the infrastructure available to support the development. The optimum capacity is not the maximum capacity or density. Development proposals ~~We will normally require~~should provide evidence of an options appraisal, undertaken at the early stage of the design process, which ~~has been used to inform the proposal and~~demonstrates the approach to achieving the optimum capacity. This requirement may be applied ~~flexibility on case-by-case basis~~flexibly~~,~~ taking into account the location, nature and scale of development. For instance, for householder and other smaller developments ~~schemes,~~ a planning statement ~~addressing the policy requirements~~ may be sufficient. ~~Applicants are advised to~~

Commented [NE120]: Respond to public consultation – request that heritage included in criterion for clarity

Commented [NE121]: Respond to public consultation – to help address concerns about indicative site development capacities on site allocations, this additional criterion is included to aid effective implementation of the plan.

Commented [NE122]: Policy supporting text amended throughout to make more concise and reduce repetition of points covered elsewhere in plan

consult with the Council's Planning Advise Service for further information on the requirements for specific sites and schemes.

5.48.5.46. The delivery of high quality development must begin withDevelopment proposals must demonstrate an understanding of a site's contribution to local character. in relation to its immediate and wider neighbourhood context. This includes consideration of the historical pattern of development, along with the existing and emerging urban character of the locality. Proposals are strongly encouraged to refer theThe Lewisham Characterisation Study (2019)should be referred at the early stage in the design-led approach. This study has informed the spatial strategy set out in this Local Plan and the character area policies in Part Three. It has also been prepared as a tool for the public and development industry stakeholders to engage with the planning process. Based on an objective assessment of character, it It provides is a useful starting point for considering densities and provides ann indication of those areas within the Borough where new development should broadly focus on reinforcing the established urban form and fabric, as well as those areas that may be more receptive to gradually managed change or transformation. The Characterisation Study is a useful starting point for considering appropriate densities and will be particularly helpful with defining a site's broad local context, for example, whether urban or suburban, along with the distinctive urban grain within this context.

5.49.5.47. Character is a very important consideration in determining the optimum capacity of a site but it is not the only consideration. Development should also respond to public transport accessibility, amongst other factors. Our approach to delivering Good GrowthThe spatial strategy requires that new and higher density development (including higher density development) is focussed within and around well-connected locations. where people can benefit from access to different modes of travel, and will not have to rely on cars or other vehicles. Proposals will be expected tomust demonstrate how they have responded to accessibility, including by referring the latest Public Transport Accessibility Level (PTAL) maps (published by Transport for LondonTfL), and also assessing opportunities available for walking and cycling, including those that could be delivered by the development itself. All development proposals will be considered on their individual site circumstances.

5.50.5.48. To help ensure that the optimum capacity of sites is realised, dDevelopment proposals should address both the existing and future transport accessibility levelsPTALs of a site and its surrounding area. Future accessibility should be considered in respect oftaking account of planned improvements and committed investments to Lewisham's the network of transport infrastructure. The phasing of development will need to be carefully managed, especially where infrastructure is planned but not yet implemented. This will be a particularly important consideration in Lewisham's Central and South Sub areas, where the delivery of the Bakerloo line extension will drastically improve Public Transport Accessibility LevelsPTALs over the long-term (see Part 3 of the Local Plan). Proposals will therefore be required to meet the requirements of Policies TR1 (Sustainable transport and movement) and TR2 (Bakerloo line extension), which set out further details in this regard.

~~5.51.~~5.49. ~~The optimum capacity of a site should also be informed by the existing and planned infrastructure within the locality. This includes the different elements of physical, social and environmental infrastructure that are required for well-functioning and liveable neighbourhoods, and which users of the new development will be reliant on.~~ The introduction of new, higher-density development within an area ~~, particularly higher density development,~~ may put pressure on existing facilities and infrastructure or create additional demands. Development proposals should therefore assess and plan positively for infrastructure needed to support the densities sought. This includes but is not limited to transport, community, green and other environmental infrastructure. Planning contributions and/or legal agreements may be used to ~~ensure that new development is appropriately supported by~~secure infrastructure~~, including community infrastructure in line Policy CI (Safeguarding and securing community infrastructure)~~.

~~5.52.~~5.50. ~~Finally, t~~The optimum capacity of a site should ~~be determined with reference to~~inform by the nature and mix of uses proposed. ~~For r~~Residential-led schemes ~~development, proposals~~ will generally be supported where density levels are appropriate to the local context and they deliver high quality ~~housing to meet local needs, particularly~~and genuinely affordable housing. ~~For c~~Commercial and industrial ~~uses it is important that development helps to support our strategic~~ developments ~~objectives~~should seek opportunities ~~for~~ to intensify~~ing~~ uses on employment sites~~, particularly~~ to deliver more jobs and new workspace. ~~.~~ Mixed-use schemes will require careful consideration of amenity for all users and activities. ~~Proposals incorporating employment uses should therefore be designed with reference to Policy E3 (Location and design of new workspace) and EC13 (Optimising the use of town centre land and floorspace).~~

~~5.53.~~5.51. To ~~assist with the design-led approach and to facilitate development that meets the Borough's growth requirements,~~ support the delivery of Good Growth, and ensure densities are appropriate to their location, we will prepare planning ~~Supplementary Planning Documents~~guidance ~~focussed on specific locations and site typologies~~for specific areas. This includes ~~guidance addressing the strategic~~ the Catford Town Centre Framework and the A21 ~~Corridor~~ Development Framework. The ~~and Lewisham's suburban areas, including small sites~~Small Sites SPD provides guidance to support the sensitive intensification of residential and other areas. ~~All development proposals will be expected to refer this guidance to achieve the optimum capacity and to support delivery of Good Growth.~~

QD 7 Amenity and agent of change

A. Development proposals ~~must~~must ~~-~~clearly demonstrate how ~~they will protect and wherever possible enhance the amenity of existing and future occupiers and uses, as well as the amenity of neighbouring properties and uses~~ noise and other nuisances will be mitigated and managed.

B. ~~When considering the amenity impacts of new d~~Development proposals must comply with the Agent of Change principle ~~will be applied~~ in accordance with the ~~draft~~ London Plan.

Commented [NE123]: Factual updates to ensure appropriate reference to Council's latest planning guidance

Commented [NE124]: This policy has been re-worked for legibility and to make the plan more concise. It consolidates the Amenity and agent of change policy together with those on noise (former QD8) and artificial lighting (former QD9). The policy principles are retained.

~~B.~~C. Development proposals ~~will be required to positively address amenity through~~ must use the design-led approach ~~in order~~ to protect and wherever possible enhance amenity whilst ensuring no unacceptable adverse impact on amenity, both for users of the development and those properties likely to be affected by the development, by ensuring:

a. ~~Make a~~Appropriate provision of privacy is made ~~both for users of the development and those in neighbouring properties~~, ensuring development does not result in unreasonable levels of overlooking;

b. ~~Ensure a~~Adequate provision for ~~and seek to optimise~~ outlook, and demonstrate how this has been optimised ~~for users of the development~~;

c. ~~Ensure a~~Adequate levels of ventilation, daylight, sunlight and open aspects including provision of private amenity space where appropriate; ~~and~~

d. New noise sensitive development is sited away from existing noise generating uses and activities, or where this is not possible, providing adequate separation and acoustic design measures; and

e. Green and open spaces are maintained as tranquil and quiet areas~~.~~; and

~~c.~~f. Development does not prejudice the use of playing fields.

~~d. Minimise and appropriately mitigate disturbances associated with the construction and operation of the development including noise, vibration, odour, fumes, dust, artificial light and site waste.~~

~~C.A. When considering the amenity impacts of new development the Agent of Change principle will be applied in accordance with the draft London Plan.~~

D. A Noise Impact Assessment and/or Vibration Impact Assessment ~~will be required to~~must be submitted with ~~proposals where they are~~applications for ~~noise sensitive developments or~~developments likely to involve a significant noise or vibration generating use.

Artificial lighting

E. Development proposals must be designed to ~~avoid adverse impacts of~~mitigate and manage light pollution ~~at all stages of the development, or make provision for appropriate mitigation measures. Proposals will be required to demonstrate that external~~by ensuring that lighting is:

a. Appropriate for its purpose in its setting;

b. Designed and operated to minimise and control the level of illumination, glare, angle and spillage of light, particularly to protect sensitive receptors such as residential properties and natural habitats, including water habitats; and

c. Energy efficient.

F. Development proposals adjacent to the River Thames must ensure that artificial lighting will not have an adverse impact on river navigation.

Commented [NE125]: Respond to consultation – clarification that some impact on amenity may result but this must not result in unacceptable impacts

Commented [NE126]: Public consultation – impact on neighbouring properties should be expanded to include properties likely to be affected by development

Commented [NE127]: Public consultation – this impacts on users and neighbouring properties should apply to all criteria in policy, not just a. Therefore, deleted text brought into front end of policy

Commented [NE128]: These policy points were moved from the former QD8 on noise

Commented [NE129]: Respond to consultation – request from Sport England

Commented [NE130]: This is now captured in criterion A above and elsewhere throughout the policy.

Commented [NE131]: Amended for consistency with London Plan

Commented [NE132]: Public consultation – request that water habitats referred for the avoidance of doubt

Commented [NE133]: Public consultation – to ensure no impact on river navigation

G. ~~Where a d~~Development proposals ~~includes an element of public realm, it should contribute to creating a safe and attractive environment~~ should seek opportunities to enhance the function, safety and appearance of the public realm through ~~the provision of~~ sensitively integrated external lighting, where appropriate, having regard to ~~(A) and (B)~~ (E) above.

Considerate construction

H. All new developments must make reasonable efforts to mitigate and manage traffic generation along with noise and other nuisances during the construction phase. ~~and~~Applicants and/or developers are encouraged to register with the Considerate Constructors Scheme or equivalent. Major development proposals must submit a Construction Method and Management Plan.

Explanation

~~5.54.~~5.52. It is important that new development contributes to the delivery of ~~Good Growth, including~~ high quality and healthy living environments that people can enjoy without disturbance ~~and live healthily in~~. ~~Lewisham is an inner London Borough with a sizeable resident and visitor population. It also accommodates a wide range of activities and land uses including for housing, industry and employment, transport and open space. In this urbanised setting, it is imperative that development is designed in a way that does not adversely impact on the amenity of people in the Borough at any given time, or on the ability of different uses to continue operating (where they are appropriately located). This is especially for economic, community and cultural uses that contribute to the vitality of neighbourhoods.~~

5.53. The ~~draft~~ London Plan ~~introduces~~establishes the 'Agent of Change' principle**.** This places the responsibility for mitigating the impact of noise on new development. ~~In practice t~~This means that where new developments are proposed close to existing noise generating uses, they must be designed ~~more sensitively~~ to protect the new occupiers from noise impacts. As well, where new noise generating uses are proposed close to noise sensitive uses the responsibility will be on the new use to ensure the building or activity is designed to protect the existing residents or uses from noise. Whilst the Agent of Change principle deals predominantly with noise it also addresses other nuisances including vibration, odour, fumes, dust, artificial light and site waste. When considering the impact of new development, w~~W~~e will apply the Agent of Change principle in accordance with the ~~criteria set out in draft~~ London Plan ~~Policy D12 (Agent of Change)~~.

~~5.55.~~5.54. ~~We will expect that all new development~~ Development must protect~~s~~ and wherever possible enhance~~s~~ local amenity~~. Amenity should be central to~~ using the design-led approach~~.~~ ~~with C~~careful consideration should be given to site selection along with the layout, design, construction and operation of buildings and spaces, including the public realm, at the early stage. ~~Proposals~~ Applications must provide a sufficient level of information to demonstrate that potential impacts have been identified, assessed and avoided or appropriately mitigated. ~~We will resist~~

Commented [NE134]: Amended for clarification and to aid policy implementation

Commented [NE135]: Respond to public consultation – request for policy to better manage impacts on amenity from construction activity

Commented [NE136]: The policy supporting text has been amended throughout to make more concise and to better align with the London Plan

Where there will be ongoing and future management of mitigation measures, these may be secured by planning obligations or legal agreements. P~~p~~roposals that are likely to cause unreasonable harm to the amenity of users of the development or occupants and uses in neighbouring properties will be refused.

~~5.56. Local amenity can be compromised or adversely impacted in a number of ways. Some examples include: the loss of daylight and sunlight to existing properties owing to extensions or new structures; excessive or obtrusive light; odour from restaurants and other commercial activities; vibration and pollution from industrial uses, railways, and roads; noise from cultural or entertainment facilities; and loss of privacy and diminution of outlook due to insensitively sited and designed development. All proposals for new buildings and uses should assess and proactively respond to local amenity having regard to site-specific circumstances. Compatibility of use should be a key consideration during the initial site selection process.~~

5.55. ~~Development proposals must appropriately respond to the immediate setting and wider neighbourhood context.~~ For new housing or other development near residential properties, proposals must ensure provision of adequate daylight, sunlight, ~~and~~ outlook and privacy. ~~Privacy is another key consideration and new development should not cause~~ Development should not cause significant or unreasonable harm in terms of overshadowing or overlooking. Proposals will be expected to take account of existing and proposed future uses, for example, by considering land use principles established by ~~existing~~ unimplemented planning consents, masterplans or ~~strategic~~ site allocation~~s~~ policies.

5.56. Proposals will be expected to submit a Noise Impact Assessment and/or Vibration Impact Assessment where sites are located in high-noise areas or where a new development is likely to generate significant noise or vibration. This will enable the consideration of how the existing noise environment affects any proposed noise sensitive development and the potential impact that new noise generating development will have on the local area.

5.57. The Council's Good Practice Guide: Control of Pollution and Noise from Demolition and Construction Sites has been prepared to assist developers and their contractors in ensuring that they carry out their works in the most considerate manner ~~in order to reduce the environmental impact and disturbance arising from their works~~. Transport for London also provides standing guidance on the Construction Logistic Plan required for major developments and the assessment of traffic movements, which applicants are encouraged to refer.

~~The draft London Plan introduces the 'Agent of Change' principle. This places the responsibility for mitigating the impact of noise on new development. In practice this means that where new developments are proposed close to existing noise generating uses, they must be designed more sensitively to protect the new occupiers from noise impacts. As well, where new noise generating uses are proposed close to noise sensitive uses the responsibility will be on the new use to protect the existing residents or uses from noise. We will apply the Agent of Change principle in accordance with the criteria set out in draft London Plan Policy D12 (Agent of Change).~~

~~5.57.~~5.58. Noise generating cultural and community venues (such as theatres, concert halls, pubs and live music venues) should be protected for the benefit of the wider community and the local economy. Development proposals ~~for schemes~~ in the vicinity of these types of facilities must be designed ~~in ways that~~ to ensure ~~established cultural and other venues~~such uses remain viable, can operate without the threat of closure due to noise complaints and can continue to operate as they are without licensing restrictions. This is particularly important in Lewisham's town centres, Cultural Quarters and the Creative Enterprise Zone~~, where a critical mass of cultural venues and community facilities is necessary to support the Local Plan's strategic objectives.~~

~~5.58. Noise sensitive development such as housing, hospitals, day centres and schools proposed close to noise-generating uses must include acoustic design measures that are developed within the scheme from an early stage. Even greater care must be taken where it would have a disproportionate effect on more vulnerable people such as the elderly or young children. Measures that could be employed to overcome impacts could include soundproofing or insulation. The Mayor's London Environment Strategy provides further guidance on managing and mitigating noise in mixed-use development and town centre development.~~

5.59. We will seek to protect open spaces as tranquil havens with positive soundscapes where people can interact with the natural acoustic environment, including natural sounds, animal vocalisation, weather, water and river flows. Development proposals should recognise and respond positively to the value of tranquil and quiet areas. Opportunities should be taken to protect and enhance these environments for the benefit of the local community and biodiversity.

Artificial lighting

5.60. Artificial lighting can ~~play an important role in supporting safe, accessible and liveable neighbourhoods~~make a positive contribution to the quality of places. For example, it can help to ensure a safe and legible environment for ~~movement within the Borough, including by~~ walking and cycling; ~~. It can also~~ extend opportunities for leisure, sport and recreation by enabling evening and night-time use of facilities ~~and the public realm. In addition, external lighting can contribute to local character and place-making by~~; and enhancinge the ~~visual~~ appearance of buildings and townscapes. If not appropriately managed however, artificial lighting has the potential to become light pollution which can present physiological, ecological and other environmental issues.

5.61. Details of lighting schemes should be in line with the latest industry guidance published by the Institute of Lighting Professionals. Proposals should take into account that Lewisham, on the whole, falls within Zone 3 Medium District Brightness Areas. However this will need to be established on a case-by-case basis as there are variations in localities, for example, in Lewisham Town Centre where Zone 4 may apply. Residential development proposals should seek to achieve the 2-LUX standard.

~~5.60.~~5.62. Development should provide sensitively integrated lighting within the public realm to contribute to safe and attractive environments. ~~This includes footpaths, cycleways and public opens spaces and parking areas. However, p~~Proposals will need to ~~ensure that an appropriate balance is struck with managing safety requirements and~~address the potential adverse effect of lighting on amenity and biodiversity, including water habitats. Lighting from new buildings ~~will~~ must be designed and positioned in a way that minimises floodlighting. Where public areas need to be lit close to green and water spaces, careful positioning of light sources will be required, with the beam directed away from sensitive areas such as trees and rivers. The use of time or movement sensitive lighting is encouraged to support benefits to biodiversity and energy conservation.

5.63. This policy is separate from statutory artificial lighting nuisance controls relevant to the Clean Neighbourhoods and Environment Act 2005 and Environmental Protection Act 1990.

~~QD 8 Noise and vibration~~

Commented [NE137]: This policy and its supporting text has been brought into the revised Policy QD7 Amenity and Agent of Change. Some policy points deleted to avoid unnecessary duplication.

~~Development proposals should be designed to avoid or minimise the harmful impacts of noise and vibration at all stages of the development, having regard to the Agent of Change principle.~~

~~New noise and vibration generating development must be appropriately located away from noise sensitive uses and suitably demonstrate that measures will be implemented to mitigate any adverse impacts.~~

~~New noise sensitive development should be located away from existing or planned sources of noise pollution. Where this is not reasonably practical proposals must demonstrate that:~~

~~Internal and external noise levels can be satisfactorily controlled and managed; and~~

~~There will be no adverse impact on the continued operation and amenity of adjoining and neighbouring uses, having regard to Policy QD7 (Amenity and agent of change).~~

~~A Noise Assessment and/or Vibration Assessment will be required to be submitted with proposals where they are noise sensitive developments or involve a noise or vibration generating use.~~

~~**Explanation**~~

~~It is important for the mental health and wellbeing of Lewisham's resident and visitor population that noise is managed to acceptable levels. There are a wide range of land uses and activities within the Borough, including significant noise generating uses (such as industrial activities) or buildings that are sensitive to noise by virtue of their users or environment (such as schools, health facilities and housing). This policy seeks to ensure that new development provides for the protection of amenity where there is an interaction between noise generating or noise sensitive uses.~~

~~New development should be designed to avoid or minimise disturbance from noise pollution and vibration, including by appropriately mitigating impacts on site users and adjacent land uses. We will seek to ensure that noise is managed to acceptable levels having regard to the relative ambient noise levels and the character of the locality. All proposals should consider noise and vibration in the site selection process and, where necessary, address mitigation measures from the early stages of the design-led approach.~~

~~New noise sensitive development (such as housing and community infrastructure) should be located away or appropriately separated from existing or planned sources of noise pollution. This is especially important where noise could have a disproportionate effect on vulnerable groups such as children, young people or the elderly. Appropriate mitigation measures in the design, internal layout and treatment of the building and façade will be required. This includes adequate sound insulation to minimise the adverse impacts of noise, such as from railways, roads or commercial activities. Consideration should also be given to the provision of natural or mechanical ventilation where, for acoustic reasons, an alternative to opening windows is required.~~

~~Proposals will be expected to submit a Noise and/or Vibration Assessment where sites are located in high noise areas or where a new development is likely to generate significant noise. This will enable the consideration of how the existing noise environment affects any proposed noise sensitive development and the potential impact that new noise generating development will have on the local area.~~

~~The Council's Good Practice Guide: Control of Pollution and Noise from Demolition and Construction Sites has been prepared to assist developers and their contractors in ensuring that they carry out their works in the most considerate manner in order to reduce the environmental impact and disturbance arising from their works. Transport for London also provides standing guidance on the Construction Logistic Plan required for major developments and the assessment of traffic movements, which applicants are encouraged to refer.~~

~~QD 9 External lighting~~

~~A. Development proposals incorporating external lighting will be supported where they protect, and wherever possible enhance, local character, amenity and natural habitats. Development proposals must be designed to avoid adverse impacts of light pollution at all stages of the development, or make provision for appropriate mitigation measures. Proposals will be required to demonstrate that external lighting is:~~

- ~~a. Appropriate for its purpose in its setting;~~
- ~~b.a. Designed and operated to minimise and control the level of illumination, glare, angle and spillage of light, particularly to protect sensitive receptors such as residential properties and natural habitats; and~~
- ~~c.a. Energy efficient.~~

~~B.A. Where a development proposal includes an element of public realm, it should contribute to creating a safe and attractive environment through the provision of sensitively integrated external lighting, where appropriate, having regard to (A) and (B) above.~~

~~Explanation~~

Commented [NE138]: This policy and its supporting text has been brought into the revised Policy QD7 Amenity and Agent of Change. Some policy points deleted to avoid unnecessary duplication.

5.61.1.1. Artificial external lighting can play an important role in supporting safe, accessible and liveable neighbourhoods. For example, it can help to ensure a safe and legible environment for movement within the Borough, including by walking and cycling. It can also extend opportunities for leisure, sport and recreation by enabling evening and night-time use of facilities and the public realm. In addition, external lighting can contribute to local character and place-making by enhancing the visual appearance of buildings and townscapes.

5.62.5.64. If not appropriately managed however, artificial lighting has the potential to become light pollution which can present physiological, ecological and other environmental issues. There are three main types of light pollution: sky glow (the brightening of the night sky), glare (the uncomfortable brightness of a light source when viewed against a darker background) and light intrusion or trespass (the spilling of light beyond the boundary of the property or area being lit). All such pollution results in excessive or obtrusive light that may cause nuisance to the population, adversely impact on the amenity of properties and harm habitats and biodiversity. External lighting can also result in unnecessary and inefficient energy use. We will therefore seek to ensure that development proposals make appropriate provision for the design and use of external lighting.

5.63.1.1. Details of lighting schemes should be in line with the latest industry guidance published by the Institute of Lighting Professionals. Proposals should take into account that Lewisham, on the whole, falls within Zone 3 Medium District Brightness Areas. However this will need to be established on a case-by-case basis as there are variations in localities, for example, in Lewisham Town Centre where Zone 4 may apply. Residential development proposals should seek to achieve the 2 LUX standard.

5.64.1.1. Development should provide sensitively integrated lighting within the public realm to contribute to safe environments. This includes footpaths, cycleways and public open spaces and parking areas. However, proposals will need to ensure that an appropriate balance is struck with managing safety requirements and the potential adverse effect of lighting on amenity and biodiversity, including water habitats. Lighting from new buildings will must be designed and positioned in a way that minimises floodlighting. Where public areas need to be lit close to green and water spaces, careful positioning of light sources will be required, with the beam directed away from sensitive areas such as trees and rivers. The use of time or movement sensitive lighting is encouraged to support benefits to biodiversity and energy conservation.

5.65. This policy is separate from statutory artificial lighting nuisance controls relevant to the Clean Neighbourhoods and Environment Act 2005 and Environmental Protection Act 1990.

HO 5 OD 8 High quality housing design

Commented [NE139]: This policy has been moved from its previous position in the Housing section (former reference Policy HO5)

A. High quality design is integral to ensuring housing that meets the diverse and changing needs of Lewisham residents over their lifetimes. All new housing development proposals for housing should must ensure provisionde for adequately-sized rooms and living spaces, with comfortable and functional layouts and along

~~with~~ well-integrated amenities. This includes development proposals for new-build housing ~~development~~, changes of use, alterations and extensions.

B. Development p~~P~~roposals for ~~new~~ housing ~~development~~ must meet, and wherever possible seek to exceed, the housing standards set out in the London Plan, including the minimum standards for:

a. Private internal space, having regard to:

i. Internal floor area and built-in storage area;

ii. Bedroom size;

iii. Ceiling height

b. Private outside space, having regard to:

i. Outside space adequate for the intended number of occupants;

ii. Minimum depth and width of balconies or other private outdoor spaces;

c. Communal amenity space; and

d. Children's play space, having regard to Policy CI 3 (Play and informal recreation).

C. Development proposals for ~~new~~ housing must address the qualitative design aspects set out in ~~draft~~the London Plan Policy D4~~5~~6 (Housing quality and standards) and corresponding Table 3.2, covering the detailed considerations for:

a. Layout, orientation and form;

b. Outside amenity space; and

c. Usability and ongoing maintenance.

D. Development proposals for h~~H~~ousing ~~development should~~must be designed to be inclusive, accessible and safe to all, ~~having regard to the requirements of~~with reference to Policy QD2 (Inclusive and safe design).

E. Development proposals for h~~H~~ousing ~~development should~~ must be designed to protect and enhance amenity of building occupants, as well as that of adjoining site users and uses, in line with Policy QD7 (Amenity and agent of change). They must ensure adequate provision of natural light with reference to the latest Building Research Establishment (BRE) good practice guidance, currently BR209: Site layout planning for daylight and sunlight, or suitable equivalent.

Commented [NE140]: Respond to consultation – further detail on daylight and sunlight, right to light considerations

F. Development proposals for h~~H~~ousing ~~development~~ must be designed to be 'tenure blind' and 'tenure neutral' to ensure that houses across all tenures are indistinguishable from one another in terms of quality of design and materials, space standards, access and amenity provision. Further details on 'tenure neutral design are set out in Policy QD2 (Inclusive and safe design).

G. Development proposals for h~~H~~ousing ~~development should~~must maximise the provision of dual aspect dwellings. Proposals for single aspect dwellings, particularly north facing dwellings will be resisted and ~~should~~ only be ~~considered in exceptional circumstances,~~permitted where it can be suitably demonstrated that ~~it~~the development will provide ~~for~~ a more appropriate design solution than a dual aspect dwelling, having particular regard to:

Commented [NE141]: Respond to consultation – London Plan guidance seeks to avoid north facing single aspect dwellings, so merits signposting

a. Site or b~~B~~uilding size, layout and orientation;
b. Outlook for occupiers;
c. Microclimate management including for heating, cooling and ventilation; and
d. Amenity including adequate privacy and protection against exposure to odour, noise, light and air pollution.

Commented [NE142]: Respond to consultation – consideration of site size and orientation should be included

Explanation

5.65. Everyone should have access to a decent and secure home that is adaptable to one's changing needs over their lifetime. ~~We will seek to ensure that~~ A~~a~~ll new housing development, irrespective of tenure, ~~is~~must be designed to a high quality standard ~~and~~ in order to meet~~s~~ the diverse needs of Lewisham's resident population, taking into account those who choose to live independently, families (including with children) and others sharing accommodation, and those requiring managed support or care. This includes new build housing, ~~as well as proposals involving~~ the alteration or extension of existing housing units, ~~as well as~~and the conversion of other buildings into housing.

5.66. The quality and standard of housing is a key issue in Lewisham. One in four residents now live in the private rented sector, which is double that of 15 years ago. We estimate that a quarter of private rented properties are non-decent. As further evidence, between January 2015 and October 2018 the Council received over 2,000 complaints about the condition of private rented properties. We inspected all these properties and found around half of them had poor energy efficiency (rating of D or below). Whilst the proportion of social housing units meeting the Decent Homes standard increased from 41% to 94% in the ten years from 2007, the Council's own research suggests private sector housing is not achieving the same level of standards.[63]

5.67. We will apply the London Plan space standards when considering housing proposals (including for internal and outside space, communal amenity space and children's play space). We will also have regard to the qualitative design aspects set out in ~~draft~~ London Plan Policy D4~~6~~, along with other Local Plan policies. Applicants are advised to refer the London Plan for further details. Development proposals must meet and should seek to exceed the minimum standards.

5.68. ~~Housing d~~Developments proposals ~~should seek to maximise the provision of genuinely affordable housing. They should also~~must support mixed and inclusive neighbourhoods and communities by ensuring that housing of all tenure types are designed to a high quality standard and well-integrated, both within the site and~~development and with neighbouring residential properties~~ neighbourhood. Housing ~~should~~must be designed to be 'tenure blind' so that affordable housing buildings and units are similar to market housing in design quality, including external appearance, with entrances and access routes that promote social inclusion. Communal amenity spaces must be accessible to all residents of the development, regardless of tenure.

[63] Lewisham Housing Strategy 2020-2026. Lewisham Council

5.69. Dual aspect dwellings with opening windows on at least two sides have many benefits for the amenity of building occupiers, including for daylight, outlook and natural ventilation. Single aspect dwellings do not offer the same benefits, particularly for natural ventilation, which is problematic in terms of climate change adaptation. Single aspect dwellings ~~will therefore only be acceptable in exceptional circumstances, and~~ should be avoided where they are north facing, contain three or more bedrooms, or exposed to noise and air pollution levels above which significant adverse effects on health and quality of life occur. The design of single aspect dwellings must demonstrate that all habitable rooms and the kitchen are provided with adequate passive ventilation, privacy, daylight and outlook, and that the unit's microclimate will be appropriately managed.

QD ~~10~~ 9 Building alterations, extensions and basement development

A. Development proposals for building alterations, ~~and~~ extensions and basements must be ~~of a high~~designed to a high quality ~~design~~standard~~,~~ and have regard to the Council's Alterations and Extensions SPD ~~(2019)~~.

B. Development proposals for building alterations and extensions ~~must respond positively to the context, character and distinctiveness of the site and host building. Proposals~~ will only be supported where they:

   a. Respect and complement the form, proportion, setting, period, architectural characteristics and detailing of the original building and the site;
   b. Use high quality, durable and matching or complementary materials;
   c. Maintain and wherever possible enhance, and do not adversely impact on, the architectural integrity of a group of buildings as a whole, or cause an incongruous element in terms of the important features of an area's character; and
   d. Do not adversely impact on, or result in the loss of, the amenity of neighbouring properties, including back gardens~~, in line with other Local Plan policies~~.

C. Innovative and contemporary designs will only be supported where they are of an exceptional design quality and comply with (B) above~~. Where proposals seek to integrate a contemporary design and/or materials, careful consideration will be required to ensure that the distinctive character and features of the original building are respected and not harmed~~.

D. Roof extensions on the street frontage of a building, particularly within predominantly residential street, should be avoided in favour of extensions to the rear of the building. Development proposals for roof extensions on the street frontage will only be supported where it is demonstrated that there is a clear design rationale, a design options appraisal has been undertaken that demonstrates an extension to the rear of building is not feasible or appropriate, and other policies are satisfied.

~~C.~~E. Residential extensions should retain an accessible and functional private garden area which is appropriate in size in relation to building and the intended

Commented [NE143]: This is already covered in Policy QD1 and addressed in more detail in criterion a below

Commented [NE144]: Respond to consultation – stronger policy wording

Commented [NE145]: Amended to make more concise - this point is captured in B above.

number of occupants of the dwelling. Development proposals should seek to retain 50 per cent of the original garden area.

~~D.~~F. New units or rooms created by a residential alteration or extension must ensure adequate living and amenity ~~and~~ space for all ~~building~~ intended occupiers.

Basement development

G. Proposals for basement development must ~~be accompanied by~~include a Basement Impact Assessment ~~and~~ .

~~E.~~H. Basement development will only be permitted where it can be suitably demonstrated that the development:

a. Is sensitively integrated into the site, proportionate to host building (including the original building in the case of a basement extension) and avoids harm to local and historical character;
b. Will not adversely impact on the structural stability of the host building, neighbouring properties, infrastructure and the public realm, taking into account local geology;
c. Will not result an increase to flood risk~~, having regard particular regard to Policy SD7 (Reducing flood risk);~~ whilst ensuring users of the development will be safe from all sources of flooding.
d. Will not adversely impact on the natural environment; and
e. Will not adversely impact on the amenity of neighbouring properties on occupation and use, and ~~will~~ minimise impacts on amenity during ~~the~~ construction ~~phase~~.

~~F.~~I. ~~Where a r~~Proposals for residential basement development extendings beneath the garden area~~, proposals~~ must demonstrate that:

a. There will be no loss of or harm to trees of value, including amenity and townscape value, ~~in line with Policy GR4 (Urban greening and trees)~~; and
b. The development will maintain adequate soil depth satisfactory for landscaping, taking into account impacts on and requirements of neighbouring properties.

J. Development proposals for basements including habitable rooms for ~~residential use~~housing, or other sensitive uses, must ensure safe access and egress for all likely users of the development. ~~Proposals will be refused where they do not suitably demonstrate that all likely users of the development will be safe from all sources of flooding.~~

~~G.~~K. Development proposals for basements including toilets, bathrooms or other waste outlets must install an appropriate pumped device to protect occupiers and the property from sewer flooding.

Commented [NE146]: Respond to consultation – policy principles included in extant DM31 which are not adequately coverd by the SPD and should therefore be retained in new plan

Commented [NE147]: Respond to consultation – clarification required on safe design for basement development

Commented [NE148]: Respond to consultation – clarification on safe design for basement development

Light wells

~~H.~~L. Development proposals for light wells ~~will only be supported where they~~must respect the architectural and historical character of the host building and its wider setting, and ~~do~~ not adversely impact on the amenity of neighbouring properties. Light wells should be sensitively integrated ~~into the site~~ and designed to avoid the loss of amenity space, including garden land. Proposals that ~~would~~ will result in an excessive or harmful loss of amenity space will be resisted.

Explanation

~~Alterations and extensions~~

~~5.66.~~5.70. ~~We want to ensure that the highest design quality is achieved through all new~~All new ~~development, including~~building extensions, ~~and~~ alterations and basement developments must be designed to a high quality standard. ~~This is particularly~~Where this type of development is poorly designed and built it can have an adverse impact on local character, particularly ~~where alterations or extensions are proposed to existing homes or~~ on buildings of historic interest or within established residential areas, including Conservation Areas and Areas of Special Character. ~~In response to the strong local interest from householders and other members of the public with respect to this type of development, we have prepared an~~The Council's Alterations and Extensions SPD (2019) should be referred as appropriate. This guidance document sets out clear principles and ~~development~~ guidelines to help householders and others to deliver high quality developments. ~~that help to support implementation of the Local Plan. All proposals will be expected to refer to the SPD, as appropriate.~~

~~5.67. The Lewisham Characterisation Study (2019) discusses how the urban grain and local character of neighbourhoods varies greatly throughout the Borough, with remnants of historic development surviving to the modern day. Development proposals need to be well thought out, using the design-led approach to ensure a fundamentally site specific response to the urban grain. This will help to ensure alterations and extensions are sensitive to their local and historical context, and do not adversely impact on the amenity of neighbouring properties.~~

5.71. Extensions to residential buildings should normally be subordinate in scale to the original building. This is in order to ensure that new development does not dominate existing and well-established features of the building or setting, or result in disproportionate additions that detract from local character. Alterations and extensions must also respect the architectural qualities and coherence of the urban grain, for example, by taking into account the distinctive qualities of blocks or terraces of buildings and ~~not undermining~~responding to their established uniformity.

~~5.68.~~5.72. Additional or enlarged windows, doors and other openings, should be in keeping with the original pattern, and in the case of a roof extension should reflect the existing alignment of the windows. Replacement windows where controllable by the Council should closely match the pattern of the original windows. The repair of original windows will be encouraged.

Commented [NE149]: Policy supporting text amended throughout to make more concise

~~5.69.~~5.73. Innovative, high quality and creative contemporary design~~s solutions that respond positively to the site context will be supported in principle, so long as the design~~ should carefully consider~~s~~ the architectural language and integrity of the original building and its setting, and avoid~~s any~~ awkward jarring building forms that detract from local character.

Basement development

~~5.70.~~5.74. Basement developments are becoming an increasingly popular way for householders to adapt their homes to changing lifestyles and needs, for example, to create more amenity or living space ~~or accommodate larger families~~. They also ~~also offer opportunities for~~enable businesses and organisations to ~~make a more optimal use of land and space in a highly urbanised area like Lewisham, for instance, by accommodating additional workspace or~~ make extra operational space on existing premises. ~~Whilst recognising the role that basements can play in meeting the needs of the local population,~~ Basement development poses unique design challenges and it is important that these are appropriately considered and addressed. ~~development does not adversely impact on local character and the environment or harm the amenity of neighbouring properties, whether during the construction or occupation phases.~~

~~5.71.~~5.75. Not all new basements will require planning consent ~~as there are~~owing to permitted development rights ~~covering some types of development~~. Where planning permission is required, ~~we will consider~~ proposals will be assessed against the Local Plan policies ~~to ensure new basement developments are appropriately integrated into the site and local area~~. ~~Particular c~~Consideration ~~will need to~~must be given to impacts on structural stability of the host building and adjoining properties, as well as to any environmental impacts that are likely to arise from the development~~, including during its construction phases.~~ These matters ~~should~~ must be addressed through ~~the~~ a Basement Impact Assessment (BIA)~~, which we will require~~ to be submitted at the application stage. The BIA must be carried out by a suitably qualified and recognised independent assessor and paid for by the applicant. ~~Basement development P~~proposals will be ~~strongly resisted~~refused where it cannot be demonstrated that harmful impacts ~~can~~ will be avoided or appropriately mitigated. Impacts on amenity should be minimised as much as reasonably practical during construction. Depending on the nature and scale of development a Construction Management Plan may be required, and this will be secured by condition or legal agreement.

~~5.72.~~5.76. ~~Applicants will also be expected to ensure that harmful impacts on amenity are minimised as much as reasonably practical during the construction phase of development. Details should be provided of measures to address local amenity at all phases of development. Depending on the nature and scale of proposals, construction management plans may be secured by condition or legal agreement.~~

Light wells

~~5.73.~~5.77. Light wells can ~~help to~~ enhance the amenity of a building's users and occupiers. ~~. However the introduction of light wells can harm local character, including historical character, particularly where they are poorly designed or not in keeping with the established features of a street or neighbourhood. All proposals for light wells must be designed to a high quality standard, with careful consideration given to their integration within the site along with their relationship to the host building and wider setting. Additionally, proposals will be expected to demonstrate that there will be no~~ Careful consideration is required to ensure new light wells do not have an adverse impact on amenity, ~~particularly~~ including nuisance caused by ~~in terms of~~ light pollution ~~which is a concern with development of this type~~. Light wells should not result in an excessive or harmful impact on amenity space, including garden land. We will ~~seek to~~ resist proposals that ~~would~~ will result in a significant loss of amenity space, taking into account the ~~nature of the proposal along with the~~ amount and quality of amenity space on site.

QD ~~11~~ 10 Infill and backland sites, garden land and amenity areas

~~Key principles~~

A. Development proposals on infill and backland sites, garden land (including back gardens) and amenity areas will only be acceptable where:
   a. The use is appropriate to the site and ~~compatible with~~ will not result in an unreasonable adverse impact on the amenity of neighbouring land uses and properties, including their rear gardens ~~in site's immediate vicinity and surrounding area~~; ~~and~~
   b. The requirements for Neighbourhood Open Space are adequately addressed, where relevant, with reference to Policy GR3 (Open Space); and
   ~~b.~~c. The development has a clear urban design rationale, having regard to the Council's Small Sites SPD.

B. Where ~~development on infill and backland sites, garden land and amenity areas is acceptable in principle, having regard to~~the requirements of (A) above are satisfied, development proposals must:
   a. Be ~~designed to~~of a high quality ~~standard~~ design and respond positively to the site context and local character, including historical character;
   b. Be sensitively integrated into the site, including by responding to the sizes and proportions of adjoining and neighbouring buildings, as well as the spaces between buildings;
   c. Retain trees and integrate high quality landscaping, in line with Policy GR~~3~~5 (Urban Greening and Trees);
   d. Ensure ~~appropriate~~ safe and convenient access for all users of the development;
   ~~d.~~e. Make adequate arrangements for ~~safe access and~~ servicing the building and site. ~~, including by retaining and enhancing existing walking and cycle routes and access wherever possible; and~~
   ~~e. Do not result in harmful overshadowing or overlooking, or otherwise adversely impact on the amenity of neighbouring properties, including their rear~~

Commented [NE150]: Amended to bring in line with revised Policy GR3, recognising some amenity areas may be non-designated open spaces (i.e. Neighbourhood Open Spaces)

~~gardens, or the occupiers of the development, having regard to other Local Plan policies.~~

~~C. Proposals for housing development must meet the amenity and space requirements set out in the Local Plan, also taking into account relevant guidance, including the London Mayor's Housing Supplementary Planning Guidance.~~

Infill sites

~~D.~~C. Development proposals within street frontages and on street corners will only be supported where they:

a. Make a positive contribution to local character, including historical character; particularly by responding to the distinctive ~~qualities~~ character of the street and street frontage;
b. Maximise opportunities to repair harmful breaks, or the appearance of buildings, which detract from the character of the street frontage;
c. Are sensitively integrated into the street frontage, including by respecting the proportions and spaces of and between existing buildings; and
d. Retain appropriate garden space for adjacent residential properties.

Backland sites

~~E.~~D. Development proposals on backland sites will only be supported where they:

~~a. Provide accessible, safe and convenient access for all intended users of the development;~~
d~~D~~o not introduce gates or other design features that unnecessarily restrict or prevent public access to or through the site.

Garden land (including back gardens)

~~F.~~E. Garden land makes an important contribution to the character and amenity of Lewisham's neighbourhoods, and often has biodiversity value. The use of garden land for new development should therefore be avoided.

~~G.~~F. Development p~~P~~roposals that ~~would~~ will result in the loss of garden land, including private back gardens, will be strongly resisted. This includes the development of back gardens for separate dwellings in perimeter forms of housing. The loss of garden land will ~~normally~~ only be considered acceptable in exceptional circumstances where:

a. The proposal is for comprehensive redevelopment of a number of whole land plots; and
b. The requirements of (A) and (B) above are satisfied.

Amenity areas

~~H.~~G. Development proposals on amenity areas of landscaped open space ~~attached~~ adjoining~~to~~ existing residential buildings will only be supported where they:

a. Repair, reinstate or re-provide active street frontages;

Commented [NE151]: Removed to make more concise – this point is covered elsewhere in the plan including QD7 Amenity and agent of change

Commented [NE152]: Removed to make more concise – this is covered elsewhere in the plan.

Commented [NE153]: Repetition – this is covered elsewhere in the plan as a principle that applies to all development

Commented [NE154]: Amended to aid policy implementation - there may be valid reasons to restrict access to part of all of some sites, mainly owing to public health and safety

b. Retain existing private garden space; and
c. ~~Support~~ Apply inclusive and safe design principles, ~~particularly by~~and seek opportunities to ~~enhancing~~ enhance natural surveillance.

Explanation

Commented [NE155]: The policy supporting text has been amended throughout to make more concise

~~5.74.~~5.78. ~~To deliver the spatial strategy for the Borough we will seek to direct new development to key locations (such as Opportunity Areas and town centres) and also ensure new development optimises the use of land within these locations. However, T~~there ~~may also be~~are opportunities throughout the Borough to make a more beneficial use of land and improve the quality of local areas through the redevelopment of small~~er~~ sites., ~~such as backland and infill sites, as well as garden land and amenity spaces. This is particularly where new~~ New and sensitively integrated development on small sites can help~~s~~ to enhance local character, such as by repairing harmful breaks in street frontages through infill development or activating vacant backland sites., ~~and provides new~~ Small sites can also accommodate new housing, business space and other uses to meet local needs~~, as supported by policy HO2 (Optimising the use of small housing sites)~~.

~~5.75.~~5.79. ~~To help ensure that new development is designed to a high quality standard and responds positively to local character, T~~this policy addresses the ~~different~~ types of small site~~s~~ ~~opportunities, as~~ set out below.

- Infill sites: sites within street frontages (such as former builders' yards, small workshops and garages, gaps in terraces and gardens to the side of houses).

- Backland sites: 'landlocked' sites to the rear of street frontages and not historically in garden use (such as builders' yards, small workshops and warehouses, and garages), often in close proximity to existing housing.

- Garden land (including back gardens): private amenity areas that were the entire back garden to the rear of a dwelling or dwellings as originally designed. Garden land is not defined as Previously Developed Land, as set out in the NPPF.

- Amenity areas: communal amenity areas attached to or associated with residential development. Examples of these are: private communal gardens for small blocks of flats landscaped spaces around taller blocks of flats and around low and medium rise 'slab blocks', where typically the distinction between the public and private realms is ambiguous and which provide a generally less secure environment as a result.

~~5.76.~~5.80. These small site typologies cover the majority of sites that will require consideration under this policy (extensions and alterations are dealt with separately in this Local Plan). However, ~~it is recognised that~~ there may be some instances where a ~~particular~~ site will not fall definitively within any one of these

categories. In such cases, the principles that will be applied for planning decisions will be taken from the appropriate parts of this policy. The Council will make a determination of the relevant policies, informed by the planning statement submitted by the applicant.

~~5.77.~~5.81. Not all infill~~, backland, garden land and amenity area~~ sites will be considered appropriate for new development~~,~~ or for certain types of land uses. Backland, garden land and amenity area sites will only be acceptable for new development where proposals comply with the above policies. ~~All proposals will be considered on a case-by-case basis, taking into account the nature and scale of the proposed use, along with the site context and character. All planning applications will be required to~~Development proposals must clearly demonstrate that the ~~development~~ site is appropriate for the proposed use(s), ~~and that~~ there is a clear urban design rationale for bringing forward development at ~~this~~ the location and there will be no adverse impact on amenity. This should be set out in the Design and Access Statement, and informed by the Council's Small Sites SPD and associated Small Sites Development Strategy document. Some amenity areas may be Neighbourhood Open Spaces and proposals must therefore ensure compliance with Policy GR3 (Open space).

Commented [NE156]: Respond to consultation – clarification to ensure text aligns with policy principles

Commented [NE157]: Amended to refer Council's recently adopted Small Sites SPD and Development Strategy document

~~5.78. We will resist proposals that do not suitably demonstrate that development will make a positive contribution to local character and protect the amenity of neighbouring properties.~~

Commented [NE158]: Repetition – this is covered elsewhere in the plan

Infill and backland development

~~5.79.~~5.82. ~~All~~ Development proposals for infill and backland development must ~~informed by~~follow the design-led approach. ~~This will help to ensure that new development responds positively to the local context and is sensitively integrated into the locality, taking into account the visual and functional qualities of the site and its surrounds.~~ Careful consideration will need to be given to the distinctive character and features of the site and its wider setting. This includes the streetscape and architectural detailing, along with the proportions and orientation of buildings, including the spaces between them. Development on mid-terrace sites will require particular attention to ensure they complement the character of the street and provide a positive frontage. Infill development provides ~~particular~~ opportunities to repair harmful breaks in the street frontage.

~~5.80.~~5.83. Access and servicing requirements of backland sites ~~will be an important factor when considering development proposals~~poses unique design challenges. Development proposals must ~~be designed to~~ ensure adequate arrangements for all vehicles likely to require access the site, including for emergency services, refuse and recycling collection and deliveries. Proposals must also ensure safe and convenient access to the site and buildings by walking and cycling.

~~5.81.~~5.84. Development proposals ~~on infill and backland sites~~ should seek to ~~ensure that~~ retain and enhance existing walking routes and cycleways ~~connections, whether formal or informal, are retained~~ in order to . Where this is not feasible or

preferential in design terms adequate replacement provision must be provided. The design must ensure permeability within the site and the rest of the neighbourhood. Gated developments ~~are considered to be less secure due to the reduction of natural surveillance, and also adversely impact on site permeability and integration~~will be strongly resisted. ~~It is also important that development does not result in a loss of security to adjacent dwellings.~~

~~5.82.~~5.85. Where development proposals include new housing ~~development is proposed, this should ensure compliance with other relevant Local Plan policies, having particular regard to Policy HO5 (High quality housing design)~~ this must be designed with reference to other Local Plan policies. Provision of accessible, secure, private and ~~usable~~ functional ~~external~~ outdoor amenity space, includ~~e~~ing ~~space~~ children's play space, will be required where appropriate. ~~Garden~~ Outdoor amenity space, including garden land, must not be ~~provided~~ delivered in a piecemeal fashion ~~in a series of small garden areas,~~. Rather this must be designed in an integrated way to ensure it is ~~but as a usable~~ functional space suitable for the intended occupants.

Garden land (including back gardens)

~~5.83.~~5.86. Garden land, including back gardens, make an important contribution to local character and amenity and often have ecological value. Development on garden land should therefore be avoided in favour of development opportunities elsewhere in the Borough, particularly on brownfield sites and previously developed land, consistent with the spatial strategy for the Borough. The NPPF is clear that garden land is not considered Previously Developed Land.

~~5.84. The Lewisham Characterisation Study (2019) examines the different features of the Borough's built and natural environment. It identifies various urban typologies where the built form relies on more or less regular street forms, building facades, and garden areas. The study helps to provide an indication of where new development on garden land, including back gardens, is are likely to have an adverse impact on the urban grain and local character. Applicants are strongly advised to refer the Characterisation Study when considering development proposals.~~

Commented [NE159]: Removed to make more concise

5.87. There is a growing body of evidence indicating that people who live in greener neighbourhoods tend to have better cardiovascular health and lower levels of stress.[64] The greater the biodiversity in those green spaces, the larger the benefit to psychological well-being. Participating in activities such as gardening can have physical and mental health benefits. This policy works together with other Local Plan policies on green infrastructure.

Commented [NE160]: Respond to consultation – greater emphasis on health and wellbeing benefits in supporting text

~~5.85.~~5.88. Back gardens in perimeter block urban typologies, which have more or less enclosed rear gardens, are considered to be an integral part of the original design of these types of residential areas, provide valuable amenity space and an

[64] For example, the Create Streets Foundation has published research covering this topic.

ecological resource. We will therefore seek to resist proposals for development on garden land in these locations. Other typologies also often have dwellings with private back gardens that do not form such a strong design feature of the development. These are typically associated with more modern development, featuring small gardens that are rarely longer than 10 metres or are quite narrow, and are therefore not considered suitable for development.

~~5.86.~~5.89. Development p~~P~~roposals that ~~would~~ will result in the loss of garden land, including private back gardens, will be strongly resisted. This includes the development of back gardens for separate dwellings in perimeter forms of housing. The loss of garden land will ~~normally~~ only be considered acceptable in exceptional circumstances, where sites can be assembled to bring forward comprehensive redevelopment~~, in accordance with other Local Plan policies~~, and ~~where~~ appropriate re-provision of garden land is provided to mitigate losses as much as possible. ~~For all such proposals, development must be designed to provide an appropriate layout and built form that complements local character and protects amenity of neighbouring properties.~~

QD ~~12~~ 11 Shopfronts

A. Shopfronts (including their signs, canopies and security installations) must be designed to a high quality standard~~. They should respond positively to and enhance the character of Lewisham's neighbourhoods and contribute to the creation of lively and safe environments~~. Development proposals for shopfronts will only be supported where they do not adversely impact on local character, amenity and public safety.

B. Development proposals for new shopfronts or alterations to existing shopfronts ~~will be required to~~must:
   a. Retain, refurbish or reinstate shopfronts, or associated elements of architectural interest~~, particularly~~ where these ~~positively~~ contribute to the distinctive visual or historic character of a building, townscape or area;
   b. Be of a proportion, scale and quality that responds ~~positively~~ to the character of the host building and, where relevant, adjoining properties;
   c. Use high quality materials and colours that are sensitive to local character; and
   d. Retain or provide glazed shop windows~~; and~~.
   ~~e. Ensure inclusive and safe design.~~

C. ~~Development proposals for shopfront signage will only be supported where they contribute to a high quality townscape and do not adversely impact on local character, amenity and public safety.~~ Within Conservation Areas and residential areas, internally illuminated box fascia signs and projecting signs will not be permitted unless they successfully relate to the design and detailing of buildings and contribute positively to the distinctive character of a group of buildings or street.

D. Development proposals for open shopfronts without a stall riser and glazed screen will be resisted.

Commented [NE161]: Amended to make more concise – this point is captured in QD1 and criterion B below

Commented [NE162]: Respond to consultation – stronger policy wording

Commented [NE163]: Criterion H below amended, which covers this point

Commented [NE164]: Amended to make more concise – this is covered elsewhere in the policy and plan

E. Development proposals for shopfront canopies that are fixed in the 'down' position will be resisted. Retractable canopies may be acceptable where they are ~~appropriately~~ designed to provide sufficient clearance ~~and respond positively to local character~~.

F. Shopfront security features, including roller grilles and shutters, must not be visually intrusive, create blank frontages or detract from the character of the host building and townscape. Where such installations are considered necessary development proposals should seek to use internally located, open mesh security shutters and boxes.

G. Where proposals require a new shopfront as part of a mixed-use scheme, including re-provision of an existing unit, development will be expected to make provision for shopfront fit out.

H. Development proposals for shopfronts must apply inclusive and safe design principles. They should retain~~,~~ and wherever possible enhance~~,~~ street level ~~doors~~ access and entrances, including ~~that provide~~ access to upper floor residential, commercial and community uses.

Explanation

~~5.87.~~5.90. Lewisham's high streets and shopping areas, including their shopfronts, are an important and highly valued part of ~~the~~ our local neighbourhoods ~~in which they are located. They contribute to creating a sense of place and~~ and often reflect the unique character and historical development of the Borough~~, as set out in the Lewisham Characterisation Study (2019) and Lewisham's Conservation Area Appraisals~~. ~~Well-designed shopfronts, including those of architectural or historic interest, make an important contribution to local distinctiveness and the quality of the urban environment.~~

~~5.88.~~5.91. Development proposals should ~~seek to~~ ensure that shopfronts of good architectural quality or those with historic value are retained, refurbished or reinstated wherever possible. Where retention is not possible, replacements should ~~use~~ be designed to a high quality standard using materials ~~and incorporate designs~~ which are appropriate to the period and character of the building. ~~Particular c~~Consideration should be given to shopfront framework features including pilasters, brackets, fascias and projecting signs. This is especially important where development of a shopfront would impact on the significance of a heritage asset or its setting, for example~~. High quality designs will be needed for shops located~~, within a Conservation Area or ~~shopfronts that comprise~~ part of a Listed Building. Applicants are advised to refer the Council's Conservation Area Appraisals ~~for further information. Applicants are encouraged to refer the Council's latest~~and Shopfront Design Guide ~~Supplementary Planning Document~~SPD for further information.

~~5.89.~~5.92. ~~New~~ All shopfronts should be designed to a high quality standard, using materials and treatments that are sensitive to the character of the host building and neighbourhood. The standardisation in much of current shop design can

Commented [NE165]: Amended for clarity and to aid policy implementation

Commented [NE166]: The policy supporting text has been amended throughout to make more concise

gradually devalue the character and individual qualities of buildings in shopping areas. It is important that the design and materials of new and replaced shopfronts relate well to the scale of the building and its surrounds, as well as the original features of the building where these contribute positively to local character.

~~5.90.~~5.93. The design and quality of shopfronts can be maintained by referring to the architecture of the host building and high quality shopfronts in comparable neighbouring units, and by reflecting the general scale and pattern of shopfronts in the area. New shopfronts should contribute towards a cohesive streetscape, retain a consistent building line and contribute to the character ~~and attractiveness~~ of the centre or parade it is located in. The detailing, quality of materials, execution and finishes are very important in shopfront design, particularly as they are viewed close-up.

~~5.91.~~5.94. Contemporary shopfront designs will be supported in appropriate locations. All new and altered shopfronts should ~~be designed to be fully accessible for all~~apply inclusive and safe design principles. If a shopfront is replaced or altered, the design should respect the characteristics of the host building and, where appropriate, shopfront windows and framework features should be retained or restored.

~~5.92.~~5.95. Shopfronts with bulky and crudely attached, fully internal illuminated box fascias and intrusive signage add to visual clutter and detract from the quality and character of the townscape. Whilst ~~recognising~~ internally illuminated box fascia signs may be acceptable in some locations, their use should be avoided in residential areas where amenity can be adversely impacted, as well as locations that would result in harm to the street scene or significance of a heritage asset or its setting.

~~5.93.~~5.96. Shopfront security features should not have a detrimental impact on the townscape and local character. The use of solid external security shutters and grilles can create an unpleasant atmosphere when premises are closed, creating or perpetuating fears to personal safety. The use of open mesh security shutters and boxes is encouraged , ~~,~~ where such ~~interventions~~ measures are considered necessary. Security features should be designed so that they can be hidden behind the fascia in order to reduce visual clutter from the frontage and townscape.

~~5.94.~~5.97. Development proposals ~~Where~~ for mixed-use schemes ~~involve~~ involving the creation of a new shopfront , ~~development proposals will be required to~~must provide a reasonable shopfront fit out, having regard to viability. This ~~is particularly important to~~will encourage the occupation of business units and reduce the likelihood of vacancy, which can adversely impact on town centre vitality. ~~We will therefore seek an~~Proposals should therefore provide appropriate level of shopfront design detail ~~at the initial application stage, and to ensure high quality design sensitive to the surrounding context~~.

QD ~~13~~ 12 Outdoor advertisements, digital displays and hoardings

A. Outdoor advertisements, digital displays and hoardings should contribute to attractive and safe environments. Development proposals for these types of installations will be supported where they are designed to a high quality standard, appropriately sited, and adequately maintained throughout their operation to ensure:
   a. There is no adverse impact on local character, appearance or visual amenity on the site or surrounding area;
   b. Heritage assets and their setting and preserved or enhanced;
   c. They do not result in the unsightly proliferation or dominance of signage and displays in the vicinity of the site;
   d. There is no harm to public amenity, including by way of excessive illumination and visual intrusion of light pollution into adjoining or neighbouring properties and public spaces;
   e. There is no adverse impact on public or highway safety; and
   f. There is no harmful impact on trees, especially those with Tree Protection Orders (TPOs).

Explanation

Commented [NE167]: Policy supporting text amended throughout to make more concise

~~5.95.~~5.98. Outdoor advertisements, digital displays and hoardings are a means of providing information to the public and can play a complementary role in supporting the local economy. ~~However the physical quality of places, including streetscapes and townscapes, can be compromised by displays that are P~~poorly sited, designed and maintained installations can have an adverse impact on public health and safety, amenity and local character. We will seek to ensure that all such development is designed to a high quality standard ~~Displays can also have a harmful impact on local amenity, particularly where they are excessively bright and project light pollution onto neighbouring properties. As with all other types of development, we will seek to ensure that these sorts of installations respond positively to local character as well as contribute to~~ and secures safe, accessible and attractive environments.

~~5.96.~~5.99. Advertisements, digital displays and hoardings are regularly located on or adjacent to the public realm. ~~Particular care is needed T~~to ensure that everyone can move~~uninhibited movement along~~ safely and easily within it, development must apply inclusive and safe design principles~~the public realm by all users, including people with disabilities. It is also important that highway safety is maintained and development does not pose a risk to road users~~. Where installations are proposed to be located ~~Proposals for advertisements~~ on or adjacent to the Transport for London Road Network ~~will be required to consult Transport for London~~TfL should be consulted for an opinion on the ~~impact on the~~ safe operation of the highway network.

~~5.97.~~5.100. ~~Where poorly designed and sited, outdoor advertisements, digital displays and large hoardings can have an adverse impact on local amenity~~In the interests of protecting amenity proposals must address the impact that installations will have on surrounding uses and properties ~~and the quality of the~~

~~public realm~~. For example, ~~For example,~~ development should ~~they can~~not obscure the views of occupants inside buildings, obscure elevations which contribute to the appearance of the townscape~~public realm~~, or cause visual harm to parts of windows, cornices and other significant architectural features. ~~Careful consideration must therefore be given to impacts on the host building or structure, as well as the site and its local context.~~Proposals ~~should maximise opportunities~~ for hoardings should seek to add visual interest while they are in place, such as by incorporating public art.

~~5.98. Where hoardings are to be installed, they must be incorporated in a way that is sensitive to the local area. Proposals should maximise opportunities for hoardings to add visual interest while they are in place, such as by incorporating public art.~~

~~5.99.~~5.101. Applications for advertisements and hoardings are required to follow the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

6 Heritage

~~What you've told us~~

~~Heritage is important because:~~

- ~~It gives neighbourhoods their unique character and identity~~
- ~~Residents and visitors enjoy historic high streets~~

~~Concerns the historic environment is being damaged by:~~

- ~~Demolitions and new developments~~
- ~~Small works such as house extensions~~
- ~~Building on back gardens~~

~~More should be done to improve the historic environment by:~~

- ~~Supporting heritage projects~~
- ~~Better preserving the special qualities of places outside of Conservation Areas~~

~~What we've learned~~

~~Lewisham has a rich historic environment~~

- ~~It features 29 conservation areas, 364 nationally listed buildings and structures, 301 locally listed buildings, 1 scheduled ancient monument and 2 registered gardens and parks.~~
- ~~Part of the buffer zone for the UNESCO Maritime Greenwich World Heritage Site is located at Blackheath.~~
- ~~Lewisham has a unique maritime and industrial heritage, and was once home to the Royal Naval Dockyard.~~

~~Heritage at risk~~

- ~~There are buildings and other assets on the 'Heritage at Risk' register due to neglect, decay or other threats.~~

~~Main Issues~~

~~Understanding heritage~~

~~Our heritage assets are irreplaceable. Their value must be understood if they are to be preserved for future generations.~~

~~Enabling growth, preserving heritage~~

~~There is greater pressure to redevelop land and buildings to meet needs for homes and jobs. Lewisham's growth must be managed in a way that is sensitive to and preserves local heritage.~~

~~Heritage at risk~~

~~The heritage value of some buildings (and other assets) could be lost if action is not taken to secure their long-term future.~~

~~We're proposing to…~~

~~Preserve and enhance the historic environment~~

- ~~Ensure developments respect the value of heritage assets and their setting – this includes buildings, townscapes and landscapes.~~
- ~~Require developers to submit a 'Heritage Statement'~~

~~Promote local heritage~~

- ~~Work with our partners to put heritage at the heart of regeneration projects.~~
- ~~Identify 'Areas of Special Local Character' to preserve the special qualities of neighbourhoods outside of conservation areas.~~

~~Prevent the loss of heritage assets~~

- ~~Allow for 'enabling development' in exceptional cases. Meaning we may permit some harm to the heritage value of a building (or other asset) to secure its long term future, but only where there is public benefit in doing so.~~

~~<Did you know?>~~

~~Lewisham is gaining recognition for its award winning heritage projects. Recent examples include the restoration of the Fellowship Inn, in Bellingham, and improvements to Beckenham Place Park.~~

Commented [NE168]: Not required for Regulation 19 plan

HE 1 Lewisham's historic environment

A. The Council will seek to preserve or enhance the value and significance of Lewisham's historic environment and its setting by:
   a. Collaborating with stakeholders to identify, assess, monitor and review heritage assets and understand their importance to both the Borough and the nation;
   b. Celebrating Lewisham's historic environment and ensuring that it is central to reinforcing sense of place and place making;
   c. Ensuring the significance of the Borough's heritage assets is fully understood, positively valued and that their contribution to sustainable neighbourhoods and communities is recognised, including by preparing a Heritage Strategy;

d. Requiring that heritage meaningfully informs the design of development proposals, and only supporting development that preserves or enhances the significance of heritage assets and their setting;
e. Promoting heritage-led regeneration and urban renewal ~~where this ensures that new development~~as a means to retain~~s~~, reveal~~s~~ or reinstate~~s~~ significant aspects of the Borough's historic environment;
f. Requiring development proposals to demonstrate that all reasonable measures have been investigated to avoid harm to heritage assets; and
g. Using planning powers available to appropriately manage new development in sensitive places and to remedy harmful unauthorised works.

B. All development proposals in the historic environment should assess whether the site, building or structure is - or could be - identified as a heritage asset. The Council will consider the significance of the asset and the impact of the proposals on its special interest. Any harm should be clearly and convincingly justified, and will be weighed against the public benefit of the proposal.

C. Proposals for works that could impact on a heritage asset are required to be accompanied by a Heritage Statement. This should be compiled with reference to relevant and available sources of historic environment information, including Conservation Area Appraisals, and:
   a. Explain the significance of the asset and its setting;
   b. Set out how the asset has informed the design of the proposal; and
   c. Assess the impact of the proposal on the asset.

D. Where a development proposal conflicts with the Development Plan but will secure the preservation of a heritage asset that is otherwise not financially viable to repair, the Council will assess whether the benefits of the proposal outweigh the disbenefits of departing from those policies.

Commented [NE169]: Respond to consultation – standalone Policy HE 4 on 'enabling development' deleted on request of Historic England, however officers consider there is merit in retaining a criterion for this matter to ensure all such proposals considered in line with HE's standing guidance (as set out below in supporting text). The criterion is included here.

Explanation

6.1. Lewisham has an extremely rich and varied historic environment. It encompasses landscapes, water bodies, parks and open spaces, buildings, urban spaces and the features within them, along with archaeological remains both buried and above ground. The historic environment encapsulates the social and cultural history of Lewisham, its communities and people. This is reflected in the physical fabric of places, the values that people ascribe to them and the traditions and memories associated with them. Their value may be historic, architectural or artistic, social and communal.

6.2. We are committed to ensuring that the full extent of the significance of heritage assets is understood, both by development industry stakeholders and the wider public, and to properly recognise and protect this significance. This is vital to the successful delivery of the spatial strategy for the Borough. As Lewisham's places evolve over time it is imperative that our irreplaceable heritage assets are appropriately preserved and the distinctive characteristics that make them special are retained and revealed.

6.3. In planning policy terms the Borough's heritage assets comprise of statutorily designated assets and non-designated assets, both of which make important contributions to the communities within which they are situated. ~~We have a key interest in ensuring~~The Local Plan seeks to ensure that these assets are preserved or enhanced over the long-term. As well as recognising the value of these assets in their own right, their conservation will support the vitality and local distinctiveness of places across the Borough, and to help instil and reinforce a sense of place amongst residents and visitors.

6.4. Conservation is an active and continual process of maintenance and managing change based on a thorough understanding of what is special about a place. It requires a multi-agency approach to deliver beneficial outcomes. Our expectation is that key stakeholders including community and special interest groups~~, key stakeholders~~ and the development industry will all positively engage in the conservation process. Collaboration is necessary to deliver our growth and regeneration objectives whilst also ensuring Lewisham's historic environment can continue to be celebrated and enjoyed, both by current and future generations.

Commented [NE170]: Respond to consultation – clarification to reflect that community and special interest groups are indeed key stakeholders

6.5. All development proposals should be based on a full understanding of the significance of heritage assets within the site and surrounding area. This should be established by reference to relevant and available sources of historic environment information. This includes the Greater London Historic Environment Record, the Council's planning and conservation webpages and Lewisham's Local History Archives. Applicants should consult good practice guidance to assist in assessing various levels of significance, such as that produced by Historic England. We will expect all development proposals to identify and respond positively to those elements that are of high, moderate and low historic significance and those elements that detract from the significance.

6.6. All development proposals that are likely to have an impact on a heritage asset or its setting must be accompanied by a Heritage Statement. The statement should clearly explain the significance of the asset and its setting, set out how this has guided the design of the proposal, and assess how the proposal impacts upon it. Applicants will be expected to demonstrate how these findings have meaningfully informed the design of the proposal. The quality, accuracy and comprehensiveness of the heritage statement will be considered in the determination of planning applications.

Commented [NE171]: Included to aid implementation of the policy

6.7. Not all heritage assets are currently known, documented or fully understood. Buildings, structures or sites may be identified as non-designated heritage assets through the development process. For example, new information may be revealed by local groups through the consultation process or during preliminary site investigations undertaken by an applicant. In these circumstances we may seek amendments to proposals to ensure that the significance of an asset is appropriately preserved or enhanced.

6.8. 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.

6.9. Proposals that may cause harm to the significance of heritage assets should be clearly and convincingly justified through the information provided in the Heritage Statement. Where the loss or harm to a heritage asset is suitably justified and planning consent is granted, a programme of building recording of a level appropriate to the significance of the building and the extent of loss may be required. Such measures will help to mitigate impacts of development and will normally be sought by way of a planning condition.

6.10. Where there is evidence of deliberate neglect or damage to a heritage asset, the current condition of the asset will not be taken into account in planning decisions.

6.11. We strongly advise applicants to seek the advice of specialist historic environment consultants at an early stage of the design process. This will help to ensure that the significance of heritage assets likely to be affected is appropriately identified. Applicants will then be better placed to consider options for bespoke and sensitive, heritage-led design solutions that respond to this significance. Specialist consultants can also advise on and provide the necessary information to support an application.

6.12. To support conservation objectives through the development management process the Council may use powers available to it. This includes the use of Article 4 Directions to remove permitted development rights, along with the use of Section 215 notices, Urgent Works or repair notices where this would help achieve conservation objectives. The use of such powers may be appropriate where there is a risk to historic fabric or the appearance of an area. There are Article 4 Directions in place for many of the Borough's Conservation Areas, and we will investigate the scope for introducing these elsewhere.

6.13. Historic England maintains a Heritage at Risk register to assist in the monitoring and management of Listed Buildings and conservation areas that are at risk of losing their special interest. The Council has statutory authority to intervene when there is evidence of serious neglect, including Urgent Works Notices to secure works to vacant listed buildings or unlisted buildings in conservation areas and has powers of inspection.

6.14. The NPPF sets out policies for 'enabling development'. This is a term specifically used for cases where the cost of repair - and conversion to optimum viable use, if appropriate - of a heritage asset exceeds its market value on completion of repair or conversion, allowing for appropriate development costs (termed a 'conservation deficit)'. In these cases development proposals which depart from

the Development Plan and would normally be considered unacceptable may be permitted in order to secure the conservation of the asset.

6.15. Enabling development should not harm the heritage asset it is intended to conserve. The Council will expect that measures have been fully explored and undertaken prior to considering enabling development. This may include maintenance, repair and decay-prevention measures, grant-funding for repairs and reuse, transfer of ownership to a building preservation trust or similar charity, and other sympathetic measures. Development proposals for enabling development must submit full financial viability details and will be assessed having regard to the criteria set out in Historic England's advice note GPA4 Enabling Development and Heritage Assets (2020).

Commented [NE172]: Additional supporting text to make clear how the Council will consider applications for enabling development – see amend to criterion D above

Figure 6.1: Conservation Areas and World Heritage Site Buffer Zone

HE 2 Designated heritage assets

Maritime Greenwich World Heritage Site Buffer Zone

A. Development proposals affecting the Maritime Greenwich World Heritage Site Buffer Zone must protect and preserve the significance, integrity and authenticity of ~~its~~ the Site's 'Outstanding Universal Value', ~~as well as~~including its setting and the views to and from it. All proposals will be considered having regard to the Maritime Greenwich World Heritage Site Management Plan and the official UNESCO Statement of Outstanding Universal Value.

Conservation Areas

B. Within Conservation Areas development proposals ~~for new development~~ (including alterations and extensions to existing buildings) will only be supported where they:
    a. Preserve or enhance the special character and appearance of the Conservation Area having particular regard to:
        i. Townscape, buildings, rooflines and the relationships between buildings;
        ii. Plot coverage and open spaces, including gardens;
        iii. Scale, form, elevational hierarchy, fenestration pattern, ornamentation and materials;
        iv. Trees, topography, boundaries and other landscape features; and
        v. Views, from the public and private realm, including streetscape views and views across rear gardens and public open spaces;
    b. Do not result in an adverse ~~cumulative~~ impact on the special characteristics of a Conservation Area, ~~even~~ taking into account if the development in isolation would ~~cause~~ lead to less than substantial harm but cumulatively would adversely affect the character and appearance of the Conservation Area.

C. Development p~~P~~roposals ~~involving~~ for the retention, refurbishment and reinstatement of features that are important to the significance of a Conservation Area will be supported. The Council will require the retention of architectural and landscaping

features, such as front gardens and boundary walls, important to an area's character or appearance, if necessary, by the use of Article 4 Directions.

Commented [NE173]: Respond to consultation – policy wording strengthened

D. Proposals for the redevelopment of sites, buildings and structures that detract from the special characteristics of a Conservation Area will only be supported where they will complement and positively impact on the character and significance of the area.

E. Development proposals involving t~~T~~he demolition of buildings or structures that make a positive contribution to the character or appearance of a C~~c~~onservation A~~a~~rea will be resisted.

~~E.~~F. Development proposals for bin sheds and bike stores should be located at the side or rear of properties with a front access to the side and rear exists.

Commented [NE174]: Respond to consultation – retain from adopted DM local plan

~~F.~~G. Development proposals on sites adjacent to a Conservation Area must not have a negative impact on the setting or significance of the Conservation Area.

Listed Buildings

~~G.~~H. Development proposals that would result in substantial harm to (or total loss of the significance of) a Listed Building and its setting will be strongly resisted, in line with the NPPF.

~~H.~~I. Development p~~P~~roposals involving Listed Buildings (including alterations, extensions, refurbishment and repairs) will only be supported where:

a. They relate sensitively to the building, and preserve or enhance its significance;
b. The setting of Listed Building is preserved or enhanced to better reveal the significance of the asset;
c. Important views, both of and from, the Listed Building are protected; and
d. Less than substantial harm to the Listed Building is avoided, or where this is not possible, then any harm is clearly and convincingly justified, and demonstrated to be outweighed by public benefit, in accordance with the NPPF.

~~I.~~J. Development proposals within the curtilage of a Listed Building should be sensitively designed and provide an appropriate site-specific response to :

a. Preserve the integrity of the relationship between the Listed Building and its site and setting;
b. Ensure there is no adverse impact on the future viability of the Listed Building.

Scheduled Ancient Monuments

~~J.~~K. Proposals for development or work that is expected to affect a Scheduled Ancient Monument will be assessed in in consultation with Historic England and applications for planning permission should be submitted in parallel with applications for Scheduled Monument Consent.

~~K.~~L. Archaeological investigation will be expected to be undertaken prior to the submission of an application. The results of this investigation should demonstrably inform the proposed development or works. Where consent is granted, conditions may be used to secure further detailed investigations and appropriate mitigation works, along with a programme of recording, interpretation and dissemination of evidence found during the investigations. Development will be expected to preserve significant archaeological remains in situ.

~~L.~~M. Development p~~P~~roposals that would result in harm to the significance of a monument or its setting will be required to provide clear and convincing justification, and demonstrate that the harm is outweighed by public benefit, in accordance with the NPPF.

Registered Parks and Gardens and London Squares

~~M.~~N. Development proposals will be expected to safeguard the features which form part of the special character or appearance of a Registered Park, Garden or Square. They should also ensure development does not detract from the layout, design, character, appearance and setting of the asset, or harm key views into and out of the space.

Explanation

Maritime Greenwich World Heritage Site Buffer Zone

~~6.13.~~6.16. World Heritage Sites are designated heritage assets of the highest order. The UNESCO declared Maritime Greenwich World Heritage Site is located adjacent to the northeast boundary of Lewisham. Its 'Buffer Zone' stretches into the Borough covering a part of Blackheath, as shown on the Policies Map.

~~6.14.~~6.17. As stated in the Maritime Greenwich World Heritage Site Management Plan (2014), a Buffer Zone is an area surrounding a World Heritage Site which has complementary legal and/or customary restrictions placed on its use and development to give an added layer of protection to the site. This should include the immediate setting of the site, important views and other areas or attributes that are functionally important as a support to the site and its protection. This includes continuation of the Grand Axis from the World Heritage site to All Saints Blackheath Church and the openness of the heath, which the Local Plan broadly seeks to maintain and enhance. Blackheath's open character, and drama of approach, both support the Outstanding Universal Value of the Maritime Greenwich World Heritage Site and its designation as a Conservation Area. 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.

Commented [NE175]: Additional information to aid policy implementation.

Conservation Areas

~~6.15.~~6.18. Conservation Areas play an important role in shaping local urban character and identity. The Council has a statutory duty to preserve the character of Conservation Areas under Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990. Conservation Area designation should not preclude appropriately located and sensitively designed development from coming forward. Indeed, the emphasis on Conservation Area management is to ensure that new development positively contributes to the area in which it is situated.

~~6.16.~~6.19. Lewisham's Conservation Areas are areas of high townscape value that hold particular significance in the story of the Borough's historic development and which underpin its distinctive local character. Applicants are strongly advised to refer the Council's Conservation Area Appraisals early in the planning and design stage. The appraisals should be the starting point for understanding the significance of a site, building, structure or other feature and the contribution it makes to the surrounding area. We will continue a rolling programme of producing and updating character appraisals for each of the Borough's Conservation Areas.

~~6.17.~~6.20. The character of a Conservation Area can depend heavily on the cohesiveness of form, consistency of materials and detailing of buildings. The alteration or loss of one individual feature to a building may appear minor in the wider context, but incrementally such small changes can erode the special interest of an area. We have made Article 4 Directions to a number of Conservation Areas to help prevent the loss of important and distinctive features, and will continue to do this where it is considered necessary.

~~6.18.~~6.21. We strongly encourage the reinstatement of original or other features that make a positive contribution to a Conservation Area. Such works can help to enhance or better reveal the area's significance. This includes the reinstatement or repair of features such as front boundary walls and fences, front garden soft landscaping and missing architectural detailing.

~~6.19.~~6.22. Not all elements of a Conservation Area contribute to its significance. Some buildings or features can have a negative or neutral impact. The adaptive re-use of redundant buildings and new infill development on disused land or under-utilised sites can represent an opportunity for enhancement. We will therefore support in principle such redevelopment where this will positively impact on and improve local character.

Listed Buildings

~~6.20.~~6.23. The Council has a duty to preserve the character of Listed Buildings under Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990. We will seek to ensure that the significance of a Listed Building is not harmed

through inappropriate development to it, to structures or features in its curtilage, or by new development in its setting. Proposals will need to be informed by an understanding the significance of a Listed Building and its wider setting, irrespective of whether works are proposed to the Listed Building itself. Planning permission and/or listed building consent will only be granted where the relevant requirements are satisfied.

~~6.21.~~6.24. The best way of securing the upkeep of historic buildings and areas is to keep them in active use. It is recognised that buildings and structures will often necessitate some degree of adaptation. The range and acceptability of proposed uses must therefore be a major consideration, particularly where Listed Buildings are concerned. The conversion of Listed Buildings to new or different uses can result in harmful impacts to the building's significance. This is due to works to the historic fabric (for instance related to the insertion of new service routes, vents and ducts) or plan form (for instance subdividing floor spaces to create additional units).

~~6.22.~~6.25. We will seek to ensure that extensions and other works or alterations to Listed Buildings are restricted to the less significant parts of the building. Proposals will be required to provide full details of the development or associated works. This is in order that the impacts can be appropriately assessed. This must include details of any ancillary works of servicing, extraction, fire separation, access, and sound and thermal insulation. In many cases non-standard approaches and materials will be necessary to respond sensitively to the historic building fabric and form. The cumulative impact of works that, in isolation, may cause only minor harm will also be considered.

~~6.23.~~6.26. Where development in the curtilage of a Listed Building is justified by the applicant as necessary to ensure its future viability or repair, and/or is classed as enabling development, full financial viability details will be required to be submitted.

Scheduled Ancient Monuments

~~6.24.~~6.27. The effect of a proposal on the archaeological value or special interest of a scheduled ancient monument is a material consideration in determining a planning application.

~~6.25.~~6.28. The best way to avoid loss of significance of buried archaeological remains is to preserve them in situ. Where this cannot be done, provision for excavation and recording will be required to be undertaken prior to development, or required by condition during development.

~~6.26.~~6.29. Lewisham has one Scheduled Ancient Monument, the Tudor Naval Storehouse in the former Royal Naval Shipyard, Deptford, now known as Convoys Wharf. Following investigations in the 20th century, the archaeological interest of the Dockyard and adjacent Sayes Court Manor site as a whole was recognised by the Secretary of State to be of equivalent significance to a

scheduled monument, and therefore the whole site should be considered subject to the policies for designated heritage assets, as required by NPPF footnote 63.

Registered Parks and Gardens and London Squares

~~6.27.~~6.30. The inclusion of a site on the Register of Parks and Gardens or listed as a London Square is a material consideration in determining a planning application. The significance of the site includes the contribution made by boundary walls, buildings and features within it, as well as historic landscaping schemes and planting. Social, cultural and artistic values are likely to be important alongside historic and architectural values. London Squares will be designated on the Policies Map.

Figure 6.2: Non-designated Heritage Assets

HE 3 Non-designated heritage assets

Locally listed buildings and other non-designated assets

A. Development proposals will only be supported where they preserve or enhance the significance of a locally listed building or other non-designated heritage asset, and the asset's setting. In particular, proposals for the sensitive retention, refurbishment and appropriate re-use of non-designated assets will be considered favourably.

B. Proposals that unjustifiably harm the significance of a non-designated heritage asset and its setting will be ~~strongly resisted~~refused.

C. Non-designated heritage assets may be identified during the development management process, in line with Policy HE1 (Lewisham's historic environment).

Areas of Special Local Character

D. Within Areas of Special Local Character development proposals ~~will be expected to~~must:
   a. Preserve the characteristics that contribute to the area's significance, which may include the spatial, architectural, townscape, landscape or archaeological distinctiveness;
   b. Secure the retention of unlisted buildings where these contribute positively to the local distinctiveness of the area; and
   c. Ensure development in its setting preserves the area's special local character.

Archaeology

E. Development p~~P~~roposals affecting archaeological interests will be assessed having regard to the impact on the significance of the archaeological asset and its setting. Development proposals should refer to the Greater London Historic Environment Record (GLHER) to assess the likelihood of archaeological deposits being present

on a site. Known areas with high likelihood of archaeological deposits are identified as Archaeological Priority Areas (APAs).

F. In order to ensure assets are appropriately identified and managed the Council will:
   a. Require the necessary level of assessment, investigation and recording, in consultation with the Greater London Archaeological Advisory Service (GLAAS) for development proposals that affect, or have the potential to affect Lewisham's archaeological heritage; and
   b. Expect applicants to have sought pre-application advice from GLAAS before designing a programme of archaeological investigation. .

G. Development p~~P~~roposals ~~on sites that lie within or adjacent to an APA~~that have the potential to affect archaeological interests must be accompanied by an A~~a~~rchaeological ~~assessment~~Statement, which should be submitted as part of the Heritage Statement and refer to any relevant information in the GLHER. ~~. The assessment will be expected to identify and describe the significance of the archaeological interest of the site, including any contribution made by the archaeological setting of the site, and describe the impact of the proposed development on the archaeological resource.~~ With the advice of GLAAS, the Council ~~Where it is established~~may require ~~that~~ a further site specific survey and/or intervention. ~~is necessary, proposals will be expected to submit~~This is likely to take the form of a Written Scheme of Investigation which ensures adequate arrangements for:
   a. Investigation, recording, and archiving of assets of archaeological importance, whether of national or local importance;
   b. Seeking opportunities to integrate archaeological evidence into the development, including through design and interpretation material; and
   c. Public engagement, including dissemination of the findings to further understanding of the historic environment.

Commented [NE176]: Repetition – addressed in E and F above

~~H. Subterranean development outside the Borough's Archaeological Priority Areas must consider the potential for discovery of archaeological evidence. The site should be checked against the GLHER for archaeological potential, and this information should be submitted in a Planning Statement. Requirements for further investigation will be secured by condition where necessary.~~

Commented [NE177]: Repetition – covered in the Policy E-G above

~~I.~~H. Priority should be given to the preservation and management of an archaeological asset and its setting in situ, commensurate with the significance of the asset. If this is not possible, sites should be excavated, deposits removed a report produced, significant finds archived and the results disseminated, as required by condition.

~~J.~~I. Where remains unexpectedly come to light, the Council will seek to ensure their preservation or recording in consultation with the applicant and/or developer.

Explanation

~~6.28.~~6.31. Non-designated heritage assets include Locally Listed buildings and structures, Areas of Special Local Character, Archaeological deposits, including

known areas of high archaeological interest known as Archaeological Priority Areas (APAs), buildings structures and features within conservation areas that are identified to make a positive contribution, unlisted historic street furniture, local parks and gardens of historic interest (which are not Registered), historic townscapes and buildings of townscape merit.

~~6.29.~~6.32. Lewisham contains many buildings and structures that are not statutorily listed but are nonetheless of special historic, architectural, townscape, social or cultural interest in their local area, and greatly contribute to the Borough's distinctiveness and sense of place. The Council has a rolling programme of evaluating and recognising their importance and value, through periodic reviews and updates of the Local List.

~~6.30.~~6.33. Areas of Special Local Character are places where there is a coherent local character, often based on townscape, architecture and spatial qualities. Their significance will normally rest on the combined qualities of groups of elements~~Individual buildings within the area will usually be of interest in the way that they contribute to the whole,~~ rather than ~~for their own individual features~~ the value of the elements taken individually. Twelve Areas of Special Local Character are currently recognised, as set out in Schedule 3, having been identified in previously adopted documents. These areas will~~, from time to time,~~ be assessed against Historic England's guidance for conservation area designation and, if they are of sufficient historic or architectural interest, will be consulted upon and adopted as Conservation Areas. If they do not meet the level of interest expected for C~~c~~onservation A~~a~~rea designation but still demonstrate other aspects of local interest (for instance artistic, landscape, social and cultural) they will ~~nonetheless~~ continue to be considered of special interest to the Borough and will ~~remain~~ be ~~identified~~ formalised as Areas of Special Local Character. Selection criteria for assessing potential new Areas of Special Local Character will be adopted by the Council in due course, and any proposed new areas will then be assessed against them.

Commented [NE178]: Respond to consultation – following request for new areas of special local character to be designated, this sets out information about ASLC and the approach to any future designations

Identifying heritage assets.

~~6.31.~~6.34. In line with Policy HE1 (Lewisham's historic environment), the Council will continue to seek to identify new heritage assets to broaden public understanding and appreciation of the historic environment. Non-designated assets may be identified through Borough-wide reviews, through nomination by members of the community or by the Council when assessing planning applications. The Council's approach to all newly identified assets is:

1. To identify the nature and extent of the asset;
2. To assess its architectural, historic and archaeological significance against adopted criteria for e.g. Conservation Areas, Areas of Special Local Character, Locally Listed Buildings~~-~~; and

3. If it meets the adopted criteria, undertake public consultation on the proposal to designate as a Conservation Area, identify as an Area of Special Local Character, or~~to~~ add it to the Local List, as appropriate.

~~6.32.~~6.35. The Council maintains a 'live' list of non-designated heritage assets that have been identified but have not yet been assessed and these are reviewed and updated from time to time.

Archaeology

~~6.33.~~6.36. ~~An Archaeological Priority Area (APA) is a defined area where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries. In London, APA boundaries are drawn by GLAAS and based on evidence held in the Greater London Historic Environment Record.~~ Lewisham is particularly rich in known areas of archaeological interest, dating to the prehistoric, Roman and medieval periods. The areas of greatest known archaeological interest or where there is above average potential for new discoveries are identified by Archaeological Priority Areas (APAs). Lewisham's APA boundaries date from the 1970s-1980s and do not predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future, as required by NPPF. They will be reviewed and updated in due course by Historic England and a London-wide standardised approach, as defined within London Plan paragraph 7.1.10 will be used which assigns all land in the borough to one of four tiers denoting different levels of sensitivity to development, using an 'archaeological risk' model. Therefore developers should consider the potential for archaeological discoveries both within and outside the existing APA boundaries.

Commented [NE179]: Respond to consultation – factual updates including on the AAP review process for Lewisham

~~6.34.~~6.37. Development should avoid harm to or loss of archaeological deposits of significance and any harm will require justification. Developments that have the potential to affect archaeological interests include subterranean development and some alterations to historic buildings. Archaeological remains of local importance should be preserved in situ unless the public benefits of the development outweigh the loss of the remains. Where it is suitably demonstrated that archaeological remains cannot be preserved in situ the Council will require that the remains are appropriately excavated, recorded, archived, published, interpreted and displayed through a detailed planned programme of works. There may also be a requirement for a programme of public engagement in order that the results of significant archaeological discoveries are disseminated. The scale of public engagement will be based upon on the significance and interest of what is found, and may involve site visits for the public or other means of on-site and off-site viewing.

~~HE 4 Enabling development~~

~~A. Proposals for enabling development that secure the future of a heritage asset, but would otherwise conflict with planning policies, will only be supported where it can be suitably demonstrated that the development:~~

~~a. Will not materially harm the heritage values of the asset or its setting;~~

b. Avoids detrimental fragmentation of management of the asset;
c. Will secure the long-term future of the asset and, where applicable, its continued use for a sympathetic purpose;
d. Is necessary to resolve problems arising from the inherent needs of the asset, rather than the circumstances of the present owner, or the purchase price paid;
e. Is not otherwise viable owing to insufficient subsidy is not available from any other source; and
f. Is the minimum necessary to secure the future of the asset, and that its form minimises harm to other public interests.

B. In addition to meeting the criteria of (A) above, proposals will only be acceptable where it is demonstrated that the public benefit of securing the future of the significance of the asset through such enabling development decisively outweighs the disbenefits of departing from planning policies.

Explanation

6.35. We are committed to ensuring all reasonable steps have been taken to secure the future of heritage assets without compromising their significance. All development will be expected to avoid harm to or loss of heritage assets. Careful consideration should therefore be given to conservation objectives at the earliest stages in the planning and design process. The Council will seek to work with applicants to identify appropriate means of delivering development that avoids or mitigates harm, including through pre-application discussions. Understanding the significance of the site, designing new interventions that leave the most significant spaces unaltered, and concentrating new work in areas of lesser significance is more likely to achieve a successful scheme. New works may also be required by Building Regulations and therefore seeking early advice from both Planning and Building Control is advisable to ensure that a sensitive solution can be found.

6.36. The NPPF provides that 'enabling development' may be justifiable in certain circumstances. Whilst the Council will work proactively to help ensure that the conservation value of its heritage assets is not diminished, it also accepts that there may come a point where enabling development is the only viable means of securing their long term future. Proposals for enabling development must be supported by evidence demonstrating that development is the optimum viable use (i.e. the use that is likely to cause the least harm to the significance of an asset) in line with national planning guidance.

6.37. We will use the Historic England standing guidance, "Enabling Development and the Conservation of Significant Places" (2012), in the consideration of development proposals and supporting evidence. Applicants are strongly advised to have regard to this guidance when considering proposals.

6.38. Where harm to an asset or its setting is proposed on the grounds that repair on its own is not economically viable, applicants must submit justification setting out:

1. A valuation of the existing site;
2. A full survey identifying the repairs required;
3. Development costs including a costed schedule of repairs;
4. An estimate of the value of the repaired property, including potential yields;
5. Evidence that alternative sources of funding for repairs are not available; and
6. Evidence that the property has been marketed for a reasonable period at a price reflecting its condition.

Commented [NE180]: Respond to consultation – standalone policy on enabling development deleted at request of Historic England. Enabling development is by definition contrary to policy, and only used in exceptional circumstances. However, officers consider there is a merit in retaining a policy point to ensure clarify on expectations for its applications, which has been incorporated into HE1.

7 Housing

What you've told us

Housing costs are a concern because:

- They are too high
- There are not enough affordable homes
- Developers say financial viability is important when deciding the amount of affordable homes built on a site

More and better quality housing must be provided for specific groups, including:

- Homeless people and other vulnerable groups
- Students
- Families with children

New housing development must be carefully managed to ensure:

- There are enough services and community facilities to cope with extra demands
- There is no harm to local character and the environment
- Suitable controls over houses in multiple occupation (HMOs)

What we've learned

Good track record of delivery

- The Council has regularly x met its housing targets over the past decade.

Housing costs are rising quickly

- Average house prices in Lewisham are more than 10 times the average workplace earnings
- In 2018, the median household income was under £29,000, the 3rd lowest in London
- Social rented homes are the only housing that remains genuinely affordable for the majority of people in Lewisham

Private rented sector is growing

- 1 in 4 residents in Lewisham live in the private rented sector – double that of 15 years ago.
- Private rents rose by more than 50% between 2011 and 2017.

Housing mix and quality

- Most new private housing built is with 1 and 2 bedrooms.

- In September 2019, almost 5,100 families on the housing register were living in an overcrowded home and in need of a larger one.
- There has not been a large rise in HMOs, but the x location of HMOs has shifted to the south of the Borough, with large clusters in Bellingham, Downham and Whitefoot.
- Most social housing units meet the Decent Homes standard. Our research shows private sector housing is not achieving the same level of standards

Viability

- Our research shows that small housing schemes (less than 10 units) could make a contribution to affordable housing.

Main Issues

Affordability

The gap between earnings and housing costs is quickly widening.

A growing population

Many more homes are needed for our growing population. The draft London Plan sets a new housing target for Lewisham of 1,667 net units a year, and the Government's target is much higher. Growth on this scale will have to be properly managed.

Different housing needs

Lewisham's diverse population has many different housing needs that must be catered for.

Design Quality

The standard of accommodation varies across Lewisham. Measures are needed to ensure everyone has access to a decent and secure home.

HMOs

HMOs are part of the housing mix that helps to meet local need. This type of development must be carefully managed to ensure housing units are fit for purpose, and to protect the amenity of neighbourhoods.

Overcrowding

There are a large number of families on the housing register in need of a larger home.

We're proposing to...

Secure more genuinely affordable homes

- Set a target of 50% of all new homes built to be genuinely affordable (based on local income levels). In Lewisham, this is social rent or 'London affordable rent'.
- Maximise affordable housing on new schemes, including small developments (less than 10 units)

Boost housing delivery

- Meet and exceed the London Plan housing target - by delivering most new homes on large sites we have identified, and elsewhere through the sensitive intensification of neighbourhoods
- Protect against the loss of housing, including social housing
- Use powers available to bring vacant homes back into use

Tailor housing to local communities

- This includes older people, students and those who require specialist support.
- Protect family homes and seek that family units are built in new housing schemes.
- Improve controls over HMOs
- Ensure affordable housing is built to a high quality standard with equal access to amenities, such as play space, regardless of tenure.

We've also considered

- Using the standard definition of affordable housing (which does not account for local income levels).
- Whether affordable housing contributions from small schemes impacts on their financial viability.
- Allowing conversions of family homes into flats, with no requirement to retain a family-sized unit.

Commented [NE181]: Not required for Regulation 19 plan

HO 1 Meeting Lewisham's housing needs

Lewisham's strategic housing target

A. The Council will work positively and proactively with key stakeholders, and including development industry partners, to facilitate a significant increase in the delivery of new homes to help meet Lewisham's housing needs. Development proposals must make the best use of land and optimise the capacity of housing sites in order to ensure:
    a. The draft London Plan minimum ten-year target for the Boroughis exceeded through the delivery of at least 16,670 net housing completions over the periodduring 2019/2020 to 2028/20303029 (equivalent toor 1,667 net completions per yearp.a.) is met and exceeded; and
    b. That delivery against Lewisham's Local Housing Need figure is maximised.
    b. The NPPF 15-year target is exceeded through the delivery of at least 2755,730 net housing completions over the 15-year period from the anticipated start date of the local plan, 20230/20241 to 20374/20385 (equivalent toor 1,667 net completions per year plus additional completions during the first five years to cater for the current backlog (461 p.a.) and the application of a 5% buffer (83 p.a.)).

Commented [NE182]: Respond to public consultation – removed following the publication (adoption) of the London Plan (2021), which sets the Borough's strategic housing requirement.

B. The Council will keep under review the Local Plan's strategic housing target and performance against the delivery of this. Where changes to the London Plan policies are made, including the strategic borough-level housing targets are made, the local plan review process will be used to ensure Lewisham's lLocal policies Plan remains in general conformity with the London Plan.

Increasing housing supply

C. A carefully managed uplift in the delivery of new housing development across the Borough, with priority given to genuinely affordable housing, will be achieved by:

a. Directing new ~~residential~~ housing development to Opportunity Areas, Growth Nodes, Regeneration Nodes, ~~strategic~~ Growth ~~c~~Corridors, town centres and other well-connected and sustainable locations, consistent with the spatial strategy for the Borough~~, in line with~~ set out in Policy OL1 (Delivering an Open Lewisham);

b. Allocating strategic sites for new housing ~~development~~, including mixed-use development, and supporting development proposals where they comply with the site allocation requirements and resisting proposals that are at odds with these;

c. Facilitating the sensitive intensification of established residential areas~~,~~ and supporting the development of small sites for housing, in line with Policy HO2 (Optimising the use of small sites);

d. Undertaking a programme of housing estate maintenance, renewal and regeneration that ensures high quality housing provision, results in no net loss of affordable housing and delivers ~~an uplift~~net gains in affordable housing wherever possible;

e. Ensuring that all development proposals make the best use of land and optimise the capacity of housing sites, in line with Policy QD6 (Optimising site capacity);

f. Making the best use of the existing housing stock, including by using available tools to bring vacant units back into use and to regulate the use of homes for short-stay visitor accommodation; ~~and~~

g. ~~Strongly resisting~~Refusing development proposals that ~~would~~ will result in the net loss of housing unless:

   i. It is suitably replaced at existing or higher densities with at least the equivalent ~~level~~ amount of new residential floorspace; or

   ii. The proposal is for strategic infrastructure that demonstrably meets an identified need and is necessary to support delivery of the spatial strategy for the Borough~~.~~; and

h. ~~Ensuring the Borough's housing target aligns with the expected~~Ensuring the phasing of development corresponds with the delivery of infrastructure required to support growth and to speed up the rate of delivery of new homes where planning consent has been granted.

Inclusive and mixed neighbourhoods and communities

D. ~~All~~ Development proposals for housing ~~development~~ must demonstrate how they will contribute to and support inclusive and mixed neighbourhoods and communities across Lewisham. Details should be set out in the Inclusive Design Statement which must be submitted in accordance with Policy QD2 (Inclusive and Safe Design).

~~D.~~E. Development proposals ~~will be required to~~must deliver an appropriate mix of housing within the site and local~~ity~~ area. The appropriate mix should be established

Commented [NE183]: Amended for consistency with the spatial strategy for the Borough – see Policy OL1

Commented [NE184]: Amended for clarity and to aid policy implementation

Commented [NE185]: Amended for clarity and to aid policy implementation

Commented [NE186]: Amended to better reflect outcomes of the Council's recent Housing Delivery Test Action Plan

Commented [NE187]: Respond to consultation and Member feedback – greater emphasis on inclusive design. See also amendments to Policy QD2

on a case-by-case basis having regard to ~~individual~~ the site's location ~~circumstances (including location,~~ and character, ~~and~~ the nature and scale of development proposed~~),~~, along with:

a. The strategic target for 50~~%~~ per cent of all new homes delivered in the Borough to be for genuinely affordable housing;
b. The required mix of tenure types for affordable housing, ~~in line~~ with reference to Policy HO 3 (Genuinely affordable housing);
c. The need ~~for~~ to secure provision of a mix of unit sizes to meet local need, ~~including~~ with reference to the target unit size mix for affordable housing set out ~~in the Council's Housing Strategy, or other strategies and evidence base documents, as appropriate~~ Table 7.1;
d. The need for provision of family housing units (3+ bedrooms), with a~~n element of such provision~~ reasonable proportion of family units ~~expected~~ to be delivered on ~~schemes~~ major developments of 10 or more dwellings; and
e. The delivery of liveable and sustainable neighbourhoods that are appropriately supported by community facilities and other ~~strategic~~ infrastructure.

~~E.~~F. Development proposals ~~will be resisted where they~~ comprise~~e~~ing solely of studios and/or 1 bedroom, 1 person units, or those that will result in an overconcentration of 1 or 2 bedroom units on an individual site ~~or locality~~, will be refused unless it can be suitably demonstrated that the housing provision:

a. Is located in an area ~~that benefits from~~with higher ~~levels of~~ Ppublic Ttransport Aaccess~~ibility~~ Levels (i.e. PTAL 3-6); and
b. Forms part of a larger development, or is located within an area for which a masterplan has been adopted or endorsed by the Council, that includes ~~an appropriate amount of~~ provision for a ~~wider~~ mix of unit sizes, including a reasonable amount of family-sized units (3+ bedrooms); or
c. Is sited in a local~~ity~~ area that ~~benefits from good provision~~consists predominantly of ~~larger and~~ family ~~size~~ housing units, and would therefore provide for a ~~better~~ balance in the mix of unit sizes in the area; or
d. Is the only housing format deliverable owing to site size, site configuration or other development constraints, and where a studio unit is proposed, it is of an exceptional design quality.

Housing choice

~~F.~~G. To help ensure that local residents and other people have access to a wide range of suitable housing provision, the Council will:

a. Seek that development delivers a wide range of genuinely affordable and other housing products, including market housing, to meet the needs of households of different sizes and income levels;
b. Support development proposals that ~~are targeted to~~ meet~~ing~~ the needs of specific groups including: families with children, older people, people with disabilities, students and vulnerable people;
c. Promote and support innovative housing designs, such as modular housing, particularly where these address acute or specialist local housing needs;

Commented [NE188]: Respond to consultation – stronger requirements for family housing; plan amended to set specific targets on affordable products, informed by SHMA update 2021

Commented [NE189]: Amended to reflect infrastructure not limited to 'strategic' and can include other non-strategic types vital to sustainable neighbourhoods

Commented [NE190]: Respond to consultation – to aid effective implementation, and make clearer how over concentration will be assessed

Commented [NE191]: Respond to consultation – to aid effective implementation, and make clearer how overconcentration will be assessed within a locality

Commented [NE192]: Amended for clarity and to aid effective implementation

Commented [NE193]: Respond to consultation – site configuration should also be considered

d. Support appropriate proposals for self-build or custom build housing, and seek to identify land to help facilitate such development where a need is clearly established; and

e. Encourage developers and agents to market new housing units for sale or rent to existing local residents and ~~workers~~ people with a local connection before advertising them more widely to others.

~~G.~~H. Development proposals for Build to Rent housing will be assessed in accordance with London Plan policy H11 (Build to Rent). They must demonstrate that all such provision qualifies as Build to Rent by meeting the criteria set out in London Plan. Where the criteria are not met proposals will not be considered as Build to Rent and will be assessed against other relevant Local Plan policies.

Commented [NE194]: Amended to reflect the wider scope of people who may have a local connection to the Borough (e.g. family). The Council exercises no planning control in this respect but will encourage agents to support the approach.

Commented [NE195]: Respond to consultation – draft plan silent on Build to Rent, Council should make clear its position

Commented [NE196]: Respond to consultation – stronger requirements for family housing; plan amended to set specific targets on affordable products, informed by SHMA update 2022

Table 7.1 Target unit size mix for affordable housing

Tenure type	1 bed	2 bed	3 bed	4 or more beds
Social / London Affordable Rent	19%	36%	32%	13%
Intermediate	10%	40%	35%	15%

Explanation

Lewisham's strategic housing target

7.1. 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 Capital. The London-wide Strategic Housing Market Assessment (SHMA), which informed the preparation of the ~~draft~~ London Plan, identifies a need for some 66,000 additional homes per year to be delivered across London. To accommodate this need for housing the London Mayor advocates for fundamentally new approaches to housing delivery. The London Plan policies seek to achieve a significant uplift in housing across the region. They are set in the context of the limited availability of developable land in a highly urbanised, world city and the competing pressures for different land uses. The policies also respond to the need for major investment in strategic infrastructure, particularly public transport, to support housing growth on this scale and to unlock the full development potential of areas and sites.

7.2. In order to address the identified housing needs for the region, the ~~draft~~ London Plan sets out 10-year housing targets. It then directs local authorities to include the relevant borough-level targets within their local plans. ~~These targets have been informed by the London-wide Strategic Housing Land Availability Assessment (SHLAA), which considered the potential development capacity of large sites (0.25 hectares or more) across the region.~~ Boroughs are also required to set a positive planning framework to meet and wherever possible exceed the London Plan housing targets. For Lewisham, the 10-year strategic housing target for the period 2019/2020 to 2028/2029 is 16,670 net housing completions (equivalent to~~or~~ 1,667 net completions p.a.~~er year~~). The London Plan does not set housing targets past

this period however it provides a direction for borough local plans where targets are needed beyond 2029.[65] In light of this direction and local evidence on land availability, it is considered appropriate for the Local Plan to 'roll-forward' the borough's London Plan annual housing target. This will also ensure that the NPPF requirement to identify land for homes is satisfied.[66] Accordingly, the ~~1~~5-year target from the anticipated start date of the plan ~~period~~ 2023~~0~~/2024~~1~~ ~~– 2029/2035~~ is 11~~25~~,060~~05~~ and the 15-year target is 27,730 net housing completions. This is ~~(or~~ equivalent to 1,667~~)~~ net completions ~~per year~~p.a. plus additional completions during the first five years to cater for the current backlog (492 p.a.) and to provide a 5% buffer (83 p.a.).

Commented [NE197]: Factual updates following publication of new London Plan

~~7.3. The NPPF (2019) and its associated Planning Practice Guidance establish a standard method for determining the minimum number of homes needed in an area. Planning authorities are required to use this standard method for calculating 'Local Housing Need' in preparing their Local Plans, unless it can be demonstrated there are exceptional circumstances to justify the use of another method.[67] The draft London Plan was not required to use this standard approach in setting its revised housing targets. This is owing to the Government's transitional arrangements for implementing the new NPPF, which provided that the draft London Plan would be assessed against the previous version of the NPPF (2012). However, Lewisham's new Local Plan will be assessed against the current NPPF at its independent examination.~~

~~7.4. It is imperative that we prepare Lewisham's new Local Plan having regard to the draft London Plan, including the borough-level housing targets, in order to ensure it aligns with the spatial development strategy for the region. At the same time, we must ensure that national planning policy requirements are satisfied. Through the Lewisham Strategic Housing Market Assessment (2019), we have calculated the Local Housing Need (LHN) figure for the Borough, in line with the NPPF. The SHMA indicates that the current position for the borough is a minimum housing need figure of 1,939 net units per year based on the 2016 London Plan target. The LHN figure is 2,344 net units per year based on the draft London Plan (Intend to Publish version) annual housing target of 1,667 units. These LHN figures are significantly higher than Lewisham's strategic housing target set out in both the current and draft London Plan.~~

Commented [NE198]: Removed following publication of new London Plan

~~7.5.7.3. The Local Housing Need figure is not in itself a housing target. Rather, it is a starting point for considering the level of housing need that should be addressed through the plan-making process. Lewisham's new Local Plan is being progressed in the interim period where a future review of the London Plan, taking~~

[65] London Plan (2021), paragraph 4.1.11 states that "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.

[66] NPPF (2021), paragraph 68 provides that the Local Plan should identify specific, deliverable sites for year 1-5 and specific developable sites for years 6-10 and where possible years 11-15.

~~[67] NPPF (2019), paragraph 60.~~

~~into account the latest NPPF, is pending. There is, as of yet, no clear indication of how or whether the standard method for LHN will be taken forward by the London Mayor in the regional planning context. We are therefore taking a pragmatic approach at this time, by calculating the LHN figure and assessing whether it can be realistically achieved within Lewisham over the new plan period.~~ To help inform the~~is~~ preparation of the Local Plan the Council has undertaken an assessment ~~we have undertaken a number of exercises including~~to identify sources of land that may be suitable and available for housing development, including:

- A comprehensive review of land and sites available for development in the Borough, including by participating in the London-wide SHLAA;
- Undertaking of several 'call for sites' exercises inviting the public, including landowners, developers and agents, to help identify sites that might be suitable for different types of development;
- A Metropolitan Open Land Review to understand how the Borough's MOL is performing and whether there is scope to release any parts of this land to other uses, including for housing;
- Scrutiny of potential development sites to establish whether they are deliverable and developable[68], including through engagement with land owners~~, in the early stages of~~during the plan's preparation;
- Detailed assessments of the development capacity of potential development sites, taking into account the uplift in density and overall site capacity that could be achieved through the delivery of planned strategic transport infrastructure, particularly the Bakerloo line upgrade and extension to Hayes.

~~7.6.~~7.4. ~~Through the above exercises,assessment we have identified~~The Local Plan identifies specific ~~large~~ site~~s~~ allocations which have the potential capacity to deliver ~~approximately~~ 2~~45~~,413~~000~~ net new homes over the lifetime of the plan. When combined with other large consented sites and~~. When combined with~~ the trend-based windfall delivery rates in the Borough, there ~~is~~ will be sufficient capacity to ~~meet and~~ exceed the ~~draft~~ 10 year London Plan housing target and the NPPF housing target over a 5 year and 15-year period ~~plus an appropriate buffer~~[69] ~~.~~; H~~h~~owever the phasing of development will be an important consideration. ~~Meeting the NPPF Local Housing Need figure poses a significant challenge, given Lewisham's unique circumstances, particularly t~~There is a critical need for strategic transport infrastructure, particularly the Bakerloo line extension, to unlock the development potential of areas~~,~~ and to optimise the capacity of sites. A Housing Trajectory is included in an Appendix to the Local Plan which sets out details on the expected phasing of housing delivery over the plan period.

Commented [NE199]: Removed following publication of the new London Plan

Commented [NE200]: To reflect updated Appendix 6

Commented [NE201]: This is an NPPF requirement

[68] Deliverable and developable as defined by NPPF (2021), paragraph 67.
[69] In line with NPPF (2021) paragraph 74 a 5% buffer has been applied to ensure choice and competition in the market for land (this is moved forward from later in the plan period).

~~7.7.~~7.5. For the purpose of monitoring housing completions, ~~we will consider~~ net changes on conventional and non-conventional forms of housing will be calculated in line with the London Plan. For the avoidance of doubt, non-self-contained accommodation for students will be counted on a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home. Non-self-contained accommodation for older people (C2 use class) will be counted on a 1:1 ratio, with each bedroom being counted as a single home. All other net non-self-contained communal accommodation will count towards meeting housing targets on the basis of a 1.8:1 ratio, with one point eight bedrooms/units being counted as a single home.

~~7.8. Through this Regulation 18 consultation on Lewisham's Local Plan, we are consulting with the public to better understand whether there are any additional sites that could feasibly be delivered within the plan period, and whether the strategic sites (site allocations) included in Part 3 of the Local Plan are deliverable and developable, particularly according to the indicative capacities and timeframes set out.~~

~~7.9. In addition, through the Duty to Cooperate we are taking the opportunity to continue engaging with neighbouring and other planning authorities to understand whether they are, or will be, in a position to assist in accommodating any residual local housing need arising in Lewisham that may need to be addressed outside of the Borough.~~

~~7.10. Informed by outcomes of this Regulation 18 consultation, we will confirm an evidence-based housing target for Lewisham. We will also consider the options available for managing delivery towards the target over the plan period. This may include the need for the use of a 'stepped housing trajectory' to ensure that Lewisham's housing target reflects our latest knowledge on the expected phasing of larger development sites (including sites with planning consent), the rate of housing delivery experienced locally, and the delivery of strategic transport infrastructure.~~

~~7.11. The Council will keep under review the adopted Local Plan strategic housing target, having particular regard to the London Plan. Where any future amendments are made to the London Plan, including to the borough-level housing targets, then the Council will consider the necessity for a local plan review in order to ensure its local policies remain in general conformity with regional planning policies, and the spatial development strategy for London. Increasing housing supply~~

Commented [NE202]: Not required for Regulation 19 plan

~~7.12.~~7.6. The Local Plan seeks to facilitate a carefully managed uplift in the delivery of new housing development across the Borough to meet local needs, with priority given to genuinely affordable housing. There are a number of different routes to increasing housing supply which reflect the varying scale of opportunities available. These range from enforcement action to bring vacant housing units back into use, the sensitive intensification of small sites, and more strategically, the comprehensive redevelopment of larger brownfield sites ~~via~~ including those

for which site allocations have been prepared. All such routes to housing delivery relate to the spatial strategy for the Borough, which aims to direct development in support of Good Growth. We will work with development industry partners and other stakeholders to identify opportunities to optimise the capacity of sites that are suitable for new housing, ensuring that development will be appropriately supported by infrastructure.

Inclusive and mixed neighbourhoods and communities

~~7.13.~~7.7. Lewisham is a diverse Borough comprising of many vibrant and distinctive neighbourhoods and communities, which makes it an exciting place to visit and live. However, it also ranks amongst the most deprived local authority areas in England with pockets of social and economic deprivation scattered across the Borough. ~~We are~~The Council is committed to achieving inclusive and mixed communities~~, particularly in a way that is targeted at~~by addressing the ~~underlying causes of deprivation~~environmental, social and economic barriers adversely affect peoples' lives. The Local Plan seeks to facilitate a significant uplift in housing and our expectation is that new development should respond to existing imbalances in provision, so to better meet local needs and contribute to sustainable neighbourhoods and communities. This policy sets the strategic approach for securing an appropriate mix of housing when new development comes forward.

~~7.14.~~7.8. There is a significant and acute need for more genuinely affordable housing in the Borough, as set out in the London Strategic Housing Market Assessment (2017) and Lewisham Strategic Housing Market Assessment Update (20~~19~~22). Consistent with the ~~draft~~ London Plan, ~~we will seek that~~ development proposals must contribute~~s~~ towards the Borough's strategic target of 50 per cent of new homes to be genuinely affordable. Residential development proposals ~~will be expected to~~must maximise the amount of affordable housing on-site, subject to viability, having regard to the requirements in Policy HO 3 (Genuinely affordable housing). The strategic target is for delivery across the Borough recognising a number of sites are likely to make provision in excess of the target, such as those delivered by the Council through its housebuilding programme and by ~~associated with~~ registered providers. We will work proactively with partners and industry stakeholders, including private developers, to secure the delivery of more high quality and genuinely affordable housing.

Commented [NE203]: Amended to refer latest technical evidence

~~7.15.~~7.9. Development proposals ~~will be expected to~~must respond to local need by securing a mix of dwelling sizes (in terms of occupancy measured by bed spaces), particularly family sized units (i.e. 3+ bedrooms). ~~All~~ Development proposals for major residential development ~~will be expected to~~must make provision for ~~an element~~a reasonable proportion of family housing units, the amount of which will be considered on a case-by-case basis taking into account financial viability. Minor development proposals of less than 10 units incorporating family sized units will be considered favourably. ~~We will seek to resist against~~Development proposals ~~involving~~ should not normally result in the loss of family sized units (including through demolition and redevelopment); further

Commented [NE204]: Included for clarification and to aid policy implementation.

details on the conversion of family housing is set out in Policy HO2 (Optimising the use of small housing sites). ~~For~~ Where development proposals include an element of affordable housing, ~~proposals should have regard to the recommended~~ the unit size mix ~~set out in the Council's Housing Strategy, or the Council's latest evidence base on housing need~~ should be established with reference Table 7.1. All development proposals will be expected to demonstrate how the dwelling size mix is appropriate to the site in contributing to inclusive and mixed neighbourhoods and communities. ~~This includes consideration of existing and planned community infrastructure, and other strategic infrastructure, necessary to support the development and its likely occupiers. We will assess proposals having regard to the location and size of the site, the nature and scale of development, along with the existing mix of unit sizes within the locality.~~

Commented [NE205]: Included for clarification – HO2 allows for conversion of family homes but only where a family sized unit (3+ bed) is retained

Commented [NE206]: Respond to public consultation – request stronger requirements for family housing; plan amended to set specific targets on affordable products, informed by SHMA update 2022

Commented [NE207]: Repetition – re-stating policy and also covered elsewhere in plan

~~7.16.~~7.10. To help secure inclusive and mixed neighbourhoods and communities, we will resist development proposals that comprise solely of studios and 1 bedroom, 1 person units or those that ~~would~~ will result in an overconcentration of 1 or 2 bedroom units on a site or local~~ity~~ area. London Plan policy H10 (Housing size mix) makes clear that developments with a higher proportion of 1 and 2 bedroom units are generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity. This policy is considered to provide sufficient flexibility to respond to individual site circumstances~~.~~, ~~such as~~For example, in situations where there are site development constraints or where proposals for such provision would demonstrably enhance the mix and balance of housing unit types within a larger development site or local~~ity~~ area. Studio units intended for single person occupation are not considered to provide a long-term, sustainable solution to meeting local housing need. ~~In exceptional cases,~~ Development proposals for studio units may be permitted where they are of an exceptional design quality, minimum space standards are satisfied and the development is appropriately located~~,~~ in a well-connected and highly accessible location that benefits from good provision of local amenities.

Commented [NE208]: Respond to consultation – to aid with policy implementation, clarify approach advocated in London Plan

Housing choice

~~7.17.~~7.11. The availability of a wide range of housing choices, with provision for a mix and balance of housing types, sizes and tenures is essential to the achievement of inclusive neighbourhoods and communities. We will generally support proposals that enhance housing choice and access to genuinely affordable housing in Lewisham ~~the locality, including for new specialist forms of accommodation tailored to specific groups (including older people, students, those with disabilities and vulnerable people)~~. The Local Plan sets out additional policies that address the ~~unique housing requirements of such~~needs of different groups~~, having regard to identified needs, including QD2 (Inclusive and safe design), HO5 (Accommodation for older people), HO6 (Supported housing) and HO7 (Purpose built student accommodation).~~ including those who require specialised forms of housing. Further details are set out later in this section.

Commented [NE209]: Amended to make more concise

~~7.18.~~7.12. Lewisham is gaining a reputation as a location for innovative housing design with both public and private sector led developments winning or being recognised for design awards in recent years.[70] ~~For example, PLACE/Ladywell is an award winning scheme recognised for its pioneering off-site construction techniques and modular building format. It comprises of temporary accommodation for homeless families and start-up space for local businesses and retailers.~~ We are broadly supportive of development proposals ~~for such~~ applying innovative and contemporary ~~housing~~ designs where they comply with other Local Plan policies. ~~On~~ Development proposals for housing ~~involving~~ as a meanwhile use~~s, we will take a positive and flexible approach to decisions if it can be demonstrated that development helps to meet identified local housing needs, makes a positive contribution to the locality and does not adversely impact on amenity. Further requirements are set out in~~will be considered with reference to P~~p~~olicy ~~EC22~~ DM5 (Meanwhile uses).

Commented [NE210]: Amended to make more concise

~~7.19.~~7.13. Those with a connection to Lewisham, including people currently living or working locally or with family connections in the Borough should have a good opportunity to access new housing as it is made available on the private market. We will therefore encourage developers and agents to advertise new units locally, ideally for a period of 3 months, before marketing them more widely. Whilst the Council exercises no planning control in this respect, it will broadly support developers and agents in making a reasonable proportion of new residential units available to local residents, UK citizens and others with a strong connection to the Borough, particularly for owner occupation.

HO 2 Optimising the use of small housing sites

A. The development of small sites will play an important role in increasing housing supply in Lewisham and supporting provision for a wide range of high quality and affordable homes. Opportunities should be taken to optimise the capacity of small sites for new housing development across the Borough, including through:
   a. Redevelopment of vacant and underused brownfield sites, and ancillary buildings such as garages;
   b. ~~Residential~~ Housing conversions~~, having regard to Policy HO2.E below~~;
   c. ~~Residential~~ Housing alterations and extensions~~, having regard to Policy QD10 (Building alterations, extensions and basement development)~~; and
   d. Infill and backland development~~, having regard to Policy QD11 (Infill and backland sites, garden land and amenity areas)~~.

Commented [NE211]: References to other Local Plan policies removed to make more concise – the plan must be read as a whole

B. To help facilitate the appropriate development of small sites for housing~~, including through the sensitive intensification of existing buildings and sites,~~ the Council ~~will~~ has prepared ~~a suite of supplementary planning documents~~the Small Sites SPD and the Alterations and Extensions SPD. Development proposals ~~will be expected to~~should have regard to this ~~planning~~ guidance, where relevant, and demonstrate how it has been used ~~to inform the development~~ through the design-led approach.

Commented [NE212]: Factual updates to refer Council's adopted planning guidance.

[70] The Council's Authority Monitoring Reports include information on design awards. Information is also available from professional bodies such as the Royal Institute of British Architects (RIBA).

C. Development proposals for housing on small sites will only be supported where they help to facilitate the delivery of the spatial strategy for the Borough and:
   a. Are appropriately located for residential use;
   b. Are ~~designed to a~~of a high quality ~~standard~~ design with accommodation that meets the relevant standards for ~~private internal and outdoor~~living and amenity space, ~~having particular regard~~with reference to Policy ~~HO5~~ QD8 (High quality housing design);
   c. Respond positively to local character, including historical character and heritage assets;
   d. Protect and enhance biodiversity and green infrastructure, and further maximise opportunities for urban greening;
   e. ~~Contribute towards the delivery of~~Make provision for affordable housing, in line with Policy HO3~~.~~ (Genuinely affordable housing);
   f. Protect and do not result in unreasonable adverse~~ly~~ impacts on local amenity;
   g. Do not result in the loss of community infrastructure, ~~having regard~~with reference to Policy CI1 (Safeguarding and securing community infrastructure); and
   h. Do not prejudice the delivery of ~~strategic~~ site allocations in the Local Plan.

D. Neighbourhood forums are strongly encouraged to identify locations and allocate sites appropriate for housing development, including small sites, within neighbourhood plans.

Housing conversions

E. In order to maintain a supply of housing suitable for families, development proposals for the conversion of a single family dwelling, or self-contained unit with 3+ bedrooms, into smaller self-contained residential units (including flats) will only be supported where:
   a. The gross internal floor space of the ~~existing~~ original dwelling is 130 sq. metres or greater;
   b. A family sized unit (3+ bedrooms) is re-provided, unless it is demonstrated that the property is not suitable for family accommodation due to environmental or other site constraints;
   c. All housing units benefit from a layout and configuration that is practical for residential occupation, ~~and the development complies with other relevant policy requirements for housing and~~with reference to other policies on high quality design;
   d. In the situation garden land or other dedicated private outdoor amenity space is available, the extent of and access to this private amenity space is maintained for the existing family unit, and wherever possible, made accessible to residents in other units;
   e. ~~It is demonstrated that existing and additional demands for parking and servicing created by the development can be appropriately accommodated, having regard to other Local Plan policies, including Policy TR4 (Parking) and SD12 (Design to support the circular economy)~~; and
   f. The development ~~would~~ will not result in an adverse impact on local character ~~and townscape~~.

Commented [NE213]: Respond to consultation – heritage assets should be specifically referred

Commented [NE214]: Respond to consultation – clarification point to ensure appropriate consideration of instances where the building is extended and then proposed for conversion

Commented [NE215]: Respond to consultation – request to amend wording to capture private amenity spaces and strengthen their protection

Commented [NE216]: Respond to consultation- amended to ensure conformity with London Plan, which provides that housing growth should not be unduly restricted due to parking stress

F. Development p~~P~~roposals for the conversion of properties into Houses in Multiple Occupation will be considered against Policy HO~~ 8~~ 8 (Housinges with Shared Facilities - Houses in Multiple Occupation).

Figure 7.1 - Small Sites Housing Opportunities

Commented [NE217]: To be included - London Plan requires that small sites areas are identified in Local Plan. This will be the same map as on Page 19 of Council's adopted Small Sites SPD.

Explanation

~~7.20. The NPPF (2019) places a strong emphasis on the role of small sites in supporting housing delivery. This is also reflected in the draft London Plan, which introduces a significant step change in the strategic approach to meeting housing need across the Capital. As part of this approach, it seeks to increase the rate of housing delivery from smaller sites. This is particularly in highly accessible residential and outer suburban areas, where there are considered to be key opportunities to intensify sites. All boroughs are expected to help facilitate the development of small sites in a positive and proactive way. This policy establishes our approach to ensuring that small site development is appropriately managed in the Lewisham context.~~

Commented [NE218]: Removed to make more concise. Further information on small sites also set out in London Plan.

~~7.21.~~7.14. The ~~draft~~ London Plan sets out a 'small sites' housing target for every borough. Small sites are defined as those that are less than 0.25 hectares. ~~The targets are based on trends in housing completions on sites of this size.~~ The small sites target is a component of, and not additional to, the overall housing target ~~set by the draft London Plan~~. For Lewisham, the small sites target for the ten-year period from 2019/20 is 3,790 net housing units, or 379 units per year. This is broadly in line with our monitoring of 'windfall' development on small sites in the Borough. The small sites target makes up roughly ~~23 per cent~~one-quarter of the borough's ~~overall draft~~ London Plan housing target.

~~7.22.~~7.15. Through the Local Plan we are seeking to boost the delivery of small housing development beyond the historic delivery levels. Our aim is not only to meet the ~~draft~~ London Plan small sites target but to exceed it, recognising a variety of measures are needed to achieve the overall housing target and meet the range of housing needs of different groups in the Borough. This includes need for genuinely affordable housing. Through the development and sensitive intensification of small sites, there will be more opportunities to secure planning contributions that can be invested in the delivery of new affordable housing units. Furthermore, small sites can play an important role in addressing local deprivation. For instance, the designated Area for Regeneration in the south of the Borough, discussed in Part 3, has a distinctive character and urban grain based on its historic estate development. There is a lack of large site opportunities to generate investment in this area. Small site development provides a mechanism for more incremental investment and area improvement that can help to address the underlying causes of deprivation. In short, our positive approach to small site development is informed by the Local Plan's strategic objectives, and is not simply a matter of housing numbers.

~~7.23.~~7.16. There are a variety of opportunities and types of small sites that can support new housing development. Vacant and underused brownfield sites along with redundant ancillary facilities, such as garages or residential storage units, present relatively straightforward options for redevelopment. However these types of sites are limited in availability and are often constrained, such as by irregular plot forms, site access issues or land-use designations (including those that protect land for commercial uses). It is therefore expected that the majority of small sites development will occur in ~~existing~~ established residential areas, where new homes can be sensitively integrated with other compatible uses. Housing development on small sites can take a number of forms including: new build, infill and backland development, conversion (subdivision of houses into flats), demolition and redevelopment or extension of existing buildings (including upward, rear and side extension, and basement development).

~~7.24.~~7.17. Our approach to housing development on small sites is expected to facilitate the incremental intensification of ~~existing~~ established residential areas, particularly where sites have a good Public Transport Access~~ibility~~ Level (PTAL 3-6) and/or they are within 800 metres of a station or Major/District town centre. It is imperative that future growth and development occurs in a way that respects and enhances local character, with the distinctive features of Lewisham's communities at the heart of the design-led approach. The Lewisham Characterisation Study (2019) identifies areas that are positioned to facilitate an uplift in small housing development, recognising that the physical character of some areas may need to evolve gradually over time, for example, to accommodate new housing and investment in infrastructure. The Characterisation Study defines areas on a spectrum of sensitivity to change, based on local character, taking into account factors such as existing urban grain, historic evolution, building typologies, and spatial strategic growth and regeneration priorities across the Borough. All proposals for small housing development will be expected to refer this document, as a starting point, to understand the scope for intensification in a given area and to gain an appreciation of the key features of local character. The Council has also prepared a Small Sites SPD to support the delivery of high quality housing. All development proposals for small sites must demonstrate how the SPD has been used to inform the design-led approach.

~~7.25. The Characterisation Study must be read in conjunction with other design guidance to ensure that development is appropriate to the site and surrounding area. The Council will prepare and make available a suite of guidance documents to assist with the implementation of this policy. This includes existing and additional Conservation Area Appraisals and the Alterations and Extensions SPD (2019). We are also preparing future guidance to support the sensitive intensification of areas, including the A21 Design Guide SPD and Small Sites SPD, both of which will be prepared with support from the GLA Homebuilding Capacity Fund. This local guidance should be read alongside the design principles for small housing development that the Mayor of London has committed to publishing.~~

Commented [NE219]: Repetition – this is covered elsewhere in the plan

~~7.26.~~7.18. Where small site housing development is proposed it should not have an unacceptable adverse impact on biodiversity and green infrastructure. Applications will be expected to identify potential impacts in this regard, and clearly set out measures to minimise and mitigate these. Measures may include the return of hard standing to green space, installation of green roofs and walls, and sustainable landscaping. In exceptional circumstances, where site constraints demonstrably preclude the implementation of on-site measures, then off-site provision (for example, tree planting) may be acceptable in order to ensure policy compliance. Off-site provision will be secured on a case-by-case basis through the use legal agreements and/or planning contributions.

~~7.27.~~7.19. This policy presents a new strategic approach to meeting housing need locally. An allowance for small site development has been made in the Local Plan housing trajectory. This sets out the expected rate of housing delivery over the plan period, based on past trends. We will monitor progress towards the small site housing target through the Authority Monitoring Report and consider this policy's effectiveness through the Local Plan review process. Monitoring will also provide us with information to understand the spatial distribution of new small housing development and consider whether interventions are necessary, for example, to ensure those areas where this type of development is concentrated are appropriately supported by community facilities and other strategic infrastructure.

Housing conversions

~~7.28.~~7.20. The Local Plan seeks to ensure provision for a wide range of housing types and tenures to meet local need, including need arising from families. The conversion of larger and single family homes into flats has in recent years provided a small source of housing supply in Lewisham. Whilst recognising that conversions support delivery towards the strategic housing target, it is important that provision for family accommodation is not compromised. The Local Plan therefore sets out requirements to ensure that family sized units (3+ bedrooms) are retained when residential conversions come forward. Th~~e~~is ~~is particularly in light of the~~ Lewisham SHMA (~~2019~~2022~~), which~~ shows there is an ~~a particular local~~acute need for family housing.

~~7.29.~~7.21. There is a limited supply of family sized housing units in the Borough, with the SHMA indicating that 1 and 2 bedroom units comprise the majority of existing properties (~~roughly~~ at 6~~0~~1 per cent, above the averages for London and England at 56 and 41 per cent respectively). Furthermore, monitoring information demonstrates that the vast majority of recent new build residential development has been for flats or apartments, mainly 1 and 2 bedroom units, and it is anticipated that this trend will continue into the future. ~~With the Lewisham SHMA suggesting that there will be an increasing need for family accommodation, we will seek to ensure that~~Development proposals must therefore ensure that existing family sized units are not unnecessarily lost through conversion. This policy is not considered to ~~-~~inhibit the achievement of the small sites housing target, as proposals will continue to be supported where adequate family sized units are retained or re-provided.

~~7.30.~~7.22. ~~Whilst we are intent on retaining family sized units on residential conversions,~~ S~~s~~ome flexibility may be applied on a case-by-case basis where it can be suitably demonstrated that environmental or other site specific constraints make re-provision of a family sized unit inappropriate. This includes consideration of the site or building size (which might compromise achievement of the minimum space standards for a 3+ bedroom unit), lack of amenity space suitable for a family, or other environmental constraints that would adversely impact on occupants, particularly children and young people.

~~7.31. Having regard to site location, PTAL levels and relevant parking standards, proposals will be required to demonstrate that the residential conversion will be able to cope with any demand for parking arising from the development, including for disabled and cycle parking. Where appropriate, evidence of a parking survey will be required to support the proposal, having particular regard to on-street parking capacity.~~

Commented [NE220]: Respond to consultation - amended to ensure conformity with London Plan, which provides that housing growth should not be unduly restricted due to parking stress

HO 3 Genuinely affordable housing

A. The strategic target is for 50 per cent of all new homes delivered in Lewisham to be genuinely affordable. The Council will seek the maximum amount of genuinely affordable housing to be delivered on new housing developments. Development p~~P~~roposals that deliver high quality affordable housing through the Fast Track Route, as detailed in HO3.F below, to achieve a minimum 35~~%~~ per cent affordable housing will be considered favourably. Development p~~P~~roposals involving new housing ~~development~~ will only be supported where the site capacity has been optimised and delivery of affordable housing maximised.

Commented [NE221]: Moved from C below

B. The affordable housing requirement will apply to all forms of conventional housing in the C3 Use Class, unsecured student accommodation and, where appropriate, specialist and supported accommodation. Affordable housing requirements for Purpose Built Student Accommodation are set out in Policy HO~~8~~7 (Purpose Built Student Accommodation).

C. ~~Proposals involving new housing development will only be supported where the site capacity has been optimised and delivery of affordable housing maximised.~~ The affordable housing requirements for major developments (large sites) will ~~also~~ apply in circumstances where development has already been permitted and 10 or more dwelling units will be delivered taking into account:

Commented [NE222]: Moved to A above

Commented [NE223]: Amended to clarity and to aid policy implementation

   a. New residential units that are proposed which would result in an uplift in the overall number of units on the site of the extant permission; and
   b. Development that is proposed on an adjacent site~~,~~ which~~,~~ by virtue of its layout, design and use~~,~~ is functionally related to the extant permission and would result in an uplift in the overall number of units across the sites.

D. Applicants will be expected to make all reasonable efforts to secure grant funding to deliver an increase in affordable housing beyond the level that would otherwise be achievable. The Council will work positively with development industry partners to help identify opportunities to secure grant funding to deliver more genuinely

affordable housing in Lewisham. Development proposals will be considered favourably where they demonstrably deliver the maximum viable amount of affordable housing whilst meeting the minimum threshold level of affordable housing without public subsidy, as set out in HO3.F, and secure grant funding to deliver provision of genuinely affordable housing additional to this level.

Large sites (major developments)

E. Development p~~P~~roposals for new housing ~~development~~, including mixed-use ~~schemes~~developments, with site capacity to accommodate 10 or more dwelling units must deliver the maximum amount of genuinely affordable housing, taking into account:
   a. Their contribution to the Borough's strategic affordable housing target, based on habitable rooms, subject to viability;
   b. The need for provision of a mix of secure housing tenures, with the affordable component sought to be provided on the basis of a tenure split of 70 per cent genuinely affordable (social rent or London Affordable Rent) and 30 per cent intermediate (London Living Rent or shared ownership);
   c. The preferred housing size mix for ~~genuinely~~ affordable housing, as set out in ~~the Council's Housing Strategy, or other supporting evidence~~Table 7.1;
   d. Availability of public subsidy; and
   e. Other planning benefits that may be achieved, having particular regard to the delivery of the spatial strategy for the Borough.

F. A threshold approach to viability will be applied to major development proposals, in accordance with ~~draft~~ London Plan policy H~~6~~5 (Threshold approach to applications), taking into account the different routes to affordable housing delivery (i.e. Fast Track Route and Viability Tested Route). In Lewisham, the threshold level of affordable housing on gross residential development~~, which is not on public sector land,~~ is set at:
   a. A minimum of 35 per cent; ~~or~~
   ~~a.~~b. A minimum 50 per cent on public sector land;
   ~~b.~~c. A minimum of 50 per cent for Strategic Industrial Locations and Locally Significant Industrial Sites where development would result in a net loss of industrial capacity.

G. Where the Viability Tested Route is used, and in other circumstances where a V~~v~~iability A~~a~~ssessment is submitted to support the level of affordable housing provision made by a development proposal, this must be based on a standard residual valuation approach, with the benchmark existing use value of the land taken as the E~~e~~xisting~~/alternative~~ U~~u~~se V~~v~~alue (EUV) Premium or the potential for Alternative Use Value[71]~~, in line with National Planning Practice Guidance~~. In order to ensure transparency in the planning process~~,~~ the V~~v~~iability A~~a~~ssessment ~~will be required to~~must be undertaken in line with the Mayor's Affordable Housing and Viability SPG or future equivalent.

[71] This approach is line with the Government's National Planning Practice Guidance and the London Mayor's Affordable Housing and Viability SPG.

Commented [NE224]: Deleted for clarity and conformity with London Plan (see addition of F.b)

Commented [NE225]: Respond to public consultation – amended to ensure conformity with London Plan

Commented [NE226]: Clarification to aid effective policy implementation

Commented [NE227]: Respond to consultation – clarification points to ensure consistency with higher level planning guidance

Commented [NE228]: Signposted in footnote below

H. To maximise affordable housing delivery and address economic uncertainties that may arise over the lifetime of a development proposal the use of 'review mechanisms' will be required, where appropriate, and implemented in line with the Mayor's Affordable Housing and Viability SPG.

I. In order to promote inclusive and mixed communities all new affordable housing provision should be delivered on-site. Off-site provision for major development proposals will only be considered in exceptional circumstances, where it can be demonstrated to the satisfaction of the Council that:
    a. It is not practical or feasible to provide affordable housing on-site due to site development constraints;
    b. A higher level of affordable housing can be secured through provision on an alternative site;
    c. Off-site provision is necessary to better meet priority housing need, such as for affordable family housing;
    d. The provision will better support inclusive and mixed communities.

Small sites (minor developments)

J. Development p~~P~~roposals for new housing ~~developments~~ delivering ~~less than 10~~between 2 and 9 dwelling units ~~will be required to~~ must make provision for affordable housing.~~a financial contribution towards the delivery of affordable housing~~, ~~having regard to the Council's Planning Obligations Supplementary Planning Document, or other guidance as appropriate. Proposals~~ They should seek to deliver affordable housing on-site ~~provision~~ wherever ~~practical and~~ feasible~~, before considering the use of planning contributions to support the delivery of affordable housing off-site~~ Where it can be demonstrated to the satisfaction of the Council that off-site contributions are acceptable these will be secured through planning obligations, with payments in lieu calculated using Table 7.2 (Small sites affordable housing requirements) and the formula set out in Table 7.3 (Small sites affordable housing payments in lieu). Further details will be set out in the Planning Obligations SPD.

Commented [NE229]: Amended for clarification and to aid policy implementation, also taking into account findings of the Viability Assessment update for the Local Plan. This includes Tables 7.2 and 7.3

Table 7.2 Small sites affordable housing requirements

Total number of units	Equivalent number of on-site affordable units to be used to calculate payment in lieu[72]
2	0.70
3	1.05
4	1.40
5	1.75
6	2.10
7	2.45

[72] The equivalent number of on-site affordable units is based on the 35 per cent affordable housing requirement of the Fast Track Route of the threshold approach set out in London Plan policy H5 (Threshold approach to applications), i.e. where 1 dwelling unit is equivalent to 0.35 affordable units.

8	2.80
9	3.15

Table 7.3 Small sites affordable housing payments in lieu

Formula for calculating payments in lieu
X = ((A-B) x C) – ((A x C) x D)
X = the payment in lieu (£) A = the market value of a square metre of floorspace in the development B = the value of affordable housing per square metre of floorspace (reflecting the mix between genuinely affordable and intermediate products) C = the number of square metres required to meet the affordable housing requirement D = additional costs to the developer (the difference between profit applied to market housing and affordable housing, and marketing costs of private housing)[73]

~~J. Development proposals on small sites will also be considered against Policy HO3.C above. Affordable housing requirements for large sites will apply where 10 or more dwelling units are proposed on small housing sites, whether these units are brought forward on one site or together on multiple, functionally related sites.~~

Commented [NE230]: Repetition – this is captured in Policy HO3.C above

Inclusive and mixed neighbourhoods and communities

K. In order to secure inclusive and mixed neighbourhoods and communities the Council may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis. In establishing the most appropriate level of provision for a site, development proposals will be considered having regard to the existing levels of housing tenure and mix in the area (including extant permissions), along with development viability.

L. All new affordable housing developments must be ~~designed to~~of a high quality ~~standard,~~design having regard to other Local Plan policies. ~~Development should be sensitively integrated into the site and its surroundings, with affordable housing units being~~ They must be designed to be 'tenure neutral' in accordance with the National Design Guide, so that affordable units are indistinguishable from market units in terms of quality of design and materials, space standards, access and amenity ~~provision~~. Where mixed tenure schemes are proposed~~,~~ these ~~will be required to~~ must ensure all residents of the development have access to amenities and communal spaces~~,~~ including play spaces, with reference to Policy QD2 (Inclusive and safe design).

Commented [NE231]: Repetition – covered elsewhere in the design polcies

Commented [NE232]: Respond to consultation – policy strengthened on inclusive design principles (links also to changes in Policy QD2)

Vacant Building Credit

[73] Developer profit is typically applied at between 17-20% of GDV on private housing and 6% on the affordable housing, so the increased profit arising from converting a unit from private to affordable housing would be 11% to 14% (i.e. 17% or 20% less 6%).

M. The application of the Vacant Building Credit (VBC) is not appropriate in Lewisham. The use of VBC will only be considered in limited circumstances, where applicants suitably demonstrate there are exceptional reasons why it is appropriate and the following criteria are met:

a. The building is not in use at the time the application is submitted;
b. The building is not covered by an extant or recently expired permission;
c. The site is not protected for an alternative land use; and
d. The building has not been made vacant for the sole purpose of redevelopment, as demonstrated by evidence showing that the building has been vacant for a minimum continuous period of five years and has been actively marketed for at least two years therein, at realistic local area prices.

Explanation

The need for genuinely affordable housing

~~7.32. There is a strong record of housing delivery in Lewisham, with the cumulative London Plan housing target being exceeded since the adoption of the Core Strategy in 2011. The extent of housing delivery is indicative of a strengthening market and growing developer confidence in the Borough. Against this backdrop, however, issues persist with respect to the resident population's ability to access to housing that is affordable within their means.~~

Commented [NE233]: Deleted – details on housing delivery addressed in Policy HO1

~~7.33.~~7.23. Although there is a strong record of housing delivery in Lewisham not everyone is able to access housing that is affordable within their means. The Lewisham ~~Strategic Housing Market Assessment (~~SHMA~~)~~ (2022) indicates that whilst median house prices in Lewisham are lower than those for London on whole they have increased by more than 3~~0~~30 per cent over the past twenty years~~.~~. This is marked by an accelerated rate of increase ~~in the five-year period~~ from 2013 to ~~2017~~2020, with median house prices rising from ~~£259,000~~ £259,800 to ~~£412,000~~ £430,000 in this short period. The rate of increase is significantly higher than that experienced across London and in many neighbouring ~~authorities~~boroughs. Home ownership is now out of reach for many Lewisham residents, particularly first time buyers, with median house prices more than 10 times the average household income. The cost of private rented sector housing has also increased pointedly over recent years. ~~By 2017, average private rents in Lewisham equated to roughly 43 per cent of average household incomes,~~Over the 10-year period 2010 to 2020 private median rents rose by more than 45 per cent, significantly higher than the rate for London and England, at 17 and 28 per cent respectively, making this housing option unaffordable to many. The above situation has contributed to acute issues of overcrowding and homelessness in the Borough, which is reflected by the extensive number of households on the Council's Housing Register. As of May 2019 there were approximately 10,000 households on the housing waiting list, which represents approximately 7.6% of households in the Borough.[74] In short, the gap between incomes and housing costs is rapidly widening, and as a consequence there is a significant local need for affordable housing.

Commented [NE234]: Updated SHMA 2022 figures

[74] Lewisham Housing Department statistics, May 2019.

~~7.34.~~7.24. In light of the above, 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 ~~draft~~ 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[75] 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. Furthermore, genuinely affordable housing and intermediate housing should provide for secure tenancies. For genuinely affordable homes, we will seek that residents are provided with lifetime tenancies, ideally in perpetuity.

~~7.35.~~7.25. Our expectation is that the maximum amount of genuinely affordable housing will be delivered on all new residential development sites, having regard to viability. Habitable rooms will be used as the basis for calculating affordable housing provision against the Borough's strategic target, as advocated by the ~~draft~~ London Plan. This measure provides flexibility to deliver affordable housing that is best tailored to meeting the range of local needs, and in particular to enable additional provision of affordable family sized units to come forward.

7.26. Affordable housing will be required from all large sites with capacity to accommodate 10 or more residential units, and this applies where development is proposed incrementally. This includes variations to a planning consent resulting in additional units on the site. This policy seeks to guard against actions to circumvent the affordable housing requirements, such as through the artificial sub-division or phased development of sites. In considering whether the affordable housing requirement should apply in these circumstances, we will have regard to: extent of single ownership of land and sites; occupied status of land/sites at the grant of permission and at commencement of development; and the amount of time elapsed between permissions, completions and any new proposals.

~~7.36.~~7.27. Contributions towards affordable housing will also be required on small sites for new ~~housing~~ developments delivering ~~less than 10~~between 2 and 9 dwelling units. ~~Our latest evidence indicates~~The Local Plan Viability Assessment (2022) demonstrates that this requirement will not adversely impact on the development viability of small sites across the Borough. Development proposals should seek to deliver affordable housing on-site wherever feasible. Off-site provision will be secured through planning obligations with any payments in lieu calculated using Tables 7.2 and 7.3. ~~Further details to support implementation of this policy will be set out in a future update to the Planning Obligations SPD.~~

Commented [NE235]: Repetition – this is set out in 7.32

[75] GLA London Affordable Rent is defined locally as London Affordable Rent, minus the 1% above Consumer Price Index uplift.

~~7.37.~~7.28. In line with the ~~draft~~ London Plan, a threshold approach to viability will be applied in Lewisham. This means that schemes meeting or exceeding the ~~draft~~ London Plan policy ~~and threshold (as set out in Policy~~ H~~6~~5 ~~—~~ (Threshold approach to applications) without public subsidy can be 'fast-tracked' and are not required to submit detailed viability information. However, to ensure an applicant fully intends to build out the planning consent~~,~~ an early stage viability review will be triggered if an agreed level of progress on implementation of the development is not made within a specified time period. Thresholds are expected to be regularly reviewed by the London Plan, and may therefore change over the course of the plan period.

~~7.38.~~7.29. All development proposals will be expected to demonstrate that they have maximised the amount of genuinely affordable housing on-site in contributing to the delivery of the Borough's affordable housing target. Applicants are encouraged to investigate realistic options to provide a further uplift of genuinely affordable housing (i.e. beyond that which can be viability delivered through development value alone) including through the use of public subsidy. This will require engagement with industry stakeholders, including Registered Providers, early in the development process to identify and capitalise on opportunities available. Where subsidy is secured, applications will be expected to clearly state the level of affordable housing that is to be provided using this subsidy. This clarification is required in order to assess schemes against the policy requirements, and for effective and transparent implementation of the threshold approach.

~~7.39.~~7.30. Development p~~P~~roposals that do not provide the minimum required amount of genuinely affordable housing will be strongly resisted. Where applicants consider there are exceptional circumstances affecting the viability of a scheme and delivery of policy objectives, ~~we will require that these are set out in a~~this must be justified through the submission of a detailed Viability Assessment. This must be undertaken by a suitably qualified professional (such as one accredited by the Royal Institute of Chartered Surveyors) and will be made publicly available upon validation of the planning application. All such assessments will be considered having regard to higher level policies and associated guidance. This includes the NPPF and companion National Planning Practice Guidance on 'Viability and decision taking', the London Plan and Mayor's Affordable Housing and Viability SPG (2017), or future equivalent. A lower level of affordable housing will only be permissible where there are clear barriers to delivery and development is fully justified through detailed viability information. We may require that an independent appraisal of the Viability Assessment is undertaken, which will need to be paid for by the applicant.

~~7.40.~~7.31. Consistent with national planning policy, our expectation is that affordable housing will be delivered on-site. This is in order to promote inclusive and mixed communities, as well as to help ensure that there is no undue delay to the delivery of affordable housing when it is included with proposals for market housing. However, there may be exceptional circumstances where it is appropriate to deliver affordable housing off-site~~,~~ including through payment~~-~~ in~~-~~

lieu ~~contributions~~. Applications will be required to provide robust justification for any off-site provision~~, having regard to the criteria in the policy~~. Viability alone will not be considered sufficient justification for off-site provision.

~~7.41.~~7.32. When off-site provision is acceptable in principle, we will expect all subject sites to be considered together for the purpose of calculating the level of affordable housing provision required. All off-site affordable housing must be provided within the Borough and be appropriately located, having regard to other policies that seek to provide residents with high quality living environments. Payment~~-~~ in~~-~~ lieu contributions may be accept~~ed~~able on small-sites and on major developments where there are demonstrable benefits ~~in furthering~~to delivering affordable housing provision along with inclusive and mixed neighbourhoods. Payments will be ring-fenced~~,~~ and where appropriate pooled~~,~~ to help maximise affordable housing delivery locally. Applicants should refer the Mayor's Affordable Housing and Viability SPG (2017), or future equivalent, along with the Council's Planning Obligations SPD for further guidance.

~~7.42.~~7.33. Viability 'review mechanisms' are reappraisal tools that can be used to ensure maximum public benefit is secured from development, including benefits associated with affordable housing delivery. Review mechanisms can be particularly important on phased schemes or schemes with longer build out periods, and are a useful way to respond to economic uncertainties that may arise over the lifetime of a development proposal. We will seek to apply viability review mechanisms as a standard practice, and implement them in line with the London Plan and its associated guidance. This will help to ensure that if there is an improvement in viability over lifetime of the development proposal, this contributes to the maximum amount of affordable housing provided. Further details on the implementation of this approach are set out in the Mayor's Affordable Housing and Viability SPG (2017).

7.34. The most pressing need in Lewisham is for new social homes with social rents. However there is also a need for affordable housing which is available to people who are unable to access social housing due to the rigorous eligibility criteria, but are also unable to afford private market housing. Therefore, where affordable housing is required on new development this should be provided on a tenure split basis of 70 per cent social rent or London Affordable Rent and 30 per cent London Living Rent or shared ownership. We support the use of London Living Rent, as by its nature, it is affordable to households earning the Lewisham median household income. Shared ownership products may also be an acceptable form of tenure, where the total monthly costs are demonstrably affordable.

7.35. In preparing the Local Plan the Council has given consideration to First Homes as a component of the affordable housing tenure mix. Provisions on First Homes were introduced through a Written Ministerial Statement on 24 May 2021 and

incorporated into the NPPG.[76] First Homes are a specific type of discounted market housing which should meet the definition of affordable housing.

~~7.43.~~7.36. The Lewisham SHMAA (2022) raises issues around the affordability of First Homes in the context of local median household incomes. It also sets out how the introduction of First Homes would adversely impact on the delivery of genuinely affordable housing, for which the identified need in Lewisham is greatest. The Lewisham Local Plan Viability Assessment (2022) has also tested the introduction of First Homes as a component of the affordable housing tenure mix, using the benchmark 25 per cent proportion recommended by the NPPG. It concludes that First Homes are unlikely to be accessible to those on lower incomes and would result in a significant reduction in availability of affordable housing for purchase. In light of the above, the Local Plan does not make specific provision for First Homes. This position is supported by the Mayor of London who has also raised concerns about deliverability of First Homes in London, particularly around criteria concerning price caps on properties and income caps on applicants.[77]

Commented [SA236]: Additional guidance on First Homes

~~7.44.~~7.37. In line with other Local Plan policies, all new affordable housing development must be of a high quality design and incorporate durable materials, adhering to the same space and amenity standards as market housing. To promote inclusive and mixed neighbourhoods and communities it is imperative that affordable housing is designed to be 'tenure blind' and 'tenure neutral, in accordance with the Government's National Design Guide, so that it is indistinguishable from other types of housing. Affordable housing must also be sensitively integrated into the site and its surroundings to ensure that all local residents, irrespective of tenure type, are provided with high quality living environments and are able to benefit from shared access to all on-site amenities.

Vacant Building Credit

~~7.45.~~7.38. Vacant Building Credit (VBC) was introduced by the Government, in 2014, as a way to incentivise development on brownfield sites. It is a material consideration in planning decisions. VBC applies to sites where a vacant building is brought back into lawful use, or is demolished to be replaced by a new building. Notably, VBC reduces the requirement for affordable housing contributions, taking into account the amount of vacant floorspace being brought back into use or redeveloped. This can have significant implications in the Borough where there is a demonstrated strategic need for affordable housing.

~~7.46.~~7.39. Application of the VBC is not considered appropriate in Lewisham. Monitoring indicates a strong rate of housing delivery locally, with the Borough exceeding its cumulative London Plan housing target since the adoption of the Core Strategy in 2011. Further, there is a pipeline of committed sites (with planning consent) and

[76] National Planning Practice Guidance. First Homes Guidance. Published 24 May 2021 with subsequent updates.
[77] Greater London Authority. First Homes Practice Note (July 2021).

allocated future development sites, all of which are on brownfield land. Accordingly, brownfield sites are coming forward irrespective of the VBC and we do not consider that this additional incentive is necessary, particularly in an inner-London context where the relatively high land values help to support the viability of residential led schemes. Where proposals involve the use of VBC, evidence must be provided to demonstrate that there are exceptional circumstances in which to justify its application, having regard to the tests and requirements set out in this policy.

~~7.47.~~7.40. It should be noted that if an applicant is claiming that a scheme qualifies for VBC, it cannot also claim Community Infrastructure Levy relief through the vacancy test.

HO 4 Housing estate maintenance, renewal and regeneration

A. The maintenance, renewal and regeneration of Lewisham's housing estates will play an important role in helping to ensure that neighbourhoods and communities benefit from high quality living environments, housing is maintained at a decent standard and new genuinely affordable housing is delivered locally.

B. ~~Where strategic~~ Development proposals involving housing estate renewal and regeneration ~~is proposed this will~~must 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, in order to ensure:
   a. There is no net loss of affordable housing, and an uplift in genuinely affordable housing is delivered wherever possible;
   b. A range of high quality, genuinely affordable housing options are made available in the Borough;
   c. Existing and new residential units achieve the Decent Homes standard;
   d. The development is ~~designed to~~of a high quality ~~standard~~ design and provides for demonstrable physical improvements to the housing estate and local area environment, consistent with other Local Plan policies; and
   e. Strong and inclusive communities can be better fostered and supported, with spaces and facilities that enhance opportunities for social interaction and integration.

Explanation

~~7.48.~~7.41. We are committed to ensuring that all Lewisham residents have access to a decent home that is secure and affordable. This will require that significantly more new genuinely affordable housing is made available in the Borough. Also, that existing residences are brought up to and maintained at an appropriate standard, particularly within Lewisham's housing estates. In addition, it is vital for the safety and security of residents and the wider community that homes are well integrated into their neighbourhoods, with plentiful opportunities for social interaction, and that high quality living environments benefit the health and well-being of local residents.

~~7.49.~~7.42. The Decent Homes programme provides one mechanism for housing improvement and has been successfully delivered across the Borough. However, funding is limited and this type of investment may not always be feasible or viable for some houses or estates. For example, the existing condition or orientation of buildings can act as a practical constraint to refurbishment works. Nonetheless the Council has a strong record in this regard, and through Lewisham Homes, the proportion of residential units meeting the Decent Homes standard increased from 41 per cent to 94 per cent in the 10-year period from 2007.

~~7.50.~~7.43. 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. Some older estates constrain opportunities for site or area wide improvements. For instance, their layout or design makes it difficult to introduce safer access points and through routes, more useable amenity space or public realm enhancements. In other circumstances, there may be options to deliver more affordable housing units on estates, either through incremental infill or comprehensive redevelopment. Accordingly, strategic approaches to estate renewal and regeneration may be necessary in certain circumstances.

~~7.51.~~7.44. The nature of the programme for housing estate maintenance, renewal and regeneration will vary on a case-by-case basis. This policy will help to ensure that that all such investment is appropriately managed, irrespective of the level of works involved, and that local residents ultimately benefit from improved access to high quality, inclusive and genuinely affordable housing and living environments.

~~7.52.~~7.45. All ~~strategic~~ estate renewal and regeneration schemes ~~will~~ must be carried out in consultation with existing residents and the local community. The process will be in line with the London Mayor's Good Practice Guide to Estate Regeneration (2016), or future equivalent, and the Council's ~~latest adopted~~ Statement of Community Involvement. ~~In line with Policy HO 1 (Meeting Lewisham's housing needs) A~~all development proposals for estate renewal and regeneration must ensure that there is no net loss of affordable housing, in line with other Local Plan policies. Loss of existing affordable housing will only be ~~supported~~ permitted where it is replaced by equivalent or better quality accommodation, providing at least an equivalent level of affordable housing floorspace, on an identical or equivalent basis.[78] Floorspace is used as the measure for replacement provision as this provides flexibility for the Council and its partners to better address acute housing needs, such as for more family sized social housing, where redevelopment is undertaken. This approach is consistent with ~~that provided in~~ the ~~draft~~ London Plan.

[78] Affordable housing floorspace must be replaced on an identical basis where a tenant has a right to return. Where there is no right of return affordable housing must be replaced on an identical or equivalent basis, i.e. social rented floorspace may be replaced with social rented floorspace or by general needs rented accommodation with rents at levels based on that which has been lost.

HO 5 High quality housing design

A. High quality design is integral to ensuring housing that meets the diverse and changing needs of Lewisham residents over their lifetimes. All new housing development should provide adequately sized rooms and spaces with comfortable and functional layouts along with well integrated amenities. This includes proposals for new build housing development, changes of use, alterations and extensions.

B.A. Proposals for new housing development must meet, and wherever possible seek to exceed, the housing standards set out in the London Plan, including the minimum standards for:

a. Private internal space, having regard to:

i. Internal floor area and built in storage area;

ii.i. Bedroom size;

iii.i. Ceiling height

b.a. Private outside space, having regard to:

i. Outside space adequate for the intended number of occupants;

ii.i. Minimum depth and width of balconies or other private outdoor spaces;

c.a. Communal amenity space; and

d.a. Children's play space, having regard to Policy CI 3 (Play and informal recreation).

C.A. Development proposals for new housing must address the qualitative design aspects set out in draft London Plan Policy D4 (Housing quality and standards) and corresponding Table 3.2, covering the detailed considerations for:

a. Layout, orientation and form;

b.a. Outside amenity space; and

c.a. Usability and ongoing maintenance.

D.A. Housing development should be designed to be inclusive, accessible and safe to all, having regard to the requirements of Policy QD2 (Inclusive and safe design).

E.A. Housing development should protect and enhance amenity of building occupants, as well as that of adjoining site users and uses, in line with Policy QD7 (Amenity).

F.A. Housing development must be designed to be 'tenure blind' to ensure that houses across all tenures are indistinguishable from one another in terms of quality of design and materials, space standards, access and amenity provision.

G.A. Housing development should maximise the provision of dual aspect dwellings. Proposals for single aspect dwellings will be resisted and should only be considered in exceptional circumstances, where it can be suitably demonstrated that it will provide for a more appropriate design solution than a dual aspect dwelling, having particular regard to:

a. Building layout and orientation;

b.a. Outlook for occupiers;

c.a. Microclimate management including for heating, cooling and ventilation; and

d.a. Amenity including adequate privacy and protection against exposure to odour, noise, light and air pollution.

Explanation

7.53.1.1. Everyone should have access to a decent and secure home that is adaptable to one's changing needs over their lifetime. We will seek to ensure that all new housing development, irrespective of tenure, is designed to a high quality standard and meets the diverse needs of Lewisham's resident population. This includes new build housing, as well as proposals involving the alteration or extension of existing housing units, as well as conversion of other buildings into housing.

7.54.1.1. The quality and standard of housing is a key issue in Lewisham. One in four residents now live in the private rented sector, which is double that of 15 years ago. We estimate that a quarter of private rented properties are non-decent. As further evidence, between January 2015 and October 2018 the Council received over 2,000 complaints about the condition of private rented properties. We inspected all these properties and found around half of them had poor energy efficiency (rating of D or below). Whilst the proportion of social housing units meeting the Decent Homes standard increased from 41% to 94% in the ten years from 2007, the Council's own research suggests private sector housing is not achieving the same level of standards.[79]

7.55.1.1. We will apply the London Plan space standards when considering housing proposals (including for internal and outside space, communal amenity space and children's play space). We will also have regard to the qualitative design aspects set out in draft London Plan Policy D4, along with other Local Plan policies. Applicants are advised to refer the London Plan for further details. Development proposals must meet and should seek to exceed the minimum standards.

7.56.1.1. Housing developments should seek to maximise the provision of genuinely affordable housing. They should also support inclusive neighbourhoods and communities by ensuring that housing of all tenure types are designed to a high quality standard and well-integrated, both within the development and with neighbouring residential properties. Housing should be designed to be 'tenure blind' so that units are similar in external appearance, with entrances and access routes that promote social inclusion. Communal amenity spaces must be accessible to all residents of the development, regardless of tenure.

Dual aspect dwellings with opening windows on at least two sides have many benefits for the amenity of building occupiers, including for daylight, outlook and natural ventilation. Single aspect dwellings do not offer the same benefits, particularly for natural ventilation, which is problematic in terms of climate change

[79] Lewisham Housing Strategy 2020-2026. Lewisham Council

~~adaptation. Single aspect dwellings will therefore only be acceptable in exceptional circumstances, and should be avoided where they are north facing, contain three or more bedrooms, or exposed to noise and air pollution levels above which significant adverse effects on health and quality of life occur. The design of single aspect dwellings must demonstrate that all habitable rooms and the kitchen are provided with adequate passive ventilation, privacy, daylight and outlook, and that the unit's microclimate will be appropriately managed.~~

Commented [NE237]: Moved to High Quality Design section – now Policy QD8

HO ~~6~~5 Accommodation for older people

A. The housing needs of older people will be met mainly through conventional residential accommodation in the C3 Use Class that is designed in a way that allows for easy adaptation to the different needs of users over their lifetime. ~~, whether through~~This includes new build development ~~or~~ and the appropriate retrofitting of housing units. Specialist older person's accommodation and care home accommodation should supplement conventional housing to meet the ~~varying requirements~~needs of Lewisham's older resident population.

Commented [NE238]: Included to aid policy implementation

Specialist older person~~'~~s accommodation

B. Development proposals for specialist older person~~'~~s accommodation will only be supported where they ~~address an unmet local housing need and~~:
   a. Respond positively to the objectives in Lewisham's Housing Strategy;
   b. Make provision for a mix of tenure types including affordable housing~~, in line~~ with reference to Policy HO3 (Genuinely affordable housing);
   c. Make p~~P~~rovision of accessible housing, in line with Policy QD2 (Inclusive and safe design);
   ~~c.~~d. Are sited at well-connected locations that are ~~easily accessible to~~well-served by public transport~~,~~ and provide for good access to ~~shops, services, leisure and~~ community facilities and services (including health and social care) appropriate to the intended occupiers;
   ~~d.~~e. Are ~~designed to~~of a high quality ~~standard~~ design with fit for purpose accommodation and facilities suited to occupiers, staff and visitors, giving consideration to:
      i. The level of independence of occupiers and corresponding level of managed care provision or support;
      ~~ii.~~i. ~~Provision of accessible housing, in line with Policy QD2 (Inclusive and safe design);~~
      ~~iii.~~ii. Private, communal and public amenity space; and
      ~~iv.~~iii. Access, parking and servicing arrangements, including for all types of vehicles expected to access the development.

Commented [NE239]: Amended to provide more flexibility for this type of housing to be delivered.

Commented [NE240]: Moved to B.c above

~~C. All proposals for specialist older person's accommodation must demonstrate that residents will be sufficiently supported by community infrastructure (such as heath and leisure facilities) that is easily accessible from the site, taking into account the mobility requirements of the intended occupants, and can cope with new demand arising from the development.~~

Commented [NE241]: Respond to consultation – requirement is considered too onerous and could preclude the delivery of older persons accommodation, along with putting additional pressure on neighbouring boroughs.

Care home accommodation

~~D.~~C. Development proposals for care home accommodation in the C2 Use Class will only be supported where they are appropriately located and ~~designed to~~of a high quality ~~standard~~ design, having regard to ~~the requirements of~~ Policy HO6.B ~~(c-d-e) and HO6.C~~. In addition, development proposals must ensure that 100 per cent of habitable rooms are wheelchair accessible.

Loss of specialist older persons and care home accommodation

~~E.~~D. Development proposals that will result~~ing~~ in the net loss of floorspace for specialist older person~~'~~s or care home accommodation will be ~~resisted~~ refused unless it can be demonstrated that:

a. There is a long-term surplus of ~~the specific~~ this type of accommodation in Lewisham (i.e. there is no unmet local need); or
b. Adequate replacement provision will be provided~~, whether~~ on-site or elsewhere within the Borough; ~~and~~or
c. The existing accommodation is not suitable to support the intended occupants in its current condition and/or is incapable of being maintained at an acceptable modern standard.

~~F.~~E. Where the loss of specialist older person~~'~~s or care home accommodation is acceptable in line with (D) above, development proposals ~~will be expected to~~must secure the re-provision of an equivalent amount of floorspace for residential use, ensuring no net loss of affordable housing, and provide ~~including~~ new affordable housing, where appropriate.

~~Care home accommodation~~

~~G.~~A. ~~Development proposals for care home accommodation will be supported where they are appropriately located and designed to a high quality standard, having regard to the requirements of HO6.B(c-d) and HO6.C. In addition, proposals must ensure that 100 per cent of habitable rooms are wheelchair accessible.~~

~~H. In order to ensure inclusive and mixed neighbourhoods and communities, development proposals must not result in a harmful overconcentration of care home accommodation within the locality.~~

Explanation

~~7.57.~~7.46. ~~The number of older people in Lewisham is projected to increase significantly over the coming years. There was an estimated 40,400 people aged 65 and older in 2018 and this is projected to rise almost 50% in the next 15 years, up to 60,200 people by 2033[80]. This is largely driven by the increase in the population aged 60-74, although there is also expected to be significant gains in the proportion of those aged 80 and above.~~ The number of people in the Borough aged 65 and over is forecast to rise by 71.5 per cent over the plan period, and by 2040 there

~~[80] Lewisham SHMA (2019)~~

Commented [NE242]: Amended to ensure conformity with the London Plan.

Commented [NE243]: This criterion has been re-ordered within the policy – see C above..

Commented [NE244]: Respond to consultation - requirement is considered too onerous and could preclude the delivery of care home accommodation, along with putting additional pressure on neighbouring boroughs.

will be an additional 21,074 residents in this age category.[81] We are committed to ensuring that a wide range of high quality and affordable housing options are available to older people. This includes accommodation for those seeking to remain in their homes[82], downsize from larger homes whilst remaining in the area, or people requiring more tailored, specialist accommodation with elements of support or care.

~~7.58.~~7.47. ~~Current and future~~Local needs for older person~~'~~s accommodation should be met principally through conventional housing. Where this is a good level of this type of provision available in the Borough~~,~~ there will be less reliance on specialist forms of ~~older person's~~ accommodation. ~~We will therefore expect that~~ A~~a~~ll new residential development in the C3 Use Class ~~is~~ must therefore be designed to be adaptable to the varying needs of users at all stages of life, in line with Policy QD 2 (Inclusive and safe design). We will also encourage the retrofitting of existing residential buildings and units to better suit the day-to-~~date~~ day needs of older people, including by making them wheelchair adaptable or accessible. All proposals for retrofitting must ensure compliance with other Local Plan policies, particularly those on the historic environment. Internal or external alterations have the potential to harm the significance of heritage assets or otherwise impact on local character~~, and this should be considered early in the planning and design process~~.

~~7.59.~~7.48. The Lewisham SHMA (~~2019~~2022) indicates that there are a number of housing options available for older people in the Borough, including some ~~3,500~~ 3,200 units of specialist accommodation with integrated elements of support or care. This provision is helping to meet the varying types of need, but it is recognised ~~some~~ additional capacity is required~~may need to come forward given the expected future growth in the Borough's older person population~~. ~~The draft London Plan sets an indicative annual benchmark for the Borough of 100 units of specialist accommodation, and this should be considered in the context of more detailed local assessments of specific types of need.~~The total additional need for specialist older person dwellings across Lewisham is projected to be 2,422 by 2040. This is broken down to 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.

~~7.60. We are broadly supportive of proposals for non-specialist forms of conventional housing in the C3 Use Class that are designed to be adaptable to the different needs of occupants over their lifetime, and therefore offer greater choice to older people. However, it is recognised that some people may choose or require specialist older person's accommodation. Proposals for such specialist accommodation will be supported where there is a demonstrable local need,~~

Commented [NE245]: Updated to reflect findings of Lewisham SHMA 2022.

Commented [NE246]: Updated to reflect findings of Lewisham SHMA 2022.

[81] Lewisham SHMA (2022).
[82] The Lewisham SHMA cites a national database which suggests that more than three-quarters of older people want to remain in their current home with help and support when needed.

having regard to the Lewisham SHMA (2019) and the Council's Housing Strategy, and other policy requirements are satisfied.

7.61.7.49. The draft London Plan discusses the range of accommodation options that are available to older people. It clearly distinguishes between specialist older person's accommodation and care home accommodation. Applications must state the use for which planning permission is sought. We will establish tThe nature of development proposals having regard towill be established based on the definitions and attributes of specialist and care home accommodation set out in the draft London Plan, and consider proposals accordingly. For the avoidance of doubt, where the London draft Plan policy H13 (Specialist older persons housing) applies to a development proposal, then Local Plan policies H06 (B-E) will also apply.

7.62.7.50. Where a development proposal does not meet the attributes of specialist older person's accommodation or care home accommodation set out in the London Plan, then the general housing policies in the London Plan and Local Plan will apply.

7.63. Specialist accommodation should provide for a range of tenure types, including affordable housing. The needs of older people vary depending on their personal financial circumstances. Furthermore, need varies based on an individual's level of independence and the support they require. This policy seeks to ensure provision for a wide range of housing products to meet the different needs of older people in the Borough.

7.64. In assessing proposals for specialist older person's accommodation and care home accommodation we will give consideration to affordability and financial support available to the intended occupant group. It is acknowledged that arrangements for assessing affordability to people of pensionable age will be different to people of working age, especially when housing includes an element of care.

7.65.7.51. Specialist older person's accommodation and care home accommodation must be sensitively integrated into Lewisham's neighbourhoodss, at well-connected and accessible locations that are well-connected by public transport, and within easy reach of community facilities and services. Residents, carers and visitors should benefit from easy safe and convenient access to and from the site as well as the surrounding area. Developments should include accessible pathways and gradients to enable residents to move with relative ease whether by walking or with the use of aids, such as wheelchairs or mobility scooters. Accessibility is vital to ensuring schemes the development adequately responds to the mobility needs of occupiers. It is also important to promote independence and facilitate social interaction, which in turn can help to prevent againstaddress isolation and loneliness, which is a key public health issue.

7.66. For facilities to be easily accessible they should generally be located at a distance of no more than 400 metres away from public transport, shops, services and other

Commented [NE247]: Respond to consultation – requirement to demonstrate identified need for care home accommodation considered too onerous; criterion B above and supporting text deleted.

Commented [NE248]: Respond to consultation – removed as this infers that suitability of accommodation is linked to level of financial support available to an individual

~~community facilities. The locality should also feature accessible pathways and gradients, enabling residents to travel to and from the site with relative ease whether by walking or through the use of aids, such as wheelchairs or mobility scooters. One of our key objectives is to ensure that neighbourhoods are made more liveable and inclusive to all, including through the delivery of a high quality public realm. This policy will work in tandem with other Local Plan policies to positively address the needs of people at all stages of their life.~~

~~7.67.~~7.52. ~~Specialist older person's accommodation and care home accommodation should be well integrated into the site and its wider surroundings, with careful consideration given to layout and design. Where appropriate,~~ Development proposals should be designed with reference to inclusive and safe design principles, taking into account the latest industry good practice guidance. They should promot~~e~~e and adequately respond to ~~requirements for~~ the sharing or joint use of facilities, particularly to encourage a sense of community belonging. Development should also be designed to ensure a good fit between the facilities supplied and the specialist needs of the intended occupants. This includes consideration for the level of managed care provision and support required by occupants, along with the need for high quality facilities such as amenity space ~~(private, communal and public),~~ storage, and space for charging of mobility scooters~~.~~, ~~as well as~~ Developments must also make adequate provision for access, ~~and~~ parking and servicing for ~~the~~ vehicles ~~expected at the site~~, with drop-off points for~~such as~~ taxis, mini-buses and ambulances located near the building's principal entrance.

~~7.68. Residential accommodation will be expected to meet the latest industry standards. We will require applicants to ensure development is informed by the latest good practice guidance. Planning statements should refer this guidance and clearly indicate how this has been taken into consideration.~~

~~We will seek to protect against the loss of floorspace for specialist older person's accommodation and care home accommodation. Proposals involving the loss of change of use of such housing must suitably demonstrate that there is not a long-term local need for the type of provision in question, or that adequate replacement provision will be provided within the Borough. Furthermore, there should be clear evidence that the existing facility is not suitable to support the intended occupants in its current condition and/or is incapable of being maintained at an acceptable modern standard.~~

~~7.69. When considering redevelopment for self-contained housing, we will have regard to the criteria set out in Policies HO 1 (Meeting Lewisham's housing needs) and HO 3 (Genuinely affordable housing), and any need to generate funding for replacement specialist accommodation elsewhere. If replacement housing is provided elsewhere we will consider the proportion of affordable housing provided across both sites. Proposals for redevelopment for non-residential uses will be resisted, and the Council and will seek to retain existing affordable housing, consistent with other Local Plan policies.~~

Commented [NE249]: Respond to consultation – Policy and supporting text amended to provide more flexibility for location of care home and specialist accommodation, whilst retaining principle that development must be in a well-connected location. Parts of this supporting text incorporated into paragraph above.

Commented [NE250]: Reference to good practice guidance included in amended paragraph 7.50 above.

HO ~~7~~6 Supported and specialised accommodation

A. Development proposals for supported and specialised accommodation ~~(including residential hostels and secured accommodation)~~ will only be supported where they:

a. Meet an identified need for the type of accommodation proposed;

~~b. Do not result in the net loss of existing permanent accommodation;~~

~~c.~~b. Make provision for a mix of tenure types including affordable housing, where appropriate, ~~in line~~ with reference to Policy HO3 (Genuinely affordable housing);

c. ~~Contribute to~~Support mixed and ~~balanced~~ inclusive neighbourhoods and communities without leading to a ~~proliferation or~~ harmful overconcentration ~~of this type~~ of supported or specialised accommodation ~~in the locality~~. This will be assessed where the character of the area has changed or local amenity has been adversely impacted as a result of:

i. Visual amenity;

ii. Increased noise;

iii. Vehicular traffic generation, along with car and cycle parking pressure;

iv. Inadequate provision of waste management and recycling facilities;

v. Additional pressure on community facilities; and

~~i.~~vi. Anti-social behaviour and public safety; ~~and~~

d. Are appropriately located in areas ~~and designed giving consideration to:~~that are well-connected to services and facilities that are likely to be required by the occupiers; and

~~d.~~e. Are of a high quality design, giving consideration to the:

~~i. Accessibility to public transport, services and community facilities;~~

~~ii.~~i. Intensity of use that is appropriate to the size of the development;

ii. Integration of a~~A~~ccommodation and facilities ~~that are suited to~~for the specific use or~~site occupiers and users~~ group it is intended for;~~,~~

iii. ~~including~~ Suitable arrangements for managed care or supervision, security and community safety; and

iv. Protection of the amenity of adjoining and neighbouring uses.

B. Development proposals that will result~~ing~~ in the net loss of floorspace for supported or specialised accommodation will be ~~resisted~~ refused unless it can be suitably demonstrated that:

a. The specific type of accommodation is no longer required for the particular use and/or group, or other relevant groups in need of supported housing; or

b. Adequate replacement provision will be provided; ~~and~~or

c. The existing accommodation is not suitable for the support or care of the intended occupants in its current condition and format and/or is incapable of being maintained at an acceptable standard.

C. Where the loss of accommodation is acceptable in line with (B) above, development proposals ~~will be expected to~~must secure the re-provision of an equivalent amount of floorspace for residential use, including an element of affordable housing, where appropriate.

Commented [NE251]: Removed as considered too onerous – could preclude the delivery of supported and specialised accommodation (i.e. conversion of housing)

Commented [NE252]: Additional criteria included for clarity and to aid policy implementation

Commented [NE253]: This is now covered in criterion A.e above.

Explanation

7.70.7.53. It is important that people from vulnerable groups areeveryone provided withhas access to a decent and secure home accommodation, whether for temporary stays or longer-term periods. Supported and other forms of specialised accommodation offer respite and provision of care or support for individuals with distinct needs, particularly those from more vulnerable groups, whether for temporary stays or longer-term periods. This includes people coping with physical or mental health issues, disabilities, impairments and other vulnerabilities, or those who are in transition and require support, such as refugees. The London Plan includes a detailed list of groups for whom supported and specialised accommodation is suited.[83] Supported accommodation can take a variety of forms and fall into different Use Classes, depending on the nature of use and type of care or supervision required.

7.71.7.54. In line with the Corporate Strategy, which aims for the Borough to be a welcoming place of safety for all, and also building on Lewisham's role as a 'Borough of Sanctuary'[84], the Local Plan objectives to deliverbroadly supports development proposals involving the retention, refurbishment and delivery of supported and specialised accommodation. inclusive communities, we are generally encouraging of supported housing where it clearly addresses Applications should clearly set out how the development will assist in meeting an identified need for the use proposed., is well designed and sensitively integrated into the locality. It is vital that development the accommodation is appropriate to for the intended use and end usersgroup(s) for which it is intended, so that the specific type of managed care or supervision required can be effectively delivered effectively. Applicants are encouraged to design schemes through active engagement with relevant health and social care providers or stakeholders, wherever possible through the design-led approach. In order to contribute to the achievement ofsecure mixed and balanced inclusive neighbourhoods and communities, development proposals should not result in an harmful overconcentration of similar uses within an area,. particularly where this would adversely impact on amenity, community safety or local character.

7.72.7.55. Existing supported housing should be protected retained and maintained to a decent standard.where it is in a suitable condition and need exists, whether for the specific group it is currently serving or other vulnerable groups. Development proposals involving the change of use or loss of accommodation on the basis of HO6.B.a above must consider nNeed should be considered at both the local and sub-regional level, recognising that delivery of provision for certain types of uses or groups may require involve coordination of stakeholders across Lewisham and its neighbouring authorities. Proposals involving the loss of change of use of supported accommodation must sufficiently demonstrate that the existing provision is no longer required or that adequate replacement provision will be secured. Furthermore, there should be clear evidence that the existing facility is

[83] London Plan (2021), Policy H12 Supported and specialised accommodation.
[84] Lewisham has been recognised as a Borough of Sanctuary by the national charity 'City of Sanctuary', and as has been awarded the title of 'Council of Sanctuary' in May 2021.

Commented [NE254]: Policy supporting text amended throughout to make more concise.

Commented [NE255]: Factual update and to aid policy implementation

Commented [NE256]: Amended to reflect that policy supports Lewisham's role as a Sanctuary Borough.

~~not suitable to support the intended occupants in its current condition or is incapable of being maintained at an acceptable modern standard.~~

~~7.73. Where it is accepted that an existing site or property is no longer appropriate for supported accommodation, we will seek to ensure that there is no net loss of residential floorspace. When considering redevelopment for self-contained housing, we will have regard to the criteria set out in Policies HO1 (Meeting Lewisham's housing needs) and HO3 (Genuinely affordable housing). Proposals for redevelopment for non-residential uses will be resisted, and the Council will seek to retain existing affordable housing, consistent with other Local Plan policies.~~

Commented [NE257]: Repetition – these points included in policy above

HO ~~8~~7 Purpose built student accommodation

A. Development proposals for Purpose Built Student Accommodation (PBSA) will only be supported where ~~they~~it is demonstrated that:
   a. They h~~H~~elp to meet an identified ~~strategic~~ need for this type of housing~~,~~ (giving priority to the local ~~need~~student population), will not compromise delivery against the Borough's strategic housing target and principal need for conventional housing, and will not result in a harmful overconcentration of PBSA taking into account~~:~~;
      i. The amount of PBSA within the Borough and the area within which the development is proposed, having regard to past delivery and consented but undelivered PBSA;
      ~~i.~~ii. The proportion of PBSA provided in relation to the overall mix of housing within the development, and where relevant a masterplan or site allocation;
   b. ~~Ensure that T~~the accommodation is secured for use by students, as demonstrated by an agreement with one or more specific higher education ~~institutions~~ provider(s); and
   c. ~~Make provision for~~ The maximum level of accommodation is secured affordable student accommodation, in line with ~~draft~~ the London Plan ~~Policy H17 (Purpose built student accommodation); and~~.
   ~~d. Do not compromise the delivery of the Borough's strategic requirements for conventional housing.~~

Commented [NE258]: Amended in response to findings of SHMA 2022 and to provide greater clarity on considerations of housing mix, harmful overconcentration of PBSA

B. Development proposals for PBSA must be appropriately located:
   a. At well-connected sites that ~~have good levels of public transport accessibility and~~ are easy to access by walking~~,~~ ~~and~~ cycling and public transport;
   b. Within or at the edge of town centres, or other locations that benefit from good provision of shops, services, leisure and community facilities appropriate to the student population; and
   ~~c. To support To contribute to mixed and balanced inclusive neighbourhoods and communities:~~
   ~~Without leading to a proliferation or harmful overconcentration of student accommodation in the locality; and~~
      i. Giving priority to sites located in proximity to the education ~~institution(s)~~facility the development is intended to serve, or other higher education institutions in the Borough.

Commented [NE259]: Criteria absorbed into A above

C. Development proposals for PBSA ~~should be well-designed, sensitively integrated into the locality and ensure a high standard of amenity for student occupiers. All proposals will be expected to ensure:~~must be of a high quality design, giving particular consideration to:

a. ~~A high quality living environment with a~~Adequate functional living space and layout~~,~~ with good-sized bedrooms and well~~-~~integrated communal areas and facilities, with a recommended benchmark of 1 square metre of internal and 1 square metre of external communal amenity space per student bed;
b. Inclusive and safe design, including p~~P~~rovision for wheelchair accessible accommodation, spaces and facilities~~, in line with Policy QD2 (Inclusive and safe design)~~;
c. Amenity of occupiers and neighbouring properties ~~Amenity considerations are integral to the design-led approach (~~including consideration for outlook, daylight and sunlight, noise ~~impacts~~ and ventilation~~)~~;
d. Adequate on-site cycle parking facilities;
e. ~~The a~~Accommodation that is suitable for year-round occupation.~~; and~~
~~f. Protection of the amenity of adjoining and neighbouring uses.~~

D. All development proposals for PBSA must be accompanied by a site management and maintenance plan, to be secured by planning condition.

E. Development proposals involving t~~T~~he loss of ~~existing Purpose Built Student Accommodation~~PBSA will be ~~resisted~~ refused unless it can be suitably demonstrated that:

a. There is no local need or demand for student accommodation to serve the existing or another higher education institution in the area; or
b. Adequate replacement accommodation ~~can~~ will be provided in an appropriate location accessible to the higher education institution it serves.

F. Where the loss of PBSA~~accommodation~~ is acceptable in line with (E) above, development proposals ~~will be expected to~~must secure the re-provision of an equivalent amount of floorspace for residential use, including an element of affordable housing, where appropriate.

Explanation

~~7.74. High quality and affordable Purpose Built Student Accommodation (PBSA) is necessary to cater for the needs of London's student population. The majority of the Capital's existing PBSA is concentrated in central London, especially in the Boroughs of Camden, Islington, Tower Hamlets and Southwark. In order to improve access and prevent against the overconcentration of this type of use, the draft London Plan seeks to redress the distribution of provision across the region.~~

~~7.75.~~7.56. ~~Whilst recognising there are student accommodation needs associated with education providers throughout London, we will aim to address local needs as a priority.~~ Lewisham is home to a number of further and higher education institutions. This includes Goldsmiths College at New Cross, Trinity Laban

Commented [NE260]: Policy amended throughout for clarity and to aid implementation.

Commented [NE261]: Amenity now covered in C.c above

Commented [NE262]: Repetition – the London Plan provides information on spatial distribution of PBSA in London

Conservatory of Music and Dance at Deptford, and Lewisham College at Deptford Bridge and Lewisham Way. Greenwich University in the Royal Borough of Greenwich is also located nearby. It is important that Lewisham's student population is able to access affordable accommodation, ideally in proximity to the places where people take up studies. PBSA can therefore play a role in meeting local housing needs. ~~Furthermore, provision of PBSA~~It also has the ~~added~~ benefit of relieving pressure on the private rented market, enabling opportunities for others to access housing that might not otherwise be available. The Lewisham SHMA (2022) indicates that more than 1,000 dwellings were wholly occupied by students in 2021. In addition, PBSA can benefit Lewisham's neighbourhoods and communities, for example, by attracting a student population that supports the local economy, complements the creative and cultural industries and stimulates inward investment.

~~7.76.~~7.57. ~~We will take a positive view on proposals for new PBSA where there is an identified local or strategic need for this type of accommodation, and there are assurances that the development will be secured for student use. This general support is provided recognising that the Borough's main strategic requirement is for genuinely affordable, conventional housing.~~ PBSA is defined as non-conventional housing, which for purposes of delivery against the Borough's strategic housing target, is counted on a 2.5:1 basis (i.e. two and a half bedrooms/units is equivalent to one unit of housing). Compared with conventional housing, where units are counted on a 1:1 basis, student accommodation may not always provide the most optimal use of land or contribute to addressing the Borough's most pressing housing needs. ~~We will resist proposals where it is considered that student accommodation will compromise or suppress delivery of conventional housing, for which need is greatest locally. This includes consideration of proposals for PBSA that would result in the net loss of existing housing units.~~The Lewisham SHMA points to the significant amount of PBSA recently delivered in the Borough including the proliferation of off-campus accommodation. Some 1,686 units were delivered and consented from 2016 to 2021, or an average of 337 per year. Additional student bedspaces have been consented since then. The London Plan sets out an overall target for London of 3,500 PBSA units per annum across all boroughs. In this context, Lewisham is making a significant contribution to meeting London's needs for PBSA. A carefully managed approach to additional capacity is therefore required. Development proposals must clearly demonstrate that the provision will not lead to a harmful overconcentration of PBSA. It is also critical that they do not compromise or suppress the delivery of conventional housing, for which need in Lewisham is greatest. The London Plan makes clear that meeting the requirement for PBSA should not undermine policy to secure mixed and inclusive neighbourhoods.[85]

Commented [NE263]: Repetition – these points are covered in the policy

Commented [NE264]: Captured below, paragraph rephrased

~~7.77.~~7.58. New PBSA must be developed and secured for occupation by students of one or more specific higher education institutions. This is to guard against speculative development and ensure proposals genuinely help to address identified need. Applications must provide evidence of an end user affiliated with an educational

[85] London Plan. 2021. Policy H15 (Purpose built student accommodation), paragraph 4.15.2.

~~institution~~provider.~~,~~ They must also~~and~~ demonstrate appropriate management arrangements are in place so that rooms will be rented solely to students over the lifetime of the development, including an identified landlord, agent or management company. ~~Consistent with the draft~~ The London Plan ~~Policy H17,~~makes clear that if the accommodation is not secured for use by students and for occupation by members of one or more specified higher educational institutions, development is not considered PBSA and will be considered against policies on shared housing and communal living~~, including HO8 (Housing with shared facilities)~~.

~~7.78.~~7.59. ~~Draft~~ The London Plan ~~Policy H17~~ provides that at least 35% of PBSA should be secured as affordable housing. This is in order to ensure that students with an income equivalent to that provided to full-time UK students by state funded sources of financial support for living costs can afford to stay in PBSA. We will apply the definition of affordable student accommodation as set in the ~~draft~~ London Plan and its supplementary guidance. London Plan policy H15 (Purpose built student accommodation) sets out requirements regarding the delivery of affordable student units, including circumstances in which the Fast-Track Route or Viability Tested Route may be taken, and should be referred for further information. Affordable rent levels may be subject to periodic review over the life of the Local Plan, taking into account any significant changes that may be made to the Government's student maintenance loan regime.

Commented [NE265]: Respond to consultation – local plan should provide more details on London Plan approaches to delivery of affordable student bedspaces

~~7.79.~~7.60. New PBSA should be directed to well-connected and highly accessible locations~~, including those supported~~ that benefit from ~~by~~ good provision of walking routes and ~~cycling routes~~ cycleways, and are within easy reach~~infrastructure. It is also important that PBSA is sited so student residents have access to a wide range~~ of services and facilities. During the site selection process applicants should give priority to locations in proximity to the institutions that the development will serve. PBSA that is intended to meet need arising from outside of the Borough should be sufficiently justified in respect of the site location~~, both locally and in the individual site context~~.

~~7.80.~~7.61. New PBSA must be of a high ~~standard of~~ quality design and construction, with functional layouts and well~~-~~integrated living and communal spaces and facilities. Developments should make provision for communal amenity space taking into account the recommended benchmark of 1 square metre internal and external communal amenity space per student bed. This is particularly important in the absence of national or regional policy requirements or standards for private external amenity space in PBSA. Development proposals should use the design-led approach to demonstrate that the amount of communal amenity space is appropriate to the site. It should meet the latest industry standards as demonstrated through the use of Accreditation Network UK or other similar scheme. Student bedrooms/units ~~sizes~~ and layouts should be varied~~, particularly~~ to cater to the needs of wheelchair users, mature students with families, students who want to live alone and for groups of students using shared facilities. The specific requirements of educational institutions should be considered and accounted for wherever possible.

~~7.81.~~7.62. Whilst many students require accommodation during term time only, some residents ~~will~~ may need ~~use accommodation as their~~ a permanent ~~address~~ home throughout their studies and development therefore should ~~allow~~ make provision of units for year round occupation. To help ensure the viability of PBSA, we will provide flexibility to allow for the temporary or ancillary use of accommodation during vacation periods or term breaks. Proposals will be considered on a case-by-case basis.~~,~~ ~~and where acceptable in principle, we will use~~Planning conditions or legal agreements will be used to ensure that any temporary or ancillary uses do not result in a material change of use of the building.

~~PBSA can benefit Lewisham's neighbourhoods and communities, for example, by attracting a student population that supports the local economy, complements the creative and cultural industries and stimulates inward investment. However an overconcentration of student accommodation within a local area can adversely impact on the amenity of existing residents and uses, and also undermine objectives for delivering mixed and balanced communities. Where the scale or concentration of student housing is likely to harm local amenity, we will resist proposals or seek a range of mitigation measures to ensure development is appropriate. This may include planning contributions for any additional infrastructure provision required to support the development.~~

Commented [NE266]: Moved to supporting text above

Commented [NE267]: Captured in re-drafted supporting text above para 7.54

~~7.82.~~7.63. Site management and maintenance plans are important to delivering successful student housing schemes. These plans will be required for all new PBSA and will normally be secured as a planning condition. Management plans will be expected to cover matters such as site management and maintenance, on-site wardens, communal facilities, safety and security for occupants and elimination of potential noise nuisance.

~~7.83.~~7.64. We will seek to ~~protect against~~prevent the loss of existing student accommodation. This is particularly to ensure that such loss does not adversely impact on existing capacity or existing residents, whose displacement could create additional pressure on the conventional housing market. However, flexibility will be applied where it can be suitably demonstrated that demand for the provision in question no longer exists. We will encourage the refurbishment of buildings to ensure student accommodation is brought up to an acceptable modern standard. Proposals will be supported where there is adequate re-provision of accommodation and other policy requirements are satisfied.

Figure 7.1 Article 4 Direction on HMOs

HO ~~9~~8 Housing with shared facilities (Houses in Multiple Occupation)

A. Development proposals for ~~new~~ housing with shared facilities (i.e. Houses in Multiple Occupation) (HMOs) in the Sui Generis Use Class will only be ~~supported~~ permitted where they ~~contribute to a beneficial mix and balance of uses within an area and~~:
   a. Do not result in the loss of existing ~~larger~~ housing suitable for family occupation, which includes but is not limited to the following considerations~~;~~:
      i. Location within a residential street or area;

ii. Size and layout, including number and size of individual rooms and bedrooms;

~~i.~~iii. Amenity space, such as access to a private garden;

b. Contribute to inclusive and mixed neighbourhoods and ~~Do~~ do not result in a~~n~~ harmful overconcentration of HMOs ~~in the area~~. This will be assessed where the character of the area has changed or local amenity has been adversely impacted as a result of:

i. Visual amenity, including impacts arising from poorly maintained properties;

ii. Increased noise;

iii. Vehicular traffic generation, along with car and cycle parking pressure;

iv. Inadequate provision of waste management and recycling facilities;

v. Additional pressure on community facilities; and

~~ii.~~vi. Anti-social behaviour and public safety.

~~Do not give rise to adverse impacts on the amenity of the surrounding properties and neighbourhood, including cumulative impacts taking account of other HMOs in the area;~~

~~b.~~c. Are appropriately located in areas ~~of good transport accessibility~~that are well-connected to local services by walking, cycling and public transport; and

~~c.~~d. Are well-designed and provide high quality accommodation that satisfies the relevant standards for HMOs, including units that provide adequate functional living spaces and layouts ~~along with other Local Plan policies, including for internal space standards and amenity space provision~~.

B. Development proposals for small HMOs in the C4 Use Class (i.e. 3 to 6 unrelated people) within any area covered by an Article 4 Direction will only be permitted where ~~they contribute to a beneficial mix and balance of uses within an area and~~:

a. The gross original internal floorspace of the ~~existing~~ original dwelling is 130 square~~.~~ metres or greater; and

b. The requirements of (A)(b-d~~e~~) above are satisfied.

C. Development proposals that result in the loss of an HMO, or the self-containment of any part of an HMO, will be ~~resisted~~ refused unless it can be suitably demonstrated that:

a. The existing building does not meet the appropriate standards for an HMO and has no realistic prospect of meeting the standards; and

b. Adequate replacement provision can be secured within the Borough, having regard to the requirements of (A) above, with no net loss in HMO floorspace; or

c. Any replacement use includes ~~an element of residential~~housing provision that meets an acute local ~~housing~~ need, particularly genuinely affordable housing, with at least the equivalent amount of residential floorspace re-provided~~.~~

Large-scale purpose~~-~~built shared living accommodation

D. Development proposals for l~~L~~arge-scale purpose-built shared living accommodation in the Sui Generis Use Class ~~will generally be resisted as this type of use~~

Commented [NE268]: Amended for clarity and to aid effective policy implementation, taking into account recent planning appeal decisions in the borough

Commented [NE269]: Amended for clarity and to aid effective policy implementation

Commented [NE270]: Amended to appropriately reflect that HMOs are a specialist form of accommodation and do not have the same space standards as conventional housing units; however the policy/supporting text retains the reference to the national HMO standards and Council's licencing scheme

Commented [NE271]: Repetition – this point is picked up in A above.

Commented [NE272]: Policy amended throughout for clarity and to aid effective policy implementation

~~compromises opportunities to deliver conventional housing in the Borough. Development proposals~~ will only be permitted where it is suitably demonstrated that:

a. ~~They meet~~There is an identified local ~~need~~ market demand for the type of housing proposed and the development will not lead to a proliferation of this type of development in an area and the Borough which will compromise the delivery of conventional housing;
b. Private ~~residential~~ units within the development are demonstrably not self-contained ~~accommodation~~ homes in the C3 Use Class or capable of being used as self-contained homes;
c. There is ~~adequate~~ well-integrated provision of communal facilities and services ~~suited~~ sufficient to meet the requirements of the intended number of occupiers;
d. The~~y are~~ development is appropriately located and ~~designed to~~of a high quality ~~standard~~design, having regard to the requirements of (A) above;
e. The development will be under single management, suitably managed and maintained over its lifetime, as evidenced by a management plan;
f. All units are available to rent, with m~~M~~inimum tenancy lengths ~~are available to occupants~~of no less than 3 months; and
g. A cash-in-lieu contribution is made towards affordable housing in the C3 Use Class.

Commented [NE273]: Amended for conformity with the London Plan

Explanation

~~7.84.~~7.65. A house with shared facilities, or House in Multiple Occupation (HMO), refers to a shared house, flat or other non-self-contained dwelling that is the main residence for 3 or more occupiers forming 2 or more households. A household is generally a family (or people with relationships similar to a family), including single persons and co-habiting couples. There are two planning Use Classes for housing with shared facilities. A Use Class C4 HMO is a 'small' HMO used by 3 to 6 unrelated people. A 'large' HMO shared by more than 6 unrelated people is a Sui Generis use.[86]

~~7.85.~~7.66. It is permitted to change a Use Class C4 HMO property to a Use Class C3 dwelling house without planning consent, and vice versa. Therefore, for planning policy implementation we will generally treat small HMOs in the same way as self-contained homes, with legislation controlling changes of use between these Use Classes. Exceptions apply in situations where an Article 4 Direction covers a specified area.

~~7.86.~~7.67. Planning permission is required for the use of land and buildings for large HMOs in the Sui Generis Use Class. Some forms of housing with shared facilities are not considered HMOs in planning terms (for example, Purpose Built Student Accommodation and supported housing) and these are addressed elsewhere in the Local Plan.

[86] The above provides a summary of HMOs and the full legal definitions should be referred as appropriate, as set out in the Town and Country Planning (Use Classes) Order 1987 (as amended). There are separate definitions in respect of the legal licencing of HMOs as set out in the Housing Act 2004 and related secondary legislation.

~~7.87.~~7.68. The London Plan acknowledges the role that HMOs play in London as a strategically important part of the Capital's housing supply, with provision that helps to meet distinct needs and reduces pressure on other elements of the housing stock. ~~In~~ The Lewisham~~,~~ Strategic Housing Market Assessment (2022) indicates that HMOs have contributed to making available a wider range of housing options ~~over time~~and can continue to play a role in meeting local housing needs. ~~. This is especially for low income residents and young people (including those under 35 years of age in receipt of the shared room rate housing benefit) and those requiring temporary accommodation~~. However this type of provision must be carefully managed in order to ensure high quality housing that supports mixed and inclusive neighbourhoods and communities.

Commented [NE274]: Repetition – Groups for whom HMOs help meet need is discussed later in supporting text

Commented [NE275]: Updated to reflect findings of Lewisham SHMA 2022

~~7.88.~~7.69. To ensure that HMOs are built and maintained at an acceptable standard the Council operates mandatory and additional licencing schemes, in accordance with housing legislation. Through this regime we have published the Lewisham Standards for Licensable HMOs. All development proposals for ~~new~~ HMOs ~~will be expected to~~must ensure these standards, or any future equivalent, are met as a minimum, irrespective of associated licencing requirements. The standards should be considered alongside other planning policies to ensure that new housing is fit for purpose.

~~7.89.~~7.70. Good quality HMOs make an important contribution to local housing provision, particularly for vulnerable groups and those on lower incomes. For some people the availability of bedsits may be the only alternative to homelessness. For these reasons the loss of good quality shared living accommodation will be resisted, including where loss occurs through the self-containment of parts or all of buildings. We will seek to protect HMOs where there is good reason to believe they could be improved to a decent standard.

~~7.90.~~7.71. Consideration will be given to changes of use of existing HMOs where it is suitably demonstrated that the building does not meet local and other relevant standards, as set out in the Housing Act 2004 and the Management of HMOs (England) (Regulations) 2006), and has no realistic prospect of meeting these. The Council's Environmental Health team will be consulted on a case-by-case basis to assist in determining the condition of the accommodation and whether it can be maintained at an acceptable standard. Where change of use or re-development is acceptable in principle, ~~we will seek~~development proposals must make appropriate re-provision of residential floorspace giving priority to HMO or other accommodation to meet priority needs in the Borough, including genuinely affordable housing.

~~7.91.~~7.72. New HMOs should contribute positively to their local area.~~ities by supporting the delivery of mixed and balanced communities~~. ~~Development p~~Proposalsand must ~~demonstrate that the development will~~ not result in a ~~proliferation or~~ harmful overconcentration of HMOs ~~in the local area~~. This is to ensure an appropriate distribution of different types of housing provision across the Borough, along with the protection of the character and amenity of immediate and neighbouring

properties. Furthermore, as with other forms of higher density development, housing with shared facilities should be sustainably located in well-connected areas with good ~~public transport accessibility levels (PTAL 3 or higher) and within easy~~ access to facilities and services.

~~7.92.~~7.73. The Council ~~o help inform preparation of the Local Plan~~has ~~undertaken~~ continued to monitor and review of HMO accommodation ~~i~~In Lewisham ~~was undertaken.~~[87] A 2018 review identified a substantial clustering of HMOs in the south of the Borough.[88] ~~It~~ ~~The review considered various data sources and concluded that while the Borough has not experienced a significant increase of HMOs in recent years, that there has been a notable change in the spatial distribution of HMOs. Specifically, the review identified a substantial increase and clustering of HMOs in Lewisham's southern wards, which have traditionally exhibited the lowest presence of this type of provision. As a result of these findings the Council~~ ~~has subsequently~~ The Council subsequently implemented an ~~non immediate~~ Article 4 Direction~~, coming into force in March 2020~~, ~~which will~~ to remove~~s~~ the Permitted Development rights for the conversion of single dwellings into small HMOs (3-6 bedrooms) within ~~the wards Bellingham, Whitefoot, Downham and Grove Park~~parts of the Borough's south. 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.[89] The Council is therefore considering extending the Article 4 Direction area. Development p~~P~~roposals for new small HMOs in ~~these wards~~areas covered by an Article 4 Direction will be considered against Part (B) of the policy.

Commented [NE276]: Removed to make more concise – the HMO Review report is referred, and this is publicly available as part of the local plan evidence base

Commented [NE277]: Amended to reflect Ward boundary changes

Commented [NE278]: Amended to reflect on findings of new 2022 HMO review

Large-scale purpose built shared living accommodation

~~7.93.~~7.74. ~~London has very recently experienced a rise in development of L~~large-scale purpose-built shared living accommodation, including co-living schemes~~. These products~~ are similar in built form~~at~~ and layout to student housing but tend to include ~~a bespoke range of~~ facilities, services and communal spaces tailored to a wider range of occupants, such as young professionals. The ~~draft~~ London Plan defines this type of provision as a shared living accommodation generally comprising of 50 units or more. ~~However, in~~ In Lewisham this threshold will be ~~considered~~ established on a case-by-case basis, with the London Plan and relevant Local Plan policies applying on developments of 20 or more units as a ~~general~~ guideline. This is owing to the significant variances in the character, urban structure and mix of uses across the Borough, and the need to ensure development of this nature and scale is appropriate to its location.

Commented [NE279]: Supporting text amended throughout to make more concise and to reflect changes to criterion D above.

~~7.94.~~ Whilst recognising that housing with shared facilities contributes to meeting housing need in London, ~~our~~ the Lewisham SHMA (2022) indicates that there is

~~87 Lewisham HMO Review and Evidence Paper Update (2018).~~
88 Lewisham HMO Review and Evidence Paper Update (2018)
89 Lewisham HMO Review and Evidence Base Paper (May 2022).

an acute need in the Borough for conventional housing, ~~priority is to secure provision of~~especially genuinely affordable self-contained housing, including for families~~, as set out in Policy HO 1 (Meeting Lewisham's housing needs)~~. ~~We will therefore resist proposals for large-scale purpose-built shared living in order to ensure new development optimises the use of land for conventional housing, particularly on larger sites that have capacity to accommodate major development.~~

~~7.95.~~7.75. ~~Consistent with draft London Plan Policy H18, we will only support~~Development proposals for large-scale purpose-built shared living ~~accommodation~~ will therefore only be supported where there is an identified local ~~need~~ market demand for such provision, and they will not lead to a proliferation of this type of housing locally. ~~Applications will be required to provide sufficient justification for accommodation of this type and demonstrate there is a clear local market need for it.~~ This is to ensure that development does not compromise opportunities ~~for more~~ to deliver conventional ~~forms of~~ self-contained, family housing and affordable housing units, ~~to be delivered on larger sites,~~ and to prevent against speculative development which does not adequately respond to local need. Applicants will be required to submit robust evidence of market demand in the Borough for the type of provision proposed, along with evidence to demonstrate that the development will not result in a proliferation of purpose-built shared living in the Borough.

Commented [NE280]: Supporting text amended to make clear how development proposals must justify the appropriateness for large scale shared living

~~7.96.~~7.76. It is imperative that large-scale shared accommodation is of a high quality design and ~~appropriately designed and~~ well-managed~~, so to meet the specific housing need~~ in order to address the requirements and number of residents it is intended for. This includes provision of high quality, adequately sized and functional living spaces, communal indoor and outdoor amenity areas, and shared facilities. ~~that comply with the Local Plan requirements, including Policies QD 2 (Inclusive and safe design) and QD 8 (Residential design and density), meet Environmental Health and Fire Safety standards, and make adequate provision of communal space and facilities. In addition, all~~ Development proposals must be accompanied by a management plan covering matters such as site management and maintenance, communal facilities, safety and security for occupants, and mitigation of potential noise or other nuisance.

Commented [NE281]: Repetition – housing design policies set out elsewhere in the plan

~~7.97.~~7.77. ~~Where proposals are acceptable in principle, we will require that~~ All large-scale shared living units must be available for rent with minimum tenancy lengths ~~are available to occupants~~ of at least 3 months, in line with the London Plan. This is necessary to ensure that the development ~~meets a specified need and~~ is retained as shared accommodation over its lifetime. We will seek to ensure that development is appropriately designed and managed in order to prevent against future material changes of use, where development effectively reverts to another form~~s~~ of specialist accommodation, such as a large scale hostel~~s~~, which ~~are~~ is not considered appropriate in the Borough, or conventional housing for which the building is not originally designed and intended for.

Commented [NE282]: Amended for conformity with London Plan

~~7.98.~~7.78. ~~Given their nature and scale,~~Development proposals for large-scale purpose-built living accommodation ~~will be expected to~~must make a cash-in-lieu contribution ~~contribute~~ towards ~~the delivery of~~ affordable housing in the C3 Use Class.~~, in line with the draft London Plan. However, because development is not in the C3 Use Class and does not meet minimum space standards for conventional housing, and generally consists of bedrooms rather than housing units, it is not considered as a suitable form of affordable housing in itself. Off-site planning contributions will be required, to be secured on a case-by-case basis having regard to viability, in accordance with the level of contributions sought by the London Plan.~~ In line with the London Plan, the contribution is to be equivalent to 35 per cent of the units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses, in accordance with Policy E7, to be provided at 50 per cent of the market rent. The nature of the payment, whether up-front cash-in-lieu or annual payments in perpetuity to the Council, will be established on a case-by-case basis.

Commented [NE283]: Amended for conformity with the London Plan

HO ~~10~~9 Self-build and custom-build housing

A. The Council will keep a register of those seeking to acquire serviced plots in the Borough for their own self-build and custom-build house building. It will also seek to identify ~~sites~~ plots to help meet identified need for~~, and facilitate development of,~~ self-build and custom-build housing particularly where this will improve access to affordable housing ~~for local residents~~.

Commented [NE284]: Amended to make clear that Council will fulfil this statutory obligation

B. Development proposals for self-build or custom-build housing will only be supported where ~~a local need for this type of provision is clearly established and~~ they:
   a. Make the optimal use of land and support the delivery of the spatial strategy,; ~~for residential development in contributing to the delivery of the Borough's strategic housing target, with a density level that is appropriate to the site having regard to Policy QD 8 (Residential design and density);~~
   b. Make provision for affordable housing in line with Policy HO-3 (Genuinely affordable housing); and
   c. Are appropriately located~~,~~ and of ~~designed to~~ a high quality ~~standard~~design, with reference to other Local Plan policies ~~(including sustainable design principles), integrate adequate amenity space and make a positive contribution to the neighbourhood in which they are situated, consistent with other Local Plan policies~~.

Commented [NE285]: Removed as this requirement is considered too onerous and to provide a more positive approach for this type of housing

Commented [NE286]: Repetition – policy on the optimal use of land is covered elsewhere in the plan

Commented [NE287]: Repetition – design standards sets out elsewhere in the plan

C. Development p~~P~~roposals for self-build ~~or~~ and custom-build housing ~~should~~ must demonstrate how the design-led approach has ~~informed the development~~been used.~~, and~~ They should clearly identify whether there are any elements of the design that may ~~be change or become~~require adaptation~~ed owing to the unique nature of the design and construction process~~ to secure the delivery of new housing.

Commented [NE288]: Amended for clarity and to aid policy implementation

Explanation

~~7.99.~~7.79. Self-build and custom-build housing is housing that is built or commissioned by individuals, or associations of individuals, for their own occupation. This type of development can provide a more affordable route to home ownership than other

options available, such as 'built for sale' market housing. Self-build generally refers to people who apply their own skills in the design and construction process, whereas custom-build involves the outsourcing of industry professionals, often for bespoke or innovate schemes. Self-build and custom-build housing units provide an additional source of supply of conventional housing and a further housing choice, and will therefore be considered as housing in the C3 Use Class for policy implementation.

7.80. The Council has a ~~statutory~~ duty under the Self Build and Custom Housebuilding Act 2015 and Custom Housebuilding (Register) Regulations 2016 to ~~maintain~~ keep a register of those seeking to acquire plots for self-build and custom-build housing in the Borough and to have regard to this register in its planning~~,~~ and housing ~~and related~~ functions. The register forms part of the Local Plan evidence base ~~informing Local Plan preparation~~. It provides an indication of the demand for serviced plots ~~for self-build and custom-build housing~~ from individuals or groups who meet specific eligibility ~~considerations~~criteria. The Lewisham SHMA (~~2019~~2022) has also considered demand for this type of provision. This research indicates that whilst there is some interest locally it comprises a small proportion of Lewisham's overall housing need. In addition, more than one-third of applicants on the local register have also expressed an interest in the Greater London Authority register, and it is therefore not clear whether demand is exclusively for Lewisham or elsewhere. ~~Given the Borough's heavily urbanised inner London context.~~

Commented [NE289]: Factual update – reference to relevant legislation

~~7.100.~~7.81. Identifying suitable sites for self-build and custom-build housing in Lewisham will remain a challenge with the ~~where there is a~~ limited (and often constrained) supply of land to meet the needs of a growing population~~,~~. ~~there will be few opportunities for people to acquire appropriately located sites to build their own homes.~~ This is particularly given that all applicants on the Council's local register have expressed a preference for plots located in 'town centres'.~~,~~ These are locations where the capacity of sites will need to be optimised through higher-density development, in line with the spatial strategy for the Borough, and may not be best suited for more moderately scaled self-build or custom-build projects. Local land values may also ~~prohibit the~~ present viability issues for those seeking to acquire plots.~~of such development.~~

~~7.101. Nonetheless, the Council is broadly supportive of self-build and custom-build housing. For example, we have recently collaborated with a local community organisation, making available land to enable a new self-build development of 33 residential units in the Ladywell area, at a site known as Church Grove. The development is supported by an innovative Community Land Trust structure that will ensure the new homes are affordable in relation to local incomes over the long-term. This development demonstrates our commitment to seek to meet demand within the Borough, and we will continue to monitor Lewisham's register in line with the relevant statutory requirements.~~

Commented [NE290]: Removed to make more concise – does not affect policy or its implementation

~~7.102.~~7.82. Development p~~P~~roposals for self-build and custom-build housing must use the design-led approach to ensure high quality development ~~will be supported~~

~~where they~~ that responds positively to the locality, optimises the capacity of sites and supports the delivery of the spatial strategy for the Borough. Applicants should clearly identify whether any elements of the design may require adaptation or alterations. This will help the Council to work with applicants to respond to the unique challenges facing self-builders and to ensure schemes are policy compliant. ~~All proposals must be designed to a high quality standard and make P~~provision for ~~an element of~~ affordable housing~~, where appropriate~~ will be required in line with other Local Plan policies. ~~Given Lewisham's challenging future requirement for conventional housing it is imperative that all development, including self-build and custom build housing, optimises the use of sites including through densities that are appropriate to the site location.~~

HO ~~11~~10 Gypsy and traveller accommodation

~~A. The Council will continue to assess the accommodation needs of Lewisham's gypsy and traveller community. Where there is a demonstrated local need for this type of provision, it will be addressed through a future review of the Local Plan.~~

~~B.~~A. There is an identified need in Lewisham up to 2031 for 6 additional permanent gypsy and traveller pitches. ~~To meet the Borough's current identified need for gypsy and traveller accommodation, a~~ To meet this need in full a ~~new site is~~ site allocation~~ed~~ policy is included in this Local Plan.

~~C.~~B. ~~All~~ Development proposals for gypsy and traveller accommodation, including ~~the development of new~~ sites and pitches, must ~~meet the following requirements~~be of a high quality layout and design and make adequate provision for:

a. ~~Suitable provision of B~~basic amenities including ~~for~~ running water, sewerage/drainage, energy and waste management;
b. Safe and reasonably convenient access to and from the site~~main road network~~;
c. ~~Acceptable~~ Access, parking and servicing arrangements for all vehicles likely to use the site, including emergency service~~s vehicles (giving consideration to access, parking, turning and service requirements)~~;
d. A site location that is well-integrated into the locality with r~~R~~easonable access to local shops, services and community facilities ~~having particular regard to~~including education, ~~and~~ health ~~services~~ and social care; and
e. ~~The provision is well integrated into the locality with a satisfactory layout and standard of F~~facilities to serve occupiers of the development, including where appropriate pitches, hardstanding, amenity blocks, ~~open~~ and amenity space and play areas.~~; and~~

~~D.~~C. Development proposals for gypsy and traveller accommodation must not ~~result in unacceptable~~ pose a risk to public health and safety, and not adversely impact~~s~~ on the ~~safety and~~ amenity of site occupants and neighbouring properties.

Explanation

~~7.103.~~7.83. The National Planning Policy for Traveller Sites (2015), which sits alongside the NPPF, sets out the Government's aim to ensure fair and equal

Commented [NE291]: Arrangements for local plan monitoring are set out in Part 4 of the plan. A gypsy and traveller assessment has been undertaken to inform this local plan, as set out in the policy and supporting text.

Commented [NE292]: Respond to consultation and to ensure conformity with the London Plan – the Local Plan must include a 10-year pitch target for this type of provision, as informed by local evidence.

Commented [NE293]: Criteria amended for clarity and to aid policy implementation – the policy principles remain.

treatment for travellers, in a way that facilitates their traditional and nomadic way of life of while respecting the interests of the settled community. The London Plan requires the Local Plan to include a 10-year pitch target for permanent gypsy and traveller pitches, based on a needs assessment.[90]

~~7.104.~~7.84. Travellers are part of the diverse community in Lewisham. ~~In line with the National Planning Policy for Traveller Sites, T~~the Council has undertaken an assessment to understand the housing needs ~~requirements~~ of Lewisham's gypsy and traveller population. The Lewisham Gypsy and Traveller Accommodation Assessment (2015 and amended 2016) identifies a ~~minimum~~ need for 6 pitches ~~within the plan period~~up to 2031.~~,~~ This need arises~~ing~~ from people currently living in bricks and mortar homes, teenage children and household formation. To meet this need a site allocation policy is included in Part 3 of the Local Plan (Lewisham's South Area, Land at Pool Court). A Masterplan and Capacity Study (2018) demonstrates that this type of housing provision can feasibly be delivered at the site.

~~7.105. 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 Report was published for a Regulation 18 stage consultation. This ran for a six-week period from 10th September 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. The Council will now proceed with making provision for a dedicated gypsy and traveller site by way of a site allocation in this Local Plan (i.e. Poole Court). The single Issue Gypsy and Traveller Site Local Plan has therefore been withdrawn from the Council's Local Development Scheme.~~

Commented [NE294]: Not required for Regulation 19 plan

~~7.106.~~7.85. ~~The Council is committed to ensuring suitable provision is made to meet identified need for gypsy and traveller accommodation.~~ The London Plan states that a London-wide gypsy and traveller needs assessment will be undertaken in the future. The Council will monitor any changes to the London Plan to inform a future review of the Local Plan. In the interim, d~~D~~evelopment proposals for new gypsy and traveller sites, pitches and/or plots will be assessed against this policy. ~~the windfall development policy criteria set out in HO 11.B above. The policy will also apply to any future proposals to address any identified additional need arising over the plan period that cannot be accommodated within adopted site allocations, and in advance of a Local Plan review~~.

Commented [NE295]: Amended to reflect latest London Plan position on gypsy and traveller accommodation

[90] London Plan (2021) Policy H14 (Gypsy and traveller accommodation) sets out that Boroughs that have not undertaken a needs assessment since 2008 should use the targets included in Table 4.4 of the London Plan.

8 Economy and culture

What you've told us

Concerns about:

- Shops and traders getting priced out the area
- The quality and future of our High Streets
- Number of hot-food takeaways, especially near schools
- Lack of opportunities for young people, such as apprenticeships

More should be done to provide good jobs for local people by:

- Supporting small businesses, including start-ups and independents
- Making space for trades, such as mechanics and builders
- Encouraging a wider mix of uses in town centres, not just shops
- Promoting the night-time economy
- Protecting our thriving markets, cultural venues and pubs
- Securing reliable, high speed broadband for businesses to thrive

What we've learned

Small local economy, formed mainly of small businesses

- Just 40 jobs for every 100 working age residents, the second lowest proportion of any London borough.
- 90% of businesses in Lewisham are small businesses

More business space needed, including affordable workspace

- Lewisham is losing industrial land at a faster rate than the rest of London
- Excellent take-up of workspace – but limited space available for businesses to expand or locate here
- Rents are similar to the London average, but rising
- About 1,000 square metres of new workspace will be needed each year to 2040, mainly for light industrial and office uses.

Creative sector growing quickly

- Creative and digital sector is outpacing growth across London
- Lewisham has some of the highest numbers of artists' workspaces in the Capital along with world renowned institutions, such as Goldsmiths College and Trinity Laban Centre.

High streets face challenges

- Online shopping continues to rise
- Some town centres are faring better than others - nearly 40% of units in Leegate are vacant, the most of all larger centres
- About 5,300 square meters of new retail floorspace will be needed by 2030.

COVID-19 has impacted businesses

- Businesses and jobs have been impacted by COVID-19. The Local Plan will help to support the recovery of Lewisham's economy.

Main issues

Making the best use of land

Space is needed for businesses to grow and prosper. But many more homes must be built. The right balance must be struck to achieve the best use of land.

Out-of-centre retail parks

The future role of out-of centre retail parks in a growing borough needs to be considered.

Inclusive economy

Cultural and creative industries are quickly expanding, with opportunities to grow the local economy around them. Yet other sectors can provide good jobs for local people and should be supported.

Affordable workspace

With low vacancy rates in most employment areas and rents rising, affordability of workspace is an issue.

Design quality

Poor design quality has played a part in low uptake of units in some mixed-use buildings, despite demand for space.

High Streets need help

Measures are needed to respond to the challenges facing the high street and to ensure town centres remain vibrant places.

We're proposing to…

Protect and revitalise industrial areas

- Introduce stronger protections for employment sites, so they remain in business use
- Regenerate underused x sites, such as Convoys Wharf and Surrey Canal Triangle
- Enable the mixed-use redevelopment of some sites for new workspace and housing - but only where there is no loss of business space
- Grow the cultural and creative industries by identifying a new Creative Enterprise Zone in north Lewisham

Secure high quality and affordable workspace

- Require that new workspace is designed and built to a high quality standard
- Seek affordable workspace in larger developments

Make town centres more vibrant places

- Identify new evening and x night-time economy hubs and Cultural Quarters
- Protect markets, cultural venues and pubs

- ~~Encourage a richer mix of uses, whilst identifying 'shopping areas' in larger centres to retain traders~~
- ~~Review the network of shopping parades and re-designate some as local centres~~
- ~~Transform out-of-centre retail parks into areas for housing, jobs x and community uses~~

~~We've also considered~~

- ~~Not allowing for mixed-use development (including housing) on industrial sites.~~
- ~~Specifying the mix of different types of uses allowed on the high street.(such as shops)~~
- ~~If contributions for affordable workspace harm the viability of the development~~

~~<Did you know?>~~

~~Lewisham has been named the Borough of Culture for 2022, which will feature an exciting programme of events. The borough also has one of London's first Creative Enterprise Zones (CEZ), reflecting the strength of its creative and cultural industries.~~

Commented [NE296]: Not required for Regulation 19 plan

Note: Paragraph numbers for the supporting text in Part One, Section 8 do not appear in the desktop published version of the Draft Local Plan (January 2021) due to a publishing error. They have been added below for completeness.

EC 1 A thriving and inclusive local economy

A. ~~Everyone should have access to high quality education, training and job opportunities.~~ The Council will ~~help~~ work positively with stakeholders and its delivery partners to build a thriving and inclusive local economy ~~by~~ that provides everyone with access to high quality education, training and good job opportunities. ~~attracting and generating inward investment, including by:~~This will be achieved by:

   a. Promoting and strengthening Lewisham's role in the London economy~~,~~ including by supporting business sectors of local importance, ~~,~~such as the cultural, creative and digital industries, along with expanding the role of green industries to enable the transition to a low carbon, circular economy;
   b. ~~Working with stakeholders to~~Ensuring the timely delivery of ~~strategic~~ infrastructure to support business growth and development ~~(including transport, digital and communications infrastructure) that~~ and to better enable~~s~~ local residents and businesses to access economic opportunities across the Borough and further afield;
   c. Safeguarding industrial land and making provision for vibrant and attractive employment locations, including town centres, that ~~accommodate a wide range of uses and workspaces which~~ are well-connected and suited to the needs of modern business;
   d. ~~Ensuring~~ Requiring that new employment development is ~~designed to~~of a high quality ~~standard~~ design and contributes positively to the local area;
   e. Retaining and s~~S~~ecuring new low~~er~~-cost and affordable workspace~~,~~ and ~~coordinating with specialist providers to~~ ensuring~~e this~~ it is appropriately managed; and
   f. ~~Providing~~ Ensuring residents ~~with~~ benefit from good access to high quality jobs as well as education, skills and employment training opportunities.

Commented [NE297]: Respond to consultation – request that local plan provide greater support green industries

~~Cultural and creative industries~~

~~B.~~A. ~~The cultural and creative industries (including education and training facilities that support and are associated with these industries) contribute to the diversity and distinctiveness of Lewisham's neighbourhoods and play an important role in the local economy. Development proposals should help facilitate the continued growth and development of these industries by:~~

- ~~a. Protecting existing cultural venues and uses, including by having regard to policy QD7 (Amenity and agent of change);~~
- ~~b.~~a. ~~Making provision for new cultural venues, workspace and performance space in town centres and other appropriate locations, particularly in major development proposals and large-scale regeneration schemes;~~
- ~~c.~~a. ~~Designing public realm with spaces that can be adapted to support civic and cultural events, including outdoors, in line with Policy QD3 (Public realm and connecting places);~~
- ~~d.~~a. ~~Considering the use of vacant properties and land for temporary pop-up or meanwhile uses for cultural and creative activities, having regard to Policy EC 22 (Meanwhile uses); and~~
- ~~e.~~a. ~~Facilitating the provision of high quality, fast and reliable digital infrastructure, in line with Policy TR7 (Digital and communications infrastructure and connectivity).~~

~~C.~~A. ~~The Lewisham North Creative Enterprise Zone (CEZ) is designated in the Local Plan. Development proposals will be expected to support and, where appropriate, contribute to enhancing the cultural and creative industries within the CEZ, in line with Policy LNA3 (Lewisham North Creative Enterprise Zone).~~

Commented [NE298]: This has been moved and incorporated into amended policy EC18 Culture, creative industry and night-time economy

Explanation

8.1. London is a global centre of trade and commerce and the engine of the UK economy. Prior to Covid-19 London underwent a strong and sustained period of economic growth. However the same levels of growth were not experienced in Lewisham. Whilst the number of new businesses being formed in the Borough has risen over recent years much of this is due to structural changes in the nature of work with higher levels of self-employment and contract work along with expansion of the gig economy. There are just 40 jobs in Lewisham for every 100 working age residents, the second lowest proportion of any London borough. In addition, local employment is underrepresented in higher skill sectors, such as professional services. Wage levels for workers in Lewisham are lower than the regional average.[91] In short, London generates a significant amount of wealth but the benefits of its economic success are not evenly or equitably shared within it.

8.2. Covid-19 has had a pronounced short-term impact on the UK economy. The magnitude of the recession caused by the pandemic is unprecedented and the 9.8

[91] Lewisham Local Economic Assessment (2018).

per cent decline in 2020 of the country's Gross Domestic Product (GDP), a key measure of economic output, is the steepest since records began.[92] London has suffered severely during the pandemic and it faces a challenging economic outlook over the short-to-medium term.[93] Covid-19 has also affected the nature of business activity, for example, by accelerating trends in home-working and the use of multi-channel or online shopping. There remain uncertainties on the long-term implications of the pandemic however it is clear that targeted measures are needed to support Lewisham's economic recovery.

Commented [NE299]: Respond to consultation – to reflect on impact of Covid and Brexit and implications for Local Plan

~~8.1.~~8.3. Helping to facilitate the creation of a thriving~~, diverse and inclusive~~ local economy ~~is one of our~~that tackles inequalities is one of the Local Plan's key ~~priorities~~strategic objectives. ~~This means~~To realise this objective it will be necessary to grow~~ing, and~~ strengthen~~ing~~ and diversify the local ~~economic~~ employment base~~.~~. Lewisham has lost a significant amount of its industrial capacity over recent years, and at a faster rate than the rest of London, diminishing its relatively limited supply of employment land.[94]~~making available a wide range of job opportunities, workspaces and employment sites across the Borough.~~ To meet the Borough's future needs for business activity and jobs it will be necessary to safeguard employment land and create new modern workspace. By delivering this provision it will be easier to attract different types of industries and employers to the Borough, whilst also ensuring local businesses have space to start-up, grow and prosper. This is particularly important for ~~businesses in those~~ sectors where Lewisham can perform a niche role ~~in the wider London economy~~. These include~~s~~ the cultural, creative and digital industries, for example, whose presence in ~~the~~ Deptford and New Cross ~~areas~~ has enabled the ~~Borough~~ area to be designated ~~by the London Mayor as~~ one of London's first Creative Enterprise Zones (CEZ)~~, known as SHAPESLewisham. The Local Plan helps to embed that designation in planning policy and establishes the extent of the CEZ area~~. The green industries also present opportunities to respond to the climate emergency by supporting London's transition to a low carbon, circular economy.

~~8.2.~~8.4. ~~Equally, we are committed to~~In order to ~~tackling~~ tackle inequalities and the economic barriers that affect people's lives it is imperative that everyone ~~by ensuring residents have~~has opportunities to access ~~to~~ good quality job~~s opportunities~~ along with high quality education, skills and training. It is recognised that many people take up work or training outside of the Borough, taking advantage Lewisham's good transport links to the rest of London and beyond. However, securing a wide range of local provision is vital to creating a more inclusive economy and giving residents greater choice in accessing opportunities closer to where they live. This policy sets out our overall approach to facilitate development and channel investment in a way that allows everyone to share in Lewisham's economic prosperity.

[92] Coronavirus: Economic Impact (2021). Daniel Harari and Matthew Keep. Accessed from House of Commons Library.
[93] Covid-19 and London's Economy – Impacts so far and economic outlook (2021). GLA Economics.
[94] Lewisham Employment Land Study, 2018 and Authority Monitoring Reports.

~~8.3. Economic development should not be considered in isolation of sustainable neighbourhood development. Where proposals involve the creation of new workspace, this should be designed to a high quality standard, having regard to the character and function of the immediate and surrounding area. All new development must be compatible with its neighbouring uses. It should also deliver high quality public realm that improves the liveability of neighbourhoods, whilst also reinforcing and enhancing people's sense of place.~~

Commented [NE300]: Repetition – design of workspace is covered elsewhere in the plan

Table 8.1: Employment Land Hierarchy

EC 2 Protecting employment ~~sites~~ land and delivering new workspace

A. ~~Employment sites and floorspace~~ Land within Lewisham's employment land hierarchy, ~~(~~as set out in Table 8.1 ~~below,)~~ ~~will be~~is safeguarded for ~~commercial~~ Class E(g) office and light industrial, ~~and~~ Class B2 industrial, Class B8 storage and distribution and related Sui Generis uses. ~~Proposals for new d~~Development proposals ~~should be~~ must ensure that land-uses are commensurate with the type and function of land ~~and sites~~ within this hierarchy.

Commented [NE301]: Amended for clarity and to aid policy implementation – specifying appropriate industrial uses, with reference to new Use Classes Order

B. There is a forecast need for 21,800 square metres of net additional employment floorspace ~~(Use Class B1)~~ in the Borough up to 2038. Development proposals must contribute to meeting t~~T~~his need ~~will be met~~ by:
   a. Within Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), retaining and wherever possible delivering net gains in industrial capacity, including by intensifying the use of land ~~(ensuring no net loss of floorspace and operational yard space) along with intensifying employment development, including by facilitating the co-location of employment and other compatible uses through the plan-led process~~;
   b. Facilitating the delivery of new modern workspace through the comprehensive regeneration of Mixed-use Employment Locations (MEL);
   c. Maximising opportunities ~~for~~ to deliver new and enhanced ~~employment provision~~workspace, including through appropriate mixed-use development in town and edge-of-centre locations and non-designated employment sites;
   d. Outside of SIL, ~~resisting~~ avoiding ~~the redevelopment of employment land and sites where proposals~~ development that consists solely or predominantly of Class B8 storage ~~and~~ or warehousing uses unless:
      i. The site is currently solely or predominantly in storage and warehousing use; and
      ~~i.~~ii. Redevelopment proposals comprise of intensification of storage and warehousing uses and/or employment generating uses appropriate to the site; and
   e. ~~Refusing~~ Ensuring development ~~proposals that would~~ does not result in a net loss of viable ~~employment land and floorspace~~industrial capacity, whether this is existing or consented but not built, having regard to other Local Plan policies.

Commented [NE302]: Respond to consultation and for conformity with London Plan – plan should refer to industrial capacity not floorspace, yard space, etc.

Commented [NE303]: Respond to consultation – to provide more flexibility and ensure that policy does not preclude development, improvement and/or intensification of sites already in storage and distribution uses

C. Outside of designated employment areas the appropriateness of development proposals for new Class E(g) office and light industrial, Class B2 industrial, Class B8

storage and distribution and similar Sui Generis Uses will be assessed having regard to the nature and scale of the development and:

a. Its contribution to the delivery of the spatial strategy for the Borough;
b. Compatibility of the proposed use(s) with the adjoining and neighbouring land uses, including consideration of impacts on local amenity;
c. Whether the employment provision is for temporary use; and
d. Compliance with other Local Plan policies.

D. Planning conditions will be used to protect new commercial and industrial development from changes of use.

E. Where new business floorspace is conditioned for a specific use, changes to another commercial or industrial use appropriate for the site and employment area will only be permitted where there is no reasonable prospect of the unit(s) being retained for the conditioned use. This must be evidenced by a robust and recent marketing exercise covering a minimum continuous period of twelve-months at a reasonable rental or sale value for the local area. All such changes of use must comply with other Local Plan policies.

~~C.~~A. ~~Development proposals on sites within Strategic Industrial Locations must not adversely impact on the functional integrity of the SIL or prejudice the continued operation of commercial and industrial uses on the site or within the employment area.~~

~~D.~~A. ~~Proposals for the co-location of employment and other compatible uses will only be supported at selected SIL sites, and where it can be suitably demonstrated that the requirements of draft London Plan policies E5 (Strategic Industrial Locations) and E7 (Industrial intensification, co-location and substitution), and other relevant Local Plan policies, are satisfied. Further detailed requirements are set out in the corresponding site allocation policies for the following sites:~~

~~a. Apollo Business Centre (Surrey Canal Road SIL)~~
~~b.~~a. ~~Trundleys Road (Surrey Canal Road SIL)~~
~~c.~~a. ~~Evelyn Court (Surrey Canal Road SIL)~~

Table 8.1 Lewisham's Employment Land Hierarchy

Type	Ref	Location	Function
Strategic Industrial Location	SIL	Bromley Road Surrey Canal Road (including Bermondsey Dive Under~~—new~~)	London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of the regional economy. Protected for a wide range of commercial, industrial and related uses, in accordance with the London Plan.

Commented [NE304]: This policy has been moved from former EC3 Location and design of new workspace.

Commented [NE305]: Respond to consultation – Local Plan must address recent changes to planning legislation. This includes changes to Use Classes Order which extends scope of permitted development rights. These policies will help the Council to secure new workspace for specific uses.

Commented [NE306]: Respond to consultation – further clarification needed on approach to SIL. A new standalone policy on SIL has been created, as per new EC5, which this policy has been moved to.

Locally Significant Industrial Site	LSIS	Apollo Business Centre Blackheath Hill Childers Street West Clyde Vale Endwell Road Evelyn Court Evelyn Street Lower Creekside Malham Road ~~(with/~~ 118 Stansted Road~~)~~ Manor Lane Molesworth Street Perry Vale Stanton Square Trundleys Road Willow Way Worsley Bridge Road	Lewisham's main local concentrations of commercial and industrial uses, which perform a niche role to support the functioning of the sub-regional and local economy. They provide workspace for micro, small and medium sized businesses, including in the cultural, creative and digital industries. Protected for commercial and industrial uses, with priority given to ~~Class B1 commercial and~~ light industrial uses.
Mixed-use Employment Location	MEL	Arklow Road Childers Street East Convoys Wharf Grinstead Road Oxestalls Road Plough Way Sun and Kent Wharf Surrey Canal Triangle	Larger redundant and/or underused industrial sites where plan-led, mixed-use redevelopment is permitted to support ~~strategic~~ regeneration~~ objectives in Lewisham.~~ and enable the delivery of n~~N~~ew, modern workspace~~ delivered through redevelopment is protected~~.
Non-designated employment site	N/A	Dispersed throughout Borough	Smaller commercial and industrial sites scattered across Lewisham, mainly serving local economic catchments, which collectively form an important component of the Borough's industrial land capacity.

Commented [NE307]: Amended to ensure protection of industrial land – sites released from SIL to be re-designated as LSIS

Explanation

~~8.4.~~8.5. This policy establishes Lewisham's employment land hierarchy~~,~~ which comprises the different types of employment land and sites in the Borough. The safeguarding of ~~sites~~ land within this hierarchy is necessary to ensure a sufficient supply of land and industrial capacity to meet the Borough's current and future needs for employment. ~~This includes floorspace, yard space for operations and servicing space.~~ ~~The hierarchy is reflected by the land-use designations on the Policies Map.~~ ~~These update the former Core Strategy (2011) designations, taking~~

Commented [NE308]: Respond to consultation and for conformity with London Plan – plan should refer to industrial capacity not floorspace, yard space, etc.

~~into account the latest technical evidence, including Lewisham's Employment Land Study (2019).~~[95]

Commented [NE309]: Not required for Regulation 19 plan

~~8.5.~~8.6. Designated employment locations include ~~regionally Strategic Industrial Locations (~~SIL~~s)~~, as set by the London Plan, and several types of locally strategic sites ~~.~~ which are ~~local sites include Locally Significant Industrial Sites (~~LSIS~~)~~, ~~formerly referred to as Local Employment Land, and Mixed-use Employment Locations (~~MEL~~s)~~. The successful delivery of the spatial strategy for the Borough is dependent on new employment development being directed to these locations, along with town centres~~.~~ ~~,~~ Development proposals should maximise opportunities to intensify and make a more efficient use of land, whilst ensuring ~~with~~ the type and nature of uses ~~being~~ is commensurate with the site's place in the employment land and town centre hierarchies~~y~~, where relevant. ~~Further detailed policies for the different types of employment land are set out later in this section.~~

~~8.6.~~8.7. Lewisham has a small amount of employment land when compared to other London b~~B~~oroughs~~, including in the sub-regional context~~. ~~Notably, the Council's Authority Monitoring Reports indicate~~ This limited supply has been diminished through significant and incremental losses of ~~employment land and floorspace in~~industrial capacity over recent years.[96] Some of this loss can be attributed to plan-led consolidation and release of land to support ~~strategic~~ regeneration ~~objectives~~, particularly through mixed-use redevelopment of MELs ~~sites~~ in the north of the Borough. However, beyond this plan-led process the Borough's other employment sites and premises are facing increased pressure for redevelopment from other higher value land uses, particularly housing. This pressure has been amplified by ~~the introduction of~~changes to planning legislation, for example, new P~~p~~ermitted D~~d~~evelopment rights enabling the conversion of offices and warehouses to residential uses through the Prior Approval process.

~~8.7.~~8.8. ~~In the light of these cumulative losses of employment land and floorspace,~~ T~~t~~he ~~draft~~ London Plan ~~provides that~~directs the ~~Council~~ Local Plan ~~must seek~~ to retain Lewisham's existing industrial capacity. In order to meet the Borough's future employment needs it will be necessary to not only safeguard designated and non-designated employment sites but to intensify uses on them. The Local Plan therefore seeks to facilitate a restructuring of the employment land stock~~, with policy interventions aimed at~~ to increas~~e~~ employment densities, ~~and realising an uplift in employment floorspace~~create additional industrial capacity and diversify uses within employment areas. ~~and~~ This will also help to create more local jobs and training opportunities across the Borough.

~~8.8.~~8.9. The ~~draft~~ London Plan provides in-principle support for the co-location of employment and other compatible uses on sites that are released from SIL and within LSIS, but only where this is facilitated through the plan-led process. Informed by findings of the Lewisham Employment Land Study (2019), the Local Plan helps

~~95 Further information is set out in the accompanying Schedule of Changes to the Policies Map (2020). This shows the proposed changes to the employment land designations.~~

96 Lewisham Employment Land Study, 2019 and Authority Monitoring Reports.

give effect to London Plan policies E5 (Strategic Industrial Locations) and E7 (Industrial intensification, co-location and substitution). Further requirements are set out in Local Plan policies EC5 (Strategic Industrial Locations) and EC6 (Locally Significant Industrial Sites) along with corresponding site allocation policies. ~~To secure the long-term viability of employment floorspace and to help facilitate the renewal of SIL and LSIS, we will support proposals for the co-location of employment and other compatible uses on selected sites at the Surrey Canal Road SIL, as identified in Policy EC2.C above and within LSIS, as set out in Policy EC5 (Locally Significant Industrial Sites). The co-location of SIL land will be enabled through replacement provision made at the Bermondsey Dive Under site, which will be newly designated SIL. Site allocation policies have been prepared for these sites to ensure that co-location is coordinated and appropriately managed through the plan-led and site masterplan process.~~

~~8.9.~~8.10. Our expectation is that there will be no net loss of industrial capacity in the Borough~~,~~ and that net gains are delivered wherever possible. ~~Where the site is vacant or cleared, the baseline figure should be established using the last active authorised use (excluding meanwhile uses).~~ Industrial capacity ~~is defined~~ in Lewisham will be calculated on the basis of the ~~as~~ existing commercial~~/~~ and industrial ~~floorspace~~ capacity on a site which is currently in active employment use, and covers Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and related Sui Generis uses ~~or the benchmark potential commercial/industrial floorspace that could be accommodated on site at a 65 per cent plot ratio (whichever is greater).~~ Where a proposed development site is vacant or cleared, the existing capacity should be established on the basis of the last active authorised commercial and industrial use(s) (excluding meanwhile uses). The existing capacity figure should also take into account any unimplemented authorised changes of use permitted through the Prior Approval process (which would effectively be discounted from the existing capacity). ~~Whilst the principle of no net loss of industrial capacity applies to overall areas of SIL and LSIS, and not necessarily to the individual sites within them, we will seek to ensure that individual proposals maximise the amount of employment floorspace. Furthermore, W~~whilst the integration of mezzanines are broadly supported by the Local Plan as a way to make a more optimal use of land, mezzanine space will be excluded from calculations of industrial capacity for the purpose of this policy.

~~8.10.~~8.11. ~~There may be limited circumstances where a plot ratio below the benchmark may be acceptable in principle.~~ Development proposals should retain industrial capacity and seek net gains through site intensification, including additional floorspace, wherever possible and appropriate. However it is recognised that net gains may not always be feasible. For instance, some types of industrial uses require a significant amount of operational yard or servicing space to function effectively. The onus will be on the applicant to demonstrate that the ~~65 per cent plot ratio benchmark cannot be feasibly delivered~~design-led approach has been used to make the optimal use of land and maximise employment provision~~taking into account individual site circumstances and the nature of the proposed use~~. This should include evidence of alternative design options, such as site layouts

Commented [NE310]: Moved to new standalone policy on SIL – see EC5

Commented [NE311]: This is retained in the paragraph - see below.

Commented [NE312]: Respond to consultation – plot ratio benchmark deleted for conformity with London Plan

Commented [NE313]: Included for clarity and to aid implementation of the policy.

and building typologies (including multi-storey or basement development)~~, considered through the design-led approach~~.

Commented [NE314]: Respond to consultation – plot ratio benchmark deleted for conformity with London Plan. Supporting text revised accordingly.

~~8.11.~~8.12. Lewisham's Employment Land Study (2019) has informed the strategic employment floorspace requirement that the Local Plan will address over the plan period. It suggests that there is additional need for some 21,800 square metres of office floorspace up to 2038. This type of floorspace is normally associated with ~~the B1a/b~~ Use Classes E(g)(i) and E(g)(ii).[97] However, the study emphasises that office development is not a homogenous product, pointing to the wide range of workspace typologies now available (such as serviced offices, incubators, accelerators and co-working space). Further, continuing shifts in modern commercial practices mean sectors that might traditionally have been thought of as office sectors can be found occupying 'hybrid' space in re-purposed industrial premises. In short, there is increasing fluidity in the workspace market and some office uses do not fit neatly into the Use Class Order categories. Therefore, the Council will take a broader view to planning for its future employment floorspace needs. We will promote the full complement of Class ~~B1~~ E(g) uses, including ~~B1c~~ E(g)(iii) light industrial uses, to ensure that the Local Plan does not unnecessarily constrain employment development. Development proposals for Class B2 industrial and B8 storage or distribution uses should be located within SIL and elsewhere where specified by the Local Plan. ~~Delivery of employment floorspace~~Industrial capacity will be closely monitored over the plan period to ensure our policy objectives are being realised.

8.13. Recent changes to planning legislation have extended the scope of Permitted Development rights.[98] This means that some commercial uses, such as Class E business uses, can be changed to Class C3 housing without the need for planning permission, subject to a Prior Approval process. Likewise, there is greater flexibility for changes between Class E business uses, for example from office and light industrial to retail, food and beverage, and professional services. 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

[97] Following the publication of the Lewisham Employment Land Study (ELS) 2019, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 have come into force. These effectively bring Use Classes B1(a), B1(b) and B1(c) into a new Use Class E (Commercial, Business and Service). The former Class B1 uses are now Class E(g)(i), E(g)(ii) and E(g)(iii) respectively. Where the ELS refers Class B1 Uses, the Local Plan reflects the corresponding Class E categories for consistency with planning legislation.

[98] This includes changes to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and amendments to the Town and Country Planning (General Permitted Development) (England) Order 2015.

Article 4 Directions to help protect the economic function and amenity of employment areas.[99]

EC 3 ~~Location and design of new~~ High quality employment areas and workspace

~~A. Proposals for new employment development should be directed to sites in Lewisham's employment land hierarchy, as set out in Policy EC2 (Protecting employment sites and delivering new workspace). If suitable sites are not available within these areas, then proposals should be directed to appropriate town or edge-of-centre locations, and other highly accessible locations.~~

Commented [NE315]: Repetition – location requirements set out in spatial strategy along with Policy EC2

~~B. Outside of designated employment areas and town centres, the appropriateness of a proposal for new employment development will be assessed having regard to:~~

- ~~a. Its contribution to the delivery of the spatial strategy for the Borough;~~
- ~~b. Good levels of accessibility including by walking, cycling and public transport;~~
- ~~c. Compatibility of the proposed use with the adjoining and neighbouring land uses; and~~
- ~~d. Whether the employment provision is for temporary use.~~

Commented [NE316]: This policy has been moved to EC2 Protecting employment land and delivering new workspace

~~C.~~A. ~~All new employment d~~Development proposals for Class E business, B2 industrial and B8 storage or distribution uses and related Sui Generis uses must ~~provide~~ be of a high quality design~~,~~ with well-integrated and purpose built ~~floorspace designed for commercial and/or industrial uses~~business space. ~~Proposals will be expected to~~They must ~~make a demonstrable~~demonstrate how the design-led approach has been used to improve~~ment in~~ the site's suitability for ~~accommodating employment generating uses~~business activity ~~with particular consideration given~~having regard to the type and use of space. Development proposals must:

Commented [NE317]: Amended to reflect appropriate uses in light of recent changes to the Use Classes Order

a. Optimise the use of land and maximise opportunities to ~~Type of floorspace provided and the expected~~increase job densities~~y arising from this typology~~;

b. Make p~~P~~rovision ~~of~~ for an appropriate ~~full~~ level of internal fit out beyond shell and core, including:

- i. C~~c~~onnection-ready high speed broadband;
- ii. Installation of mechanical and electrical services;
- iii. Toilets and kitchenette;
- iv. Internal surface finishing and blinds;
- v. Basic fire and carbon monoxide detection;
- ~~i.~~vi. Shopfronts and glazing, where appropriate.

Commented [NE318]: To make clear the minimum requirements for workspace fit out

~~b.~~c. Make p~~P~~rovision ~~of~~ for flexible workspace that can be adapted to the needs of different ~~end~~ employment user~~s~~, ~~including for micro, small and medium-sized businesses~~, particularly where there is not a specified end user;

[99] This is a direction under Article 4 of the General Permitted Development Order (GDPO) which enables the Secretary of State or the local planning authority to withdraw specified permitted development rights across a defined area.

~~c.~~d. Ensure the ~~Site~~ layout and design of development~~, with appropriate access and~~ provides adequate operational space ~~for the operational and~~including for site access and servicing ~~requirements of businesses~~;

~~d.~~e. ~~Environmental i~~improve~~ments,~~ the attractiveness and environmental quality of the site and employment area, including high quality public realm, where appropriate; and

~~e.~~f. ~~The development's~~Ensure a coherent and positive relationship ~~and compatibility~~ with adjoining and neighbouring land uses~~,~~ and protect~~ion of~~ local amenity, with reference to other Local Plan policies.

B. Development proposals for new Class E(g), B2, B8 and similar Sui Generis uses over 2,500 square metres (gross external area) must include a reasonable proportion of flexible workspace or smaller units suitable for micro, small and medium sized enterprises.

~~D.~~C. ~~Outside of~~Within the Forest Hill Cultural Quarter, Endwell Road LSIS and Ashby Mews non-designated employment site, development proposals for new self-contained live-work units will only be ~~refused~~ permitted where it is demonstrated that they will not adversely impact on the character, function and effectiveness of the Cultural Quarter and LSIS to accommodate commercial and industrial uses, and will not result in a net loss of industrial capacity. Development proposals for new live-work units outside of these locations will be refused.

Explanation

~~8.12. This policy helps give effect to the spatial strategy for the Borough, which seeks that employment development is directed to the designated employment areas and town centres across Lewisham, including within the Creative Enterprise Zone. By focussing activities in these locations we aim to ensure that residents have good access to a wide range of job opportunities and that businesses benefit from their proximity to complementary clusters of uses. Also, by concentrating employment development in these locations it will be easier to manage and protect the amenity of neighbourhoods, particularly from impacts associated with commercial and industrial uses.~~

~~8.13. Applicants are encouraged to engage with the Council early in the site selection process for assistance with potential site development opportunities. Where new employment development is proposed outside of designated employment areas and town centres, proposals will be expected to demonstrate that no suitable sites are available in these locations to accommodate the intended use. Flexibility may be afforded to temporary or meanwhile uses, or proposals for the replacement and/or refurbishment of existing employment provision, depending on the nature of land use and individual site circumstances. Proposals will be resisted where they are at odds with the spatial strategy for the Borough.~~

8.14. The redevelopment of industrial land and other employment sites is necessary to meet local needs for modern business space as well as to support site renewal and regeneration. Most of Lewisham's employment areas are located within or in

Commented [NE319]: Policy amended throughout for clarity and to aid policy implementation – policy principles retained

Commented [NE320]: Included to help give effect to London Plan policy on provision for flexible workspace from larger commercial developments

Commented [NE321]: Respond to consultation – recognition that there are authorised live-work units at Endwell Road LSIS (Dragonfly Place, Brockley), and the site is therefore suitable for such uses.

Commented [NE322]: Policy supporting text amended throughout to make more concise, and reflect changes in above policies

close proximity to residential areas. New commercial development that is well-designed can not only improve the quality and viability of employment areas and premises but also the liveability of neighbourhoods. Commercial development proposals must therefore respond positively to the wider neighbourhood context by addressing matters such as local character, amenity, public realm and green infrastructure.

~~8.14.~~8.15. ~~We are committed to delivering a significant increase in local jobs and providing residents with good access to employment and training opportunities. Development proposals will therefore be assessed against their contribution to raising employment densities and, where appropriate, making provision for more jobs and related opportunities (such as apprenticeships) than are currently available on site. Through the~~Development proposals must demonstrate how the design-led approach ~~applicants should consider how to~~has been used to optimise and make more efficient use of land and commercial floorspace. This may include consideration of layout options to provide higher plot ratios and building ~~solutions~~ designs to enable integration of smaller business units, co-working and incubator space, vertical stacking / multi-storey development, mezzanines and basement levels.

~~8.15.~~8.16. ~~All employment development should consist of well-designed, high quality and purpose built accommodation that responds positively to the local context.~~ Flexibly specified buildings and workspaces should be provided wherever possible, particularly where there is not a specified end user for the development. These are ~~considered~~ essential to ensuring the long-term viability of employment land and premises. This is because they allow for the reconfiguration of internal space to suit ~~new occupiers with different space requirements,~~ a wide range of end users and support business retention by enabling existing occupiers to expand in situ. Flexible specifications could also include, for example, full height delivery doors, capacity to site additional delivery doors to enable subdivision of buildings, and reallocation of space.

~~8.16.~~8.17. ~~New d~~Development proposals ~~will also be expected to~~must make appropriate provision for full internal fit out of buildings and workspace. This should normally include plumbing/heating, installation of sanitary and kitchen facilities, finishes for floors, walls and ceilings, and where appropriate, shopfronts and glazing. ~~All internal fit outs~~New development must also provide for modern communications facilities, including power points and connection-ready high speed broadband~~, having regard to Policy TR7 (Digital and communications infrastructure and connectivity).~~. Proposals should provide sufficient details of interior fit out~~s~~ at the application stage.

~~8.17.~~8.18. Proposals limited to 'core' and 'shell' only specifications are not considered appropriate and will be strongly resisted. This requirement is necessary to ensure the attractiveness and marketability of units, particularly in promoting early take up of workspace and helping to prevent~~ing against~~ long-term vacancies. It is also vital to supporting mirco, small and independent businesses which are unlikely to be in a position to absorb the initial overhead costs for fit out. ~~Careful~~

~~consideration should be given to the needs of the expected or potential end users at the early stage in the design process, particularly where agreements are in place.~~ The appropriate level of fit out will be considered ~~having regard to individual site circumstances~~on a site-by-site basis.

~~8.18.~~8.19. Site layout is especially important for commercial and industrial operators. The effective functioning of employment sites is dependent not only on fit for purpose buildings but also their associated operational land. Development p~~P~~roposals must therefore ~~include consideration of~~address matters such as vehicle access for loading and delivery, yard space, external storage, parking, site servicing and customer interface. A well-~~conceived~~ designed layout is also essential to ensuring the protection ~~and enhancement~~ of local amenity., ~~both for business operators within the employment area as well as the neighbourhoods in the immediate and surrounding locality. Developments must contribute positively to the neighbourhoods in which they are located, in line with other policies in the Local Plan. This includes provision of a high quality public realm to enhance the attractiveness of the employment area and positively contribute to local character. Planning statements should clearly address how the site and public realm will function and interface with adjoining uses, particularly on proposals involving mixed-use development or the co-location of uses.~~

8.20. Large scale commercial development proposals must incorporate a range of business unit sizes. The 2,500 square metre (gross external area) benchmark is established by the London Plan and given effect through this policy.[100] Lewisham's employment areas have very low vacancy rates which can make it difficult for businesses to find space to start up and grow. Provision for smaller units will help small business development particularly for Lewisham's creative, cultural and digital industries. More than 90 per cent of businesses in Lewisham are small businesses.[101] What constitutes a reasonable proportion of flexible workspace or small units will be considered on a case-by-case basis.

Commented [NE323]: Additional supporting text included to support new policy criterion B on securing flexible workspace

~~8.19.~~8.21. Development p~~P~~roposals for new live-work units (i.e. residential and employment uses in the same self-contained unit for semi-permanent or permanent occupation) will be refused, unless they are located within the Forest Hill Cultural Quarter, Endwell Road LSIS or Ashby Mews, Brockley. Monitoring indicates the loss of employment provision through consenting live-work accommodation, with development reverting to fully residential use over time. This policy helps to guard against such loss, recognising the need to protect ~~employment floorspace~~industrial capacity. Exceptions will be made for live-work development in the Forest Hill Cultural Quarter, Endwell Road LSIS and Ashby Mews, recognising that such provision has been successfully integrated into the area and contributes to its distinctiveness. In the case of mixed-use development including a commercial component, the employment floorspace must be demonstrably separate from other uses, including any residential elements, and dedicated solely to business uses.

[100] London Plan (2021) policy E2 (Providing suitable business space).
[101] Lewisham Local Economic Assessment (2018).

EC 4 ~~Providing suitable business space~~Low-cost and affordable workspace

A. Development proposals incorporating ~~business~~ workspace should ensure that provision is made for suitable types and sizes of units, at an appropriate range of rents, particularly to meet the needs of micro, small and medium sized businesses, including start-ups.

B. Where there is existing ~~provision of~~ low-cost ~~or affordable~~ workspace ~~on-site, this proposals should seek to~~ should be retained or re-provided ~~this. in any future redevelopment, also taking into account the specific circumstances set out in (C) below and Policy LNA3 (Lewisham North Creative Enterprise Zone).~~ Development proposals should use the design-led approach to explore options for retaining, re-purposing or creating new low-cost workspace that is designed to a high specification and will remain suitable for local businesses, including small businesses and those in the cultural, creative and digital industries. Low-cost workspace should be let at reasonable local market rates to encourage take-up of units and support business development, particularly by addressing financial barriers in access to workspace.

~~B.~~C. Development proposals that incorporate an element of affordable workspace~~,~~ at rents maintained below the market rate~~,~~ for ~~specific types of~~ social, cultural or economic uses will be considered favourably.

~~C.~~A. ~~Where there is existing provision of low-cost or affordable workspace on-site, proposals should seek to retain or re-provide this in any future redevelopment, also taking into account the specific circumstances set out in (C) below and Policy LNA3 (Lewisham North Creative Enterprise Zone).~~

~~D. Within the following locations, where there is existing provision of affordable workspace on-site, proposals will be required to retain or re-provide this workspace in any future redevelopment unless it can be demonstrated that the affordable workspace has been provided on a temporary basis (meanwhile use):~~

- ~~a. Designated employment areas (i.e. SIL, LSIS and MEL);~~
- ~~b. Major and District town centres;~~
- ~~c. The Creative Enterprise Zone; and~~
- ~~d. Railway arches.~~

~~E.~~D. New major commercial development proposals for Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and similar Sui Generis uses~~, including major mixed-use development incorporating commercial floorspace, will be required to~~ must make provision for affordable workspace. Developments must provide at least 10~~%~~per cent of the ~~new employment~~ rentable floorspace (Net Internal Area) as affordable workspace at 50 per cent of market rents. ~~This~~ Affordable workspace should be provided on-site. ~~wherever feasible. Further details will be set out in the Council's Planning Obligations Supplementary Planning Document~~. Off-site provision will only be acceptable where it is demonstrated to the satisfaction of the Council that on-site provision is not feasible or off-site provision will achieve greater economic benefits. Off-site provision will be secured through planning obligations with payments in lieu calculated using the formula set out in Table 8.2 (Affordable workspace payments in lieu). Payment in lieu

Commented [NE324]: Amended so this policy point deals only with low-cost workspace, with further clarifications added to aid implementation.

Affordable workspace, dealt with through remainder of the policy.

Commented [NE325]: Moved to B above

Commented [NE326]: Policy dealing with protection / loss of workspace re-sequenced (moved below), and amended to ensure conformity with London Plan.

contributions will be used to support the provision of affordable workspace in Lewisham. Further details will be set out in the Planning Obligations SPD.

Commented [NE327]: Amended to provide clarity and to aid policy implementation, also taking into account findings of the Viability Assessment update. This includes Table 8.2

Table 8.2 Affordable workspace payments in lieu

Formula for calculating payments in lieu
Step 1: C = A x B **Step 2: E = D x C** **Step 3: G = E x F** **Step 4: H = G – E** **Step 5: J = 1 / I** **Step 6; K = H x J**
A = Total lettable employment floorspace (square metres) B = Percentage of floorspace to be discounted C = Amount of floorspace subject to discount D = Market rent per square metre before discount E = Market rent for discounted floorspace before discount F = Percentage discount G = Rent after discount H = Value of discount I = Investment Yield J = Income Multiplier K = Capital value of discount

~~F.~~E. Where new affordable workspace is provided this must be secured for a specified period agreed ~~with~~ by the Council~~, with suitable arrangements in place to ensure the workspace is appropriately managed over this time. Affordable workspace will be secured by way of legal agreements or planning obligations.~~ In order to ensure that workspace is appropriately managed it must be provided in one of the following ways:

Commented [NE328]: Policy dealing with use of legal agreements and planning obligations re-sequenced and moved below.

a. Leased and managed by an affordable workspace provider approved by the Council, with an agreed Workspace Management Plan;
b. Managed directly by the owner, where it is demonstrated to the satisfaction of the Council that they have the necessary experience and expertise, with an agreed Workspace Management Plan;
c. Leased by the owner to an end user approved by the Council that requires non-managed workspace.

Commented [NE329]: Amended for clarity and to aid policy implementation – details on management arrangements

F. Development proposals that do not provide the required amount of affordable workspace must submit a Viability Assessment. The assessment will be subject to an independent appraisal paid for by the applicant. Proposals must provide the maximum viable amount of affordable workspace, the level of which will be determined by the Viability Assessment and capped at the requirement set out in (D) above. The Council will apply viability review mechanisms where development proposals do not provide the amount of workspace required by the policy.

Commented [NE330]: Respond to consultation - Additional criteria to aid policy implementation, and provide flexibility to respond to viability issues

G. Where there is existing affordable workspace this should be retained. Development proposals requiring planning permission that involve the loss of existing affordable workspace (including consented but undelivered workspace) will be refused unless the equivalent amount of affordable workspace is replaced on-site or re-provided

elsewhere in Lewisham. Affordable workspace that is replaced or re-provided must be of at least the same quality as the existing provision and secured on equivalent terms, or alternative terms agreed by the Council. In applying this policy consideration will be given to affordable workspace that has been secured on a temporary basis as a meanwhile use.

H. Affordable workspace will be secured through the use of planning obligations and/or legal agreements. Further details will be set out in the Planning Obligations SPD.

Commented [NE331]: Re-worked policy dealing with protection/loss of affordable workspace. Moved from previous criterion D.

Commented [NE332]: Moved from previous criterion F.

Explanation

Commented [NE333]: Supporting text amended throughout to align with policy changes above

~~8.20.~~8.22. Lewisham's Employment Land Study (2019) and Local Economic Assessment (2019) identify rising commercial sales and rental rates and the lack of low-cost and affordable workspace as an important issue in the Borough. ~~key barrier to entry in the local economy~~. The cost and availability of workspace can create a barrier to entry in the local economy and wider community, posing challenges for businesses and groups seeking to locate to, start-up or expand in Lewisham. This is particularly for micro, small and independent businesses as well as social enterprises, charities and voluntary organisations.~~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~~The Local Plan therefore seeks ~~that development~~to ensure that ~~protects~~ existing low-cost and affordable workspace ~~wherever possible~~is retained~~. Proposals including such new provision will be treated favourably~~ and that new provision is created as commercial development comes forward.

~~8.21.~~8.23. As set out in the ~~draft~~ London Plan, low-cost workspace refers to secondary and tertiary space that is available at open market rents, which is of a lower specification than prime space. This type of space is often located at the back of town centre sites, under railway arches and in smaller or constrained industrial sites. It accommodates traditional business sectors and, in Lewisham, 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. Clusters are also present along the ~~East London Line (~~Overground~~)~~ line corridor, for example, around Forest Hill and Brockley stations. However, the availability of low-cost workspace is increasingly limited~~,~~ given the Borough's diminishing employment land supply, rising market rates for commercial space and competing pressure on employment sites from higher value land uses.

8.24. Affordable workspace is workspace that is provided at rents maintained below the market rate. Like low-cost workspace, t~~T~~his type of workspace is important to support business ~~start-ups, particularly in the cultural and creative sectors~~ retention and development. For the successful delivery of the Local Plan there is an imperative to grow Lewisham's economic base~~,~~ and provision of affordable workspace will be integral to achieving this. Therefore, all major commercial

development, including mixed-use developments with a commercial component of 1,000 square metres or more gross, must ensure that 10~~%~~ per cent of new ~~employment floorspace~~workspace is delivered as affordable ~~floorspace~~ workspace. The level and rental rate of affordable workspace required by this policy can be viably delivered, as set out in the Lewisham Local Plan Viability Assessment (2022).

8.25. The policy applies to Use Class E(g) office and light industrial, B2 industrial and B8 storage and distribution uses. It will also apply to similar Sui Generis Uses however this will be considered on a case-by-case basis depending on the nature of the business activity. The Council will use discretion on a case-by-case basis in applying the policy to office space or other workspace that associated with community (social) infrastructure such as health, social care and education facilities.

~~8.22.~~8.26. Affordable workspace must be let at a discount of 50 per cent of the market rent over a period agreed by the Council. The market rent is the expected rent that would be achieved on the discounted space at market rates. Market rates (and therefore rents) should be established on the basis of robust evidence of the commercial market in Lewisham. Service charges should be set at a reasonable level that does not offset or adversely impact on the affordability of the workspace. The market rent and associated service charges will be assessed by the Council at the time of the application, taking into account the nature and location of the proposed development.

8.27. ~~We will seek that~~ Aaffordable workspace ~~is delivered~~should normally be provided on-site ~~as a priority~~. The policy sets out three options for delivering workspace to ensure it is appropriately secured and managed. Applicants should engage with workspace providers and representative groups, such as the Lewisham Workspace Providers Forum, early in the design-led approach. This will help to ensure the design is suited to the requirements of the end user(s) and can also assist with the identification of providers. Applications should include evidence of an agreement to lease the affordable workspace along with a Workspace Management Plan, where appropriate. ~~However~~ Fflexibility may be applied for equivalent off-site contributions~~,~~ in exceptional circumstances, including payments in lieu, where ~~this is suitably justified~~ it is demonstrated to the satisfaction of the Council that on-site provision is not feasible or off-site provision will provide greater economic benefits. Payment in lieu contributions, which will be secured using the formula set out in Table 8.2 (Affordable workspace payments in lieu).

8.28. ~~The workspace should be provided for a period agreed with the Council, and this may be secured by use of conditions or planning obligations. Applications will be expected to submit evidence of an agreement to lease the affordable element at less than market level rent, ideally working with a recognised affordable workspace provider. Where this requirement~~ Development proposals that do not provide the required amount of affordable workspace ~~cannot be satisfied, proposals~~ must submit evidence of a V~~v~~iability A~~a~~ssessment with the planning application. ~~demonstrating why a lower level or no such provision of affordable~~

Commented [NE334]: Repetition of policy. Point about evidence of lease agreement retained and moved into para 8.27

~~floorspace is deliverable. The viability assessment~~This must ~~be independently appraised and verified by~~ be undertaken by a suitably qualified professional, such as a member of the Royal Institution of Chartered Surveyors (RICS) ~~professional~~. The applicant's Viability Assessment will be subject to an independent appraisal paid for by the applicant. The assessment will be used to confirm the maximum viable amount of affordable workspace that should be provided, with the level capped at the amount set out in Policy EC4.D. Where the required level of affordable workspace is not provided the Council will apply early and late stage viability review mechanisms. This is to respond to economic uncertainties that may arise over the period of the development, and to ensure maximum public benefit is gained from it.

~~8.23.~~8.29. It is expected that affordable workspace will normally be provided as flexibly specified office or light industrial workspace.[102] Developments will also be encouraged to make provision for this type of space to contribute to meeting the Borough's identified needs for employment.[103] However there may be circumstances in which affordable workspace can be provided for Class B2 industrial or Class B8 storage and warehousing uses. In these cases a lower level of affordable workspace and/or discount rent may be permissible. This is recognising these types of industrial uses may exhibit lower land values, which can in turn impact on viability. Where appropriate, the amount of affordable workspace and discount rent value will be determined taking into account the nature of the use(s) and development viability.

EC 5 Strategic Industrial Locations

A. Development proposals within SIL will be supported where the uses fall within the industrial-type activities specified by the London Plan.

B. Development proposals ~~on sites~~ within or adjacent to ~~Strategic Industrial Locations~~SILs must not adversely impact on the functional ~~integrity~~ or effectiveness of the SIL ~~or prejudice the continued operation of~~to accommodate commercial and industrial uses ~~on the site or within the employment area~~ or their ability to function on a 24-hour basis.

C. Development proposals within SIL should protect and seek to make provision for business activities and uses that support the function of London's Central Activities Zone (CAZ).

D. ~~Proposals for the co-location of employment and other compatible uses will only be supported at selected SIL sites, and where it can be suitably demonstrated that the requirements of draft London Plan policies E5 (Strategic Industrial Locations) and E7 (Industrial intensification, co-location and substitution), and other relevant Local Plan policies, are satisfied.~~ The reconfiguration of the Surrey Canal Road SIL is facilitated

Commented [NE335]: Respond to public consultation – Local Plan must set out further details on the approach to managing SIL, particularly to ensure conformity with London Plan. A new standalone policy on SIL is included.

Commented [NE336]: Respond to consultation – stronger requirements for protection of amenity of business uses within SIL

Commented [NE337]: Respond to consultation – the Local Plan must make clearer how it will support the function of London's CAZ, in line with the London Plan

[102] The Lewisham Local Plan Viability Assessment (2022) has tested the viability of the policy on the basis of workspace being provided as office and light industrial floorspace.
[103] Lewisham Employment Land Study (2019).

through the Local Plan. Land at the Bermondsey Dive-Under is designated SIL to provide substitute industrial capacity for the release of SIL at Apollo Business Centre, Trundleys Road and Evelyn Court. These sites released from SIL are re-designated as LSIS where the co-location of employment and other compatible uses will be supported in line with Policy EC6 (Locally Significant Industrial Sites) and relevant site allocation policies.

~~Further detailed requirements are set out in the corresponding site allocation policies for the following sites:~~

- ~~Apollo Business Centre (Surrey Canal Road SIL)~~
- ~~Trundleys Road (Surrey Canal Road SIL)~~
- ~~Evelyn Court (Surrey Canal Road SIL)~~

Explanation

8.30. Lewisham contains two designated SILs at Surrey Canal Road and Bromley Road. The London Plan requires boroughs to proactively manage and sustain SILs as the region's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy. This policy ensures that Lewisham's SILs are safeguarded and their economic function is enhanced and not compromised by new development.

8.31. Lewisham's SILs make up a significant proportion of the Borough's industrial capacity and are key areas for business activity and local jobs. They are also well-positioned to play a more integral role in supporting the London CAZ[104] which is a driver of the regional economy. Both SILs benefit from their proximity to central London and the wider south-east of England, including good transport connections. In addition, Lewisham features growth sectors which complement the CAZ, such as the cultural, creative and digital industries. Development proposals should protect and seek to make provision for activities and uses that support the CAZ. This includes industrial capacity for logistics and last mile distribution, 'just-in-time servicing' and other related functions as SIL are the most appropriate locations in the borough for these types of activities.

8.32. The New Cross Area Framework and Lewisham Employment Land Study (2019) identify opportunities to consolidate and intensify employment uses at Surrey Canal Road. To secure the long-term viability of industrial land within this area the reconfiguration of SIL is facilitated through the plan-led process. ~~of employment floorspace and to help facilitate the renewal of SIL and LSIS, we will support proposals for the co-location of employment and other compatible uses on selected sites at the Surrey Canal Road SIL, as identified in Policy EC2.C above and within LSIS, as set out in Policy EC5 (Locally Significant Industrial Sites). The co-location of~~New SIL ~~land will be enabled through replacement provision made~~ is designated at the Bermondsey Dive-~~-~~Under ~~site, which will be newly designated SIL~~which provides substitute capacity for SIL released at Apollo Business Centre, Trundleys Road and Evelyn Court. The South Bermondsey Dive-Under

[104] Lewisham Local Economic Assessment. 2018.

Commented [NE338]: Respond to consultation – further details on how reconfiguration of SIL will be delivered, An additional site allocation for the Bermondsey Dive Under site will be included in Part 3 of the plan, which will safeguard it for uses appropriate for SIL.

Commented [NE339]: Policy supporting text included to justify approaches in new SIL policy above.

masterplan (2019) demonstrates that industrial development can feasibly be delivered there. Those sites released from SIL are re-designated as LSIS in order to ensure they continue to function principally as employment locations. Their redevelopment will provide a positive transition in character and use from the surrounding residential areas to the commercial and industrial core of the SIL. Further details are set out in Policy EC6 (Locally Significant Industrial Sites). ~~Site allocation policies have been prepared for these sites to ensure that co-location is coordinated and appropriately managed through the plan-led and site masterplan process.~~

EC ~~5~~6 Locally Significant Industrial Sites ~~(LSIS) – formerly LEL~~

A. ~~Locally Significant Industrial Sites~~LSIS will be protected for Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution and ~~a range of Class B Uses (B1, B2 and B8) along with appropriate~~ related Sui Generis uses, with priority being given to ~~Class B1~~office and light industrial uses. Development proposals should ensure that there is no net loss of industrial capacity within these locations~~,~~ and seek to deliver net gains wherever possible.

B. 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.

~~B.~~C. Within LSIS, development proposals for self-storage and large~~r~~ format storage and warehousing uses and facilities will only be ~~supported~~ permitted ~~in exceptional circumstances~~ where:

a. The requirements of Policy EC2.B(d) (Protecting employment land and delivering new workspace) are satisfied; or

~~a.~~b. There is a demonstrable local need or market demand for ~~this~~ the ~~type of~~ use proposed;

~~b.~~c. The use cannot be reasonably located in a ~~Strategic Industrial Location~~SIL, as evidenced by a detailed site selection exercise; and

~~c.~~d. The development will include provision of ~~an element of floorspace~~a reasonable proportion of flexible workspace or units for micro, small or medium-sized businesses.

~~C.~~D. The co-location of employment and other compatible uses will only be ~~supported~~ permitted at selected LSIS ~~locations. This is~~ in order to secure the long-term viability of LSIS ~~sites~~ and to help facilitate their renewal and regeneration. Development ~~P~~roposals ~~for~~ involving the co-location of uses ~~should~~ must not compromise the function~~al integrity~~ of the LSIS ~~as an employment location~~in line with (B) above. Further development requirements are set out in site allocation policies for the following sites:

a. Apollo Business Centre

~~a.~~b. Blackheath Hill

~~b.~~c. Childers Street North

d. Clyde Vale

~~c.~~e. Evelyn Court

Commented [NE340]: Amended to reflect appropriate uses in light of new Use Classes Order

Commented [NE341]: Included to make clear the need to protect the function of LSIS

Commented [NE342]: This is a point addressing redevelopment/improvement to existing storage and warehousing uses

~~d.~~f. Lower Creekside
~~e.~~g. Manor Lane (Part)
~~f.~~h. Perry Vale
~~g.~~i. Stanton Square
j. Trundleys Road
~~h.~~k. Willow Way
~~i.~~l. Worsley Bridge Road

~~D.~~E. Development p~~P~~roposals for the co-location of uses on LSIS sites listed in ~~(C~~EC6.D~~)~~ above which result in the net loss of industrial capacity will be strongly resisted and only permitted in exceptional circumstances, where the proposal:

a. Suitably demonstrates that the loss is necessary for reasons of feasibility or to secure strategic infrastructure, with reference to Policy EC6.G , and the amount of industrial capacity has been ~~minimised~~ maximised as much as reasonably practical, including through evidence of a development options appraisal considered through the design-led approach;
b. Will not compromise the function~~al integrity~~ of the LSIS or preclude the delivery of the spatial strategy for the B~~b~~orough;
c. Delivers wider public benefit(s) to overcome the loss of industrial capacity; and
d. Makes provision of at least 50 per cent affordable housing on the residential element of the development.

~~E. For LSIS listed in (BD) above, where an approved site-wide masterplan is not in place, development proposals for non-employment uses will be assessed against the criteria in (FG) and (GH) below, which also apply to all proposals for all other LSIS locations (i.e. not listed in (BD) above).~~

F. ~~Within~~ On LSIS where the co-location of uses is not permitted by Policy EC6.D development proposals ~~for non-employment uses (i.e. those outside of the B Use Class~~ which are not for Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution and similar Sui Generis uses~~)~~ will only be supported where they:

a. Are not residential uses;
b. Are complementary and ancillary to the principal function of the LSIS in accommodating commercial and industrial uses or infrastructure necessary to support the delivery of the spatial strategy, with reference to Policy EC6.G;
c. ~~Are necessary to~~Will support the long-term viability of the LSIS as an employment location, including through provision of services and facilities that meet the needs of modern business;
d. Will not adversely impact on the function~~al integrity~~ of the LSIS or prejudice the continued operation of commercial and industrial uses on the site, ~~or~~ within the LSIS and in neighbouring employment areas, including those outside of the Borough;
e. Do not result in an overconcentration of similar uses in the LSIS and its immediate or wider surrounds; and

Commented [NE343]: Land released from will be re-designated LSIS in order to protect industrial capacity and the employment generating function of these sites – 3 sites therefore included as additions to LSIS. This is consistent with the relevant site allocation policies set out in the Regulation 18 document, where employment-led mixed-use redevelopment is supported in principle.

Commented [NE344]: Respond to consultation. Removed for clarity – within selected LSIS, all sites for co-location (including non-commercial and industrial uses) must be delivered through a masterplan, as set out in Policy DM3 (Masterplans and comprehensive development). The removal of this criterion will help to avoid confusion, so that F deals only with proposals on LSIS where co-location is not permitted.

Commented [NE345]: Amended to reflect appropriate uses in light of new Use Classes Order

Commented [NE346]: Respond to consultation – impacts on employment areas outside the borough should be considered

f. Will not compromise the delivery of strategic requirements for ~~employment floorspace~~industrial capacity, having regard to the proposal's individual and cumulative impact.

G. Within LSIS, development proposals for strategic infrastructure will be ~~acceptable~~ permitted where it is demonstrated that:

a. The infrastructure is necessary to support the delivery of the spatial strategy for the Borough, taking into account the Council's Infrastructure Delivery Plan;

b. The use is appropriate to the industrial location and will not adversely impact on the function~~al integrity~~ of the LSIS or prejudice the continued operation of commercial and industrial uses on the site or within the employment area; and

c. The loss of industrial capacity has been minimised as much as reasonably practical~~,~~ and efforts have been made to replace any such losses.

Explanation

~~8.24.~~8.33. ~~Locally Significant Industrial Sites (LSIS) were formerly designated in the Core Strategy as Local Employment Locations (LELs). Their terminology has been updated for consistency with that used in the London Plan for sites of this function.~~ LSIS play an important role in the local economy as a key source of the Borough's industrial capacity and jobs. Lewisham's Employment Land Study (2019) confirms the need to protect LSIS over the long-term and sites ~~have~~ are therefore ~~been~~ safeguarded by the Local Plan ~~in line with Policy EC2 (Protecting employment sites and delivering new workspace)~~. New development within LSIS should be predominantly for ~~industrial and commercial uses in the B Use Class,~~ Class E(g) office and light industrial uses with priority given to ~~Class B1~~light industrial uses~~, as discussed below~~.

~~8.25.~~8.34. In order to make the ~~best~~ optimal use of land there will need to be a managed process of ~~employment site~~industrial land renewal and intensification. The Lewisham Employment Land Study (2019) provides that the Borough's future requirements are primarily for ~~Class B1~~office and light industrial uses. To ensure LSIS help to meet these identified needs w~~W~~e will ~~therefore seek to~~ resist development proposals ~~in LSIS~~ that ~~are~~ consist solely or predominantly ~~for~~ of self-storage or large~~r~~ format warehousing and storage facilities (normally included in the B8 Use Class) unless sufficiently justified~~. Their built formats of warehousing units or self-storage facilities often do not provide for flexible re-use and are characterised by low employment densities, with limited opportunities for jobs compared to other development typologies. We need to ensure that these larger scale storage uses do not predominate on what is, in Lewisham, a very limited supply of employment land.~~ ~~However, it is acknowledged that s~~Storage ~~facilities~~ and warehousing uses can help to support the wider regional economy, particularly the logistics sector which is vital to the long-term viability of London's CAZ. They also provide valuable space for smaller businesses and ~~businesses~~ those requiring additional off-site provision. ~~We will therefore consider~~Development proposals ~~where applicants can~~show must demonstrate there is an identified need or local market demand for the warehousing or storage

Commented [NE347]: Not required for Regulation 19 plan

Commented [NE348]: Respond to consultation – evidence to suggest that B8 uses make an important contribution to local economy and in some instances provide reasonable job densities. Supporting text therefore focuses principally on meeting identified needs.

use~~. Proposals must also demonstrate~~ and that there are no suitable or available sites in SIL, where this type of development can be more appropriately located. ~~This~~ Proposals should include evidence of market research showing there is demand for the use and where possible, a specified occupier. This will help to prevent speculative developments for which there is unlikely to be an end-user. They should also submit a detailed site survey investigating availability of suitable sites both within and in proximity to Lewisham, including ~~its~~ in neighbouring Boroughs and ~~in those in~~ the London southeast sub-region. All development proposals for ~~large format~~ storage and warehousing ~~should~~ must deliver ~~an element~~a reasonable proportion of flexible workspace or units to meet needs of micro, small and medium sized business, the amount of which will be considered on a case-by-case basis.

~~8.26.~~8.35. To secure the long-term viability of ~~employment floorspace~~LSIS and to help facilitate their renewal ~~of LSIS land, we will~~ the Local Plan provides in-principle support ~~proposals~~ for the co-location of employment and other complementary uses on selected sites, as identified in Policy EC~~5~~6.~~B~~ D above. Site allocation policies have been prepared for these sites to ensure that co-location is coordinated and appropriately managed through the masterplan process, particularly to ensure that the function of the LSIS is not eroded by piecemeal development. ~~Our expectation is that there will be no net loss of employment floorspace capacity through the co-location process. Where the site is vacant or cleared, the baseline figure should be established using the last active authorised use (excluding meanwhile uses). In Lewisham, industrial capacity for LSIS is defined as existing commercial floorspace on site or the benchmark potential commercial floorspace that could be accommodated on site at a 65 per cent plot ratio (whichever is greater). In applying the policy principles consideration will be given to the characteristics and operational requirements of different industrial uses, and in particular, yard and servicing space that is often essential for some commercial and industrial uses. Through the design-led approach, proposals should consider how to maximise provision of floorspace capacity through the layout and configuration of buildings and spaces, in line with Policy EC3 (Location and design of new workspace).~~ Masterplans for LSIS should be prepared with reference to Policy DM3 (Masterplanning and comprehensive development) along with relevant London Plan guidance, including the Practice Note on industrial intensification and co-location.[105]

~~8.27.~~8.36. Where the co-location of uses on LSIS identified in Policy EC~~6~~5.~~C~~ D is proposed, development should be designed to ensure there is no net loss of industrial capacity with reference to Policy EC2 (Protecting employment land and delivering new workspace), and to seek net gains wherever possible. The net loss of industrial capacity will only be considered in ~~very~~ 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

[105] Greater London Authority. Industrial Intensification and Co-location Through Plan-led and Masterplan Approaches. Practice Note (2018).

Commented [NE349]: Respond to consultation and for conformity with London Plan – plan should refer to industrial capacity not floorspace, yard space, etc. The information on calculating industrial capacity has been moved to Policy EC2 and paragraphs 8.10 and 8.11, so this covers all employment areas not just LSIS.

Commented [NE350]: Respond to consultation – Local Plan should refer relevant London Plan guidance

must include evidence of different site layout, design and development typologies considered through the design-led approach~~, taking into account individual site circumstances such as location and site configuration~~. 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 ~~demonstrating~~ demonstrate that a wider public benefit ~~would~~ 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 ~~draft~~ London Plan policy ~~H5~~ H4 (Delivering affordable housing).

~~8.28. In the interim period where a site-wide masterplan has not been approved or agreed by the Council,proposals for non-employment uses within LSIS will be resisted unless they meet the criteria of Policy EC5.E. This is to ensure that the employment generating function of LSIS land remains intact and is not eroded by the piecemeal introduction of non-employment uses.~~

~~8.29.~~8.37. Whilst LSIS is protected for ~~Class B and appropriate Sui Generis Uses~~office and industrial uses it is recognised that other employment generating ancillary uses can help to support the attractiveness and viability of an employment site. Such uses may include small-scale workplace crèches, cafes, business services, community facilities and public amenity spaces. ~~We will consider~~The acceptability of development proposals for such ~~non-employment~~ uses ~~on their individual merits, having regard to site circumstances~~will be considered on a case-by-case basis. ~~The intention is to ensure that~~ LSIS should remain attractive and viable places for business ~~and that other uses do not compromise their predominantly commercial and industrial function.~~

~~8.30.~~8.38. ~~All d~~Development ~~on LSIS land~~ must ~~be sensitively integrated into the site and its surrounds and~~ not adversely impact on the function and effectiveness of LSIS or otherwise prejudice the continued operation of industrial and commercial uses. ~~To safeguard local economic interests, we will resist~~Development proposals ~~that~~ should avoid harm to function of the LSIS by ensuring that they will not result in an overconcentration of ~~similar or other~~ non-commercial or inappropriate main town centre uses. Proposals will therefore be considered having regard to the cumulative impact of ~~any non-employment~~ uses which are not Class E(g) office and other industrial uses. Many LSIS are located in proximity to town and local centres or transport hubs. Applications should therefore give consideration to the necessity of providing a ~~non-commercial~~ main town centre use within the LSIS where there may be similar ~~accessible~~ provision or available sites nearby.

EC ~~6~~7 Mixed-use Employment Locations ~~(MEL)~~

A. The comprehensive redevelopment of Mixed-use Employment Locations will be supported in order to facilitate their renewal and regeneration and to secure provision for a range of commercial uses, including ~~of~~ new modern workspace~~,~~ with priority given to Class E(g) office and light industrial uses. All development proposals within

Commented [NE351]: Repetition

Commented [NE352]: Respond to consultation – impacts on employment areas outside the borough should be considered

Commented [NE353]: Deleted – to align with changes to policy above

Commented [NE354]: Repetition - Captured in paragraph below

Commented [NE355]: Repetition – covered elsewhere in plan

Commented [NE356]: Respond to consultation – greater flexibility should be provided recognising role of MELs in delivering mixed use development. The policy now makes clear that commercial uses supported, and where workspace is provided priority given to office and light industrial

Commented [NE357]: Amended to reflect appropriate uses in light of new Use Classes Order

MELs must be delivered in accordance with relevant site allocation policies and a site-wide masterplan. Development proposals ~~will be expected to~~must provide demonstrable improvements in the overall physical and environmental quality of the MEL~~,~~ and ensure that new development is well~~-~~integrated with adjoining and neighbouring land uses.

B. ~~All new d~~Development proposals ~~will be expected to~~must ~~protect and enhance the employment generating~~not adversely impact on the function or effectiveness of MEL~~s land~~ to accommodate business uses. Development proposals ~~will be required to~~must maximise the amount of Class ~~B1 employment floorspace.~~ E(g) office and light industrial uses through site redevelopment, along with providing a demonstrable and significant uplift in the number ~~and quality~~ of jobs. Development p~~P~~roposals ~~will be expected to~~must make provision for ~~new modern~~ high quality workspace and ~~associated operational land (including yard and servicing space) and to~~ ensure that this ~~element~~ is appropriately integrated within the MEL and its surrounding area.

C. Where the comprehensive development of an MEL, or a site within the MEL, has been delivered through the masterplan process~~,~~ all future proposals involving the redevelopment or change of use of land and floorspace must:
   a. Retain, and wherever possible seek to increase, the proportion of industrial capacity ~~(including Class B floorspace)~~ across the MEL, as originally approved in the masterplan and planning consent; and
   b. Ensure there is no net loss of existing industrial capacity.

Explanation

~~8.31.~~8.39. Mixed-use Employment Locations ~~were first designated in Lewisham's Core Strategy (2011). These locations~~ consist~~ed~~ largely of older, poorer quality and redundant industrial land~~,~~ and buildings ~~and uses that were~~ are often ~~incompatible with their neighbouring residential areas~~. To help facilitate regeneration in the north of the Borough~~, the Council made~~ the Local Plan makes provision for the plan-led consolidation and redevelopment of MEL~~s land~~. ~~The key aim was to~~This will assist in tackl~~e~~ing deprivation and inequality by improving the quality of the ~~urban~~ environment, delivering new housing (including affordable housing), jobs and training opportunities, and securing investment in ~~strategic transport and community~~ infrastructure such as for public open space, community facilities and transport. ~~To support mixed and inclusive communities, and to safeguard industrial capacity, the local plan policies required new development on MELs to deliver 20 per cent of new built floorspace as employment floorspace.~~

~~8.32.~~8.40. ~~Since the Core Strategy came into effect a~~A number of MELs have come forward for redevelopment in recent years (with building works having started and/or completed on some sites, and planning consent granted on others). ~~Developments have made provision for new modern and improved employment floorspace, including affordable workspace. However, monitoring information indicates that the 20 per cent requirement has not always been achieved on committed sites. This is mainly owing to the introduction of taller and tall buildings with significant amounts of residential floorspace on some sites, presenting~~

Commented [NE358]: Amended to reflect appropriate uses in light of new Use Classes Order

Commented [NE359]: Respond to consultation – problematic in terms of implementation as criteria needed to assess quality. In addition, flexibility should be provided to ensure that scope for employment opportunities for people with different qualification levels.

Commented [NE360]: This policy is amended to refer high quality workspace – the requirements for which are set out in Policy EC3 high quality employment areas and workspace

Commented [NE361]: Not required for Regulation 19 plan

~~feasibility challenges for meeting the proportionate employment floorspace thresholds. However,~~ Tthe delivery of new modern workspace in mixed-use schemes has been demonstrated to be viable~~,~~. ~~with new~~Recently completed schemes have ~~contributing to transformational~~generated significant inward investment in the local area and enabled the renewal of MEL land. We therefore remain committed to the plan-led consolidation of MELs to support growth and regeneration, consistent with the London Plan objectives for Lewisham's Opportunity Areas.

~~8.33.~~8.41. The Lewisham Employment Land Study (2019) provides that MELs ~~locations~~ should continue to be protected for employment generating uses. ~~Therefore, they have been~~MELs are therefore safeguarded in line with Policy EC2 (Protecting employment ~~sites~~ land and delivering new workspace), whilst recognising their ongoing role in supporting ~~strategic~~ regeneration ~~objectives~~. This policy should be read in conjunction with relevant site allocation policies~~, which set out further detailed site development principles, requirements and guidelines~~. These reflect the key role of MELs have in contributing to the delivery of the spatial strategy~~. In particular, to~~ and supporting ~~the creation and enhancement of~~ inclusive, ~~well-connected, mixed~~ healthy and liveable neighbourhoods in the Deptford and New Cross areas.

~~8.34.~~8.42. ~~MELs are important to the achievement of the Local Plan objectives and have significant potential to deliver new modern workspace in the Borough. We will therefore seek to ensure that development maximises the amount of new employment floorspace provided by the redevelopment of sites~~. Development proposals must be delivered t~~T~~hrough the masterplan process, with reference to Policy DM3 (Masterplans and comprehensive development). ~~applicants will be expected to~~Proposals must ~~provide evidence of efforts made to~~demonstrate how they will maximise provision of industrial capacity whilst addressing the role MELs have in delivering a complementary mix of uses. This should include evidence of the site layout and design options explored through the design-led approach, along with consideration given to a different workspace typologies (~~e.g.~~for example, light industrial space or office space suitable for~~,~~ co-working~~), incubator or accelerator space), and nature of employment uses~~.

~~8.35.~~8.43. Comprehensive redevelopment of MEL land must provide for a demonstrable uplift in the number of jobs, both within the site and across the MEL. Employment uplift will normally be considered against the applicant's evidence of the number of jobs provided by the most recent authorised use on the site. Where land is vacant or a site has been cleared, the baseline jobs figure should be established using the last active authorised use. What comprises a 'significant uplift' in the number of jobs~~, in line with Policy EC6.B,~~ will be considered on a case~~-~~by~~-~~case basis, taking into account individual site circumstances. At a minimum, applicants should demonstrate that the new development will deliver a higher employment density and an increase in the number of jobs. Notably, jobs secured during the planning, design and construction phases will not count towards the uplift, which must be calculated for the operational phase of development, and limited to on-

Commented [NE362]: Not required for Regulation 19 plan

Commented [NE363]: Removed – this is implied in healthy and liveable neighbourhoods and captured elsewhere in the plan

Commented [NE364]: Repetition – this is reflected in the policy

site employment provision secured only. The quality of employment provision will also be taken into account when considering proposals.

~~8.36. In line with Policy EC3 (Location and design of new workspace) it is expected that all new development will make provision for high quality and flexibly designed workspace, including an appropriate fit out. Consideration will need to be given to the layout of development in accommodating different uses, including the functional relationship and interface between them, at the early stage in the planning and design process. This will help to ensure the workspace provision is appropriately integrated and can be viably maintained over the long term.~~

Commented [NE365]: Repetition – workspace design in covered elsewhere in the plan

~~8.37.~~8.44. The comprehensive mixed-use redevelopment of some MEL sites has now been realised, for example, at Plough Way[106] ~~(Core Strategy Strategic Site Allocation 5)~~. It is important that the new employment provision secured here, and at other such recently delivered MEL sites, is retained over the long term. ~~We will strongly resist any f~~Future proposals for redevelopment of any part of an MEL site, including changes of use, ~~which would~~must not result in a net loss of the ~~employment floorspace and~~ industrial capacity originally consented through the masterplan and planning approvals process. Where redevelopment or a change of use is acceptable in principle, development proposals should seek opportunities to provide net gains in workspace and jobs.

EC ~~7~~8 Non-designated employment sites

A. Non-designated employment sites are those that contain or consist principally of Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution and similar Sui Generis uses, and which are located outside of SIL, LSIS and MEL. These sites make an important contribution to Lewisham's local economy by providing workspace for businesses and job opportunities. Development proposals should protect and not result in the net loss of viable industrial capacity on these non-designated employment sites.

B. To ensure the continued viability of non-designated employment sites, development proposals for employment-led, mixed-used development will be supported where ~~a site is~~they are located within a ~~highly accessible location~~well-connected area with high Public Transport Access Levels, or the site forms part of a cluster of commercial, industrial and/or other employment generating uses, and the development:

Commented [NE366]: Amended for clarity and to aid policy implementation

   a. Maximises the amount of industrial capacity ~~provided, including employment floorspace~~;
   b. Provides demonstrable improvements in the site's suitably for continued employment use, having particular regard to Policy EC3~~.C~~ (~~Location and design of new~~High quality employment areas and workspace);
   c. Does not compromise the employment generating function of the site and any adjoining or nearby sites, particularly where they form part of a complementary cluster of uses;

[106] Lewisham Core Strategy (2011). Site Allocation 5 made provision for the comprehensive redevelopment of the MEL at Plough Way.

d. Ensures appropriate protection of amenity both for the users of the development and neighbouring properties, with reference to the Agent of Change principle; and
e. Secures the provision of affordable housing for any residential element introduced, including through building conversions, in line with Policy HO3 (Genuinely affordable housing).

C. On all other non-designated employment sites (i.e. those which fall outside the location requirements in (B) above) development proposals ~~should~~ must not result in the net loss of viable industrial capacity, unless it can be demonstrated that the building or site is not suitable for continued business use having regard to:
   a. Feasible alternative commercial, industrial and/or employment generating uses;
   b. The condition of the existing building(s) and reasonable options for the refurbishment and/or reconfiguration of floorspace to enable continued occupation by employment generating uses;
   c. Site constraints including layout, access and compatibility with neighbouring uses;
   d. Long-term vacancy; and
   e. Evidence of recent and continuous marketing, covering a minimum period of 24 months and at an appropriate rental or sale value.

D. On sites where the introduction of a residential element is acceptable in line with (C) above, development proposals ~~will be required to secure the~~must make provision ~~of~~ for affordable housing, in line with Policy HO3 (Genuinely affordable housing).

E. ~~Where d~~Development proposals involving~~e~~ the net loss of industrial capacity must make a financial contribution towards training or other employment related initiatives ~~will be sought~~, in line with Policies EC~~9~~10 (Workplace training and job opportunities) and DM2 (Infrastructure funding and planning obligations).

Explanation

~~8.38.~~8.45. There are a number of ~~smaller~~ employment sites located outside of the Borough's designated employment areas ~~that support a range of commercial, industrial and other employment generating uses. Both individually and cumulatively, T~~these sites may either contain or consist principally of commercial and industrial uses. They play an important role in the local economy through their offer of complementary business services and activities~~,~~ as well as providing a source of local job opportunities. ~~However~~ The Lewisham Employment Land Study (2019) and Council's Authority Monitoring Reports indicate that these non-designated employment sites are under increasing pressure from higher value land uses, such as housing. There is a risk that the employment function~~al integrity~~ of these sites will be compromised or lost without an appropriate level of protection. ~~We~~ The Local Plan ~~will~~ therefore seeks to safeguard these sites for employment use~~. and strongly resist proposals involving the loss of industrial capacity.~~ However, it is recognised that flexibility is needed to respond to market signals, ensuring that ~~a site~~land is not unnecessarily protected when there is no

reasonable prospect of it remaining in employment use. In determining whether land is a non-designated employment site the Council will refer to planning and Business Rate records to identify whether the land and buildings are in business use, or were last authorised for business use.

~~8.39.~~8.46. To help maintain the viability of non-designated employment sites, ~~we will~~the Local Plan provides support ~~proposals~~ for employment-led, mixed-used redevelopment where a site ~~within a highly accessible location~~is located within a well-connected area or ~~the site~~ forms part of a cluster of employment generating uses. This includes sites within town centre or edge~~-~~ of ~~-~~centre locations, or where several employment, retail or related community or cultural uses in proximity to one another form a cluster of complementary activities. A benchmark distance of 800 metres (roughly 10~~-~~minutes walking distance) between uses will be applied as a guideline. All applications for such enabling development must be accompanied by an assessment that demonstrates the mixed-use scheme is necessary for reasons of financial viability (i.e. a non-employment use is required to make employment development viable). ~~Where there is a net loss of employment floorspace, we will seek that any residential element makes provision for affordable housing, in line with Policy HO3 (Genuinely affordable housing).~~ The V~~v~~iability ~~-~~A~~a~~ssessment must be independently appraised and verified by a Royal Institution of Chartered Surveyors (RICS) professional.

Commented [NE367]: Repetition – requirements for affordable housing set out in Part 2 section on housing

~~8.40.~~8.47. ~~In considering proposals, we will seek that~~Development proposals must provide the maximum reasonable amount of floorspace ~~is delivered~~ taking account of the minimum amount of non-commercial floorspace needed to make development viable. Proposals should clearly set out the net change in industrial capacity resulting from the development, ~~including~~ distinguishing between ~~operational land and~~ floorspace and yard space in the planning statement[107], along with an indication of the number of jobs to be accommodated by the new employment element. Proposals should seek to increase employment densities to realise net gains in jobs even where the amount of ~~floorspace~~ industrial capacity is diminished.

~~8.41.~~8.48. Where enabling mixed-use development is proposed, is important that uses do not impact on the employment function~~al integrity~~ of the site or inhibit its ability to continue supporting commercial uses, in line with the Agent of Change principle. Furthermore, development ~~will be expected to~~must make appropriate provision for flexible or adaptable workspace including an internal fit out of buildings, in line with the requirements of Policy EC3 (~~Location and design of new~~High quality employment areas and workspace).

~~8.42.~~8.49. Elsewhere in the Borough, we will seek to safeguard viable non-designated employment sites for employment generating uses. Changes of use will only be permitted where it is satisfactorily demonstrated that a building or site is not viable for employment development, as justified through an active and continuous marketing campaign. In line with London Plan Supplementary Planning Guidance,

[107] This is necessary for monitoring purposes.

the minimum time period for marketing should be for at least two years. However we may apply this requirement more flexibly based on individual site circumstances. ~~All development and uses will need to be sensitively integrated into the locality and positively contribute to amenity.~~

~~8.43.~~8.50. Where development proposals involve the net loss of ~~employment floorspace~~industrial capacity a financial contribution towards training or other employment related initiatives will be ~~sought~~required, in line with Policies EC~~9~~10 (Workplace training and job opportunities) and DM2 (Infrastructure funding and planning obligations).

EC ~~8~~9 Railway arches

A. Development proposals involving railway arches will be supported where:

a. The principal use is for an appropriate commercial, ~~or~~ industrial, community, cultural or similar Sui Generis use, or ~~otherwise for~~

b. A~~a~~n operational use associated with the railway or public highway; and

~~a.~~c. The use will not cause harm to the amenity of neighbouring uses and properties.

~~b. They do not obstruct or have an adverse impact on the public highway and railway network;~~

~~c. They have fully investigated and maximised opportunities to improve accessibility through by walking and cycling in the local area, including connections through the arches, where appropriate;~~

~~d. The design of development is appropriate to its setting, including positive frontages in town and edge-of-centre locations; and~~

~~e. Existing lower-cost or affordable workspace is retained or re-provided, in line with Policy EC4 (Providing suitable business space~~Low cost ~~and affordable workspace).~~

B. Existing lower-cost or affordable workspace within railway arches should retained or re-provided, in line with Policy EC4 (Low-cost and affordable workspace).

C. Development proposals involving railway arches must be of a high quality design. Positive frontages must be provided in town and edge-of-centre locations and elsewhere wherever possible. Proposals must also investigate and maximise opportunities to improve accessibility by walking and cycling, including connections through arches where feasible and appropriate.

~~B.~~D. Proposals involving the comprehensive redevelopment of sites that include, or are adjacent to, railway arches ~~will be expected to~~must address the use of the arches through the design-led approach, and where relevant the masterplan process.

~~C.~~E. Development proposals involving railway arches must demonstrate they will not have an adverse impact on the public highway and railway network or preclude the delivery of planned transport infrastructure. Network Rail, ~~and~~ Transport for London and the Highway Authority should be consulted on development and design options through the design-led approach~~to ensure that development will not~~

Commented [NE368]: Repetition – workspace design covered elsewhere in plan

Commented [NE369]: Respond to consultation and for conformity with London Plan – plan should refer to industrial capacity not floorspace, yard space, etc.

Commented [NE370]: Amended to broaden scope of appropriate uses to include community and cultural uses

Commented [NE371]: Absorbed into E involving transport matters

Commented [NE372]: Absorbed in C dealing with design matters

Commented [NE373]: Absorbed into C dealing with design matters

Commented [NE374]: Moved to new B below

Commented [NE375]: Design points above merged into new policy criterion

~~adversely impact on the public highway and rail network, or preclude the delivery of planned transport infrastructure.~~

Commented [NE376]: Moved to front end of policy

Explanation

~~8.44.~~8.51. There are a number of railways intersecting the Borough, some of which are supported by arches at points including within designated employment areas and town centres. There are opportunities to maximise the use of the space within these arches and the ancillary land adjacent to them. Many arches are already being used for a variety of commercial and industrial uses, with some providing low-cost and affordable workspace. This provision is important to smaller and independent businesses~~,~~ including those in the creative and cultural industries. We will support the continued use of arches in this way and work with stakeholders to maximise opportunities for new or enhanced workspace and commercial floorspace ~~that is appropriate to its location~~. Appropriate uses for railway arches will be determined on a case-by-case basis having regard other Local Plan policies which set parameters for managing uses with town centres, designated employment locations and non-designated employment sites.

~~8.45.~~8.52. All development proposals should help to improve the quality of the environment, make a positive contribution to local character and protect the amenity of neighbouring properties. Where railways sever or impede local area connections, proposals will be expected to fully investigate opportunities to open up arches and introduce walking and cycle routes to improve accessibility. In the case of major applications, including the comprehensive redevelopment of sites, railway arches should be considered through the site masterplan process, even if the arches are not included within the development site boundary. This will help to ensure land and space is put to its optimal use and supports delivery of the spatial strategy. Applicants will be expected to consult Network Rail and Transport for London on development and design options in order to ensure there is no adverse impact on the public highway and rail network, or preclude the delivery of planned transport infrastructure, including the Bakerloo line extension.

EC ~~9~~10 Workplace training and job opportunities

Commented [NE377]: Policy amended throughout to provide further details to aid effective implementation

A. The Council will work with stakeholders, including the Mayor of London, the London Economic Action Partnership, and Lewisham Deal Partners t~~T~~o support the Local Plan objectives for delivering a thriving and inclusive local economy~~,~~.

~~A.~~B. ~~new d~~Development proposals ~~is encouraged to~~ should make reasonable efforts to actively source local businesses, recruit local workers and ~~make available job and~~ provide workplace training, skills development, apprenticeships and other education and training opportunities ~~to~~ for Lewisham residents. Consideration should be given to opportunities during the construction and end-user phases of development. Development proposals that demonstrate there are suitable arrangements in place to secure local labour and workplace training will be considered favourably.

B.C. All proposals for Mmajor development will be required to provide job andproposals must make provision for workplace training opportunities toin Lewisham residents, including apprenticeships. A financial contribution will be required using the formula set out in Table 8.3 (Financial contributions for workplace training). This will be secured by way of conditions or planning contributions. and used to support the Council's local labour scheme and associated projects.

D. In line with other Local Plan policies, dDevelopment proposals involving a net loss of employment floorspaceindustrial capacity in designated employment locations and non-designated employment sites will be resisted, unless such loss is part of a plan-led process of employment land consolidation. Where new a development proposal will results in a net loss of employment floorspaceindustrial capacity, a financial contributions will be sought towards local employment and training initiativesrequired for workplace training, using the formula set out in Table 8.3 (Financial contributions for workplace training). This will to be secured through by conditions or planning contributions. and used to support the Council's local labour scheme and associated projects.

Commented [NE378]: Policies amended to aid effective implementation, also taking into account findings of the updated Local Plan Viability Assessment (2022). This includes Table 8.3

Table 8.3 Financial contributions for workplace training

Formula for calculating financial contributions for major residential development
X = A x B
X = Total financial contribution (£) A = Financial contribution of £715 per dwelling B = Number of dwellings
Formula for calculating financial contributions for major commercial development
X = A x B
C = Total financial contribution (£) A = Financial contribution of £715 per job generated by the development. B = Estimated number of jobs provided by the development The estimated number of jobs will be calculated on the basis of gross new employment floorspace provided by the development, taking into account the relevant land use(s) and applying the (former) HCA Employment Densities Guide (2nd Edition) or equivalent guidance agreed by the Council.
Formula for calculating financial contributions for the loss of industrial capacity
X = A x (B – C)
X = Total financial contribution (£) A = Financial of £715 per job lost as a result of the development. B = Estimated number of existing jobs C = Estimated number of jobs provided by the development The estimated number of jobs lost will be calculated on the basis of the net loss of existing employment floorspace resulting from the development, taking into account the relevant existing land use(s) and applying the (former) HCA Employment Densities Guide (2nd Edition) or equivalent guidance agreed by the Council.

Explanation

~~8.46.~~8.53. It is important that local residents are able to share in London's economic growth and prosperity. To achieve a more inclusive local economy, Lewisham residents must be well equipped to access jobs, advance career prospects and fulfil their aspirations. Everyone, regardless of their background or experience, should be able to develop their skills through lifelong learning and have good access to these opportunities.

8.54. High unemployment levels, lower ~~incomes~~ workplace earnings and deprivation persist in parts of the Borough because of certain barriers to employment that people experience~~,~~. ~~most notably the~~ This includes the lack ~~of~~ or mismatching of skills that are required in the jobs market, which is rapidly evolving in response to new technologies as well shifts in the predominant business sectors of the regional and national economy. There are particular local issues with respect to adult literacy and numeracy, for example, which present barriers to access in the labour market. These issues have been amplified by the Covid-19 pandemic. The Government's social distancing restrictions (including lockdowns) have adversely affected communities where a high proportion of the resident population was either furloughed or made redundant from the most affected sectors, and in places where entry level employment was traditionally already high. There is a growing body of research that indicates skills and training will be critical to supporting the economic recovery from Covid-19.[108]

~~8.47.~~8.55. ~~We will~~ The Council will promote a multi-stakeholder approach to help address the~~se~~ underlying causes of deprivation in a proactive way~~, including through the planning process~~. We will support the London Mayor in delivering the the Skills for Londoners Strategy, which focusses on post-16 skills and adult education. We will also work with regional and local partnerships including Lewisham Deal partners. The Lewisham Deal is based on a community wealth building approach. It aims to boost investment in local small and medium sized enterprises and to help provide high-quality training and employment opportunities for local residents. Key focus areas include procurement, apprenticeships, employment and training guidance, and the London Living Wage.

8.56. Applicants, developers and business owners are encouraged to recruit local labour, source local businesses and provide residents with opportunities for workplace training and skills development, such as apprenticeships. Consideration should be given to sourcing at all stages in the development process, and particularly in the construction and operational phases. This will not only benefit residents but the use of local labour and business can also support the Circular Economy and limit the environmental impact of new development, for

Commented [NE379]: Supporting text amended throughout to align with policy changes above

[108] For example, "Learning from employment and skills responses to Covid-19". Local Government Association (2021).

example, by helping to reduce the need for long distance commuting and the transport of materials.

~~8.48.~~8.57. Major developments provide greater scope for local jobs and training opportunities, and all such proposals will be expected to demonstrate how they will contribute to meeting the policy objectives. Major commercial and residential developments must make a financial contribution to workplace training using the formula set out in Table 8.3 (Financial contributions for workplace training). The requirements have been viability tested in the Lewisham Local Plan Viability Assessment (2022). Further details on financial and non-financial contributions towards workplace training will be set out in the Planning Obligations SPD.

~~8.49.~~8.58. In line with other Local Plan policies on industrial land management, ~~We will~~the Council will seek that development proposals ~~seek to prevent against the loss of all employment floorspace~~retain industrial capacity to ~~given~~ ensure the Borough's ~~forecast future requirements~~needs for workspace are met. ~~In exceptional circumstances where such~~ Development proposals resulting in the loss of industrial capacity~~can be appropriately justified, development will be expected to~~must make compensatory provision for employment lost. This will be secured through ~~planning~~ a financial contribution~~s~~, using the formula set out in Table 8.3 (Financial contributions for workplace training). ~~Some~~ The Council may apply this policy flexibly on a case-by-case basis~~flexibility may be applied in the case of~~, for example, with development proposals within Mixed-use Employment Locations~~,~~ where the consolidation of employment land is supported and managed through the plan-led process.

~~8.50. Further details on the nature and level of contributions sought are set out in the Council's Planning Obligations SPD (2015), or any equivalent document which may supersede it.~~

Commented [NE380]: Moved to paragraph 8.57 above

EC 1~~0~~1 Town centres at the heart of our communities

A. Town centres are and should remain at the heart of Lewisham's neighbourhoods and communities ~~and~~ as focal points for retail, commercial, cultural, leisure, community and civic activities. Town centres will be managed positively in order to ensure they are inclusive, diverse, attractive and vibrant places that are made more resilient and adaptable to future challenges and opportunities, ~~particularly~~ including those presented by new technology and changes in consumer behaviour, such as online shopping.

Commented [NE381]: Respond to consultation – request that community uses be identified as appropriate main town centre uses

B. Development proposals should support and help to secure t~~T~~he long-term vitality and viability of Lewisham's town centres ~~will be secured~~ by:
   a. ~~Focussing future growth and investment~~ Optimising the use of land within and around them~~, particularly to optimise the use of land and to strengthen connections to surrounding neighbourhoods~~;
   b. Maintaining and enhancing their distinctive features and characteristics where these make a positive contribution to the ~~locality~~neighbourhood, including their built form, environmental, historic and cultural character;

c. Ensuring they are inclusive, safe and healthy places ~~that are~~by creating environments that are barrier-free and accessible to all, with high quality buildings, spaces and public realm that are designed to:
   i. Reduce vehicular dominance and p~~P~~romote and enable movement by walking, cycling and the use of public transport~~, having regard to Policy TR3 (Healthy streets as part of healthy neighbourhoods)~~;
   ii. Encourage street level activity along with opportunities for social interaction and relaxation, including through provision of publicly accessible open space; and
   ~~ii.~~iii. Maximise opportunities to deliver new or enhanced green infrastructure, including by urban greening and river restoration;
d. Delivering an appropriate mix and balance of residential and main town centre uses in order to attract visitors and ensure people have good access to a competitive range of services and facilities, as well as to support businesses and grow the local economy through provision of a wide range of workspaces and premises; and
e. ~~Promoting~~ Ensuring town centres function as vibrant places of daytime, evening and night-time ~~economic, cultural and leisure~~ activities.

Commented [NE382]: These criteria have been moved from QD3 public realm, as they are most relevant to town centres

Commented [NE383]: Respond to consultation – more emphasis on urban greening in town centres

Commented [NE384]: Repetition – main town centre uses set out in A above

Explanation

~~8.51.~~8.59. Town centres are at the heart of Lewisham's neighbourhoods and communities. They all have distinctive features that reflect and help to reinforce the Borough's character and diversity. Town centres are also a key part of the local economy and important hubs of daytime, evening and night-time activity~~, and offer a variety of accessible retail, commercial, cultural, leisure and civic facilities~~. ~~The Local Plan seeks to ensure that town centres continue to have an important role in supporting our local communities, including by directing future growth and investment to and within them.~~ The delivery of the spatial strategy for the Borough is dependent on a well-functioning network of town centres. Development proposals must therefore demonstrate how they will support their long-term vitality and viability.

~~8.52.~~8.60. ~~On whole,~~ Lewisham has a well-functioning network of town centres ~~with retail and related service provision~~ that meet~~s~~ the daily needs of local residents, workers, students and other visitors. However some centres are performing better than others, ~~for example,~~ as evidenced by ~~vacancy rates~~our latest town centre 'health checks', which look at indicators such as vacancy rates, types of business and mix of uses.[109] ~~It is important~~The Local Plan seeks to prevent ~~against~~ the decline of ~~our~~the Borough's ~~H~~high ~~S~~streets and centres and makes clear the integral role they have in supporting Good Growth~~by encouraging the take-up of units and appropriately managing uses, along with implementing measures to improve their vitality and viability~~. It is important that town centres are lively, attractive and inclusive places that people can access safely and easily by walking, cycling and public transport. They should be places where people are

Commented [NE385]: Updated in line with latest technical evidence base

[109] Lewisham Retail Impact Assessment and Town Centre Trends Report (2021) and Lewisham Local Centres Topic Paper (2020).

able to live and encouraged to visit, with plenty of opportunities for leisure and relaxation throughout the daytime, evening and night-time. Development proposals must therefore respond positively to the character and environmental quality of town centres and secure the delivery of high quality buildings and public realm.

8.61. ~~Equally, t~~There is a need to ensure that town centres remain resilient and adaptable to the challenges and opportunities facing the ~~H~~high ~~S~~street. ~~. This is particularly in response to~~ including changes in consumer behaviour and ~~modern~~ business ~~activities~~practices~~, including multi-channel (online) shopping, which are creating new challenges~~. Brexit and Covid-19 have had significant short-term effects on the national, regional and local economies and are likely to have long-term implications, which require monitoring. This is particularly in terms of the retail sector where Covid-19 has led to a spike in town centre vacancies and accelerated trends in ~~Whilst~~ multi-channel (online) shopping.[110] ~~is affecting the retail sector, traditionally a stronghold of town centres, this has opened opportunities for the re-use of buildings. Complementary cultural, leisure and community uses are increasingly taking up space in town centres, helping to attract visitors. Furthermore, town centres are now becoming a focal point for higher density mixed-use development, including housing.~~ Whilst ~~protecting the retail function of~~ recognising that ~~the Borough's~~ town centres ~~is crucial~~ play a key role in the provision of local shops and services, ~~we will seek to ensure that~~it is important that ~~centres~~they are able to evolve and adapt over time, so that they continue to support ~~the~~ our neighbourhoods and communities ~~in which they are situated~~. The Local Plan provides support for a wide range of uses to locate within town centres as diversification is vital to their revitalisation, adaptability and long-term resilience.

Commented [NE386]: Respond to consultation – to reflect on impact of Covid and Brexit and implications for Local Plan

~~8.53. Lewisham's town centres have distinctive characteristics that are reflected in their built form, historic fabric and cultural character. Lewisham's Characterisation Study (2019) is helpful in articulating this. Where new development is proposed it is important that this contributes positively to the character of the townscape. Furthermore, development will be expected to deliver high quality urban environments that are safe and accessible to all, and which promote the health and well-being of the population. Centres experience a large number of visitors, including workers, and host a range of civic, cultural and leisure activities. A well-designed and appropriately managed public realm is therefore essential. It is also imperative that town centres remain lively and active places that are able to support a variety of uses, and where people have opportunities for leisure and relaxation throughout the daytime and evening.~~

Commented [NE387]: Repetition – covered elsewhere in supporting text and plan

EC1~~1~~2 Town centre network and hierarchy

A. ~~All new d~~Development proposals must support and reinforce Lewisham's town centre network and hierarchy. ~~Proposals will be required to~~They must demonstrate how the~~y~~ development will maintain and enhance town centre vitality and viability~~,~~

[110] Lewisham Retail Impact Assessment and Town Centre Trends Report (2021).

commensurate with the role and function of the centre, in accordance with Table 8.2, along with responding positively to its distinctive character.

B. A 'town centres first' approach will be used to assess d~~D~~evelopment proposals for main town centre uses, in line with the London Plan and the NPPF. The Sequential Test will be applied to ensure that main town centre uses ~~should be~~are directed to locations within town centres ~~within Lewisham's town centre hierarchy~~ or, if no suitable town centre sites are available or expected to become available within a reasonable period, to appropriate edge-of-centre locations.

C. The Sequential Test will not apply to Class F1 learning and non-residential institutions and Class F2 local community uses, however development proposals for these uses are encouraged to locate in town centres and other well-connected areas.

D. ~~The Council will seek to resist~~Development proposals for new main town centre uses in out-of-centre locations ~~retail uses, including retail parks~~ will be refused unless provision has been made for these uses within the Local Plan, including site allocations, or it is clearly demonstrated that no suitable town or edge-of-centre sites are available or expected to become available within a reasonable period. ~~It will investigate the role and function of existing out-of-centre retail parks and other sites in order to identify future opportunities to optimise the use of land to deliver the spatial strategy for the Borough.~~

E. Retail ~~I~~impact A~~a~~ssessments (RIAs) will be required ~~on~~to be submitted with development proposals for main town centre uses of 500 square metres gross floorspace or more at edge-of-centre and out-of-centre locations, unless provision for main town centre uses has been made in a site allocation. RIAs should be proportionate to the nature and scale of development. Development proposals will be refused unless an ~~Assessments must~~ RIA demonstrates that:

   a. There is an identified need and market demand for the amount and type of floorspace proposed; and
   b. The proposal, either by itself or in combination with other existing, committed or planned development, will not adversely impact on the vitality and viability of Lewisham's town centre network and hierarchy and its wider catchment.

~~B.~~F. Development proposals within town centres ~~They~~ should ~~also~~ contribute to the delivery of and support the appropriate distribution of ~~these~~ retail uses ~~in order~~ to ~~meet~~ help ensure the Borough's future need for ~~5,300 net~~8,400 additional gross square metres of retail floorspace ~~over the ten year period 2020-2030~~up to 2035 is met. Proposals for new major Use Class E(a) retail development should prioritise Lewisham and Catford ~~town~~ Major C~~c~~entres in the site selection process before considering other appropriate locations, including District Centres.

~~C.~~G. Development ~~of~~ within Lewisham town centre and its surrounds will be proactively managed in order to secure its future reclassification as a Metropolitan centre in the London Plan. ~~This includes supporting~~ Development proposals should direct new investment and ~~facilitating~~ facilitate the delivery of strategic infrastructure

Commented [NE388]: This policy has been moved from former Policy EC12, which has been deleted – see policy for further information.

Commented [NE389]: Respond to consultation – included to provide greater flexibility for community uses to locate within town centres

Commented [NE390]: Amended to ensure consistency with the NPPF and London Plan.

Commented [NE391]: Not required for the Regulation 19 plan

Commented [NE392]: This policy has been moved from former Policy EC12, which has been deleted – see policy for further information.

Commented [NE393]: New evidence - floorspace requirements updating pending in line with findings of the Retail Impact Assessment and Town Centre Trends Report.

Commented [NE394]: Respond to consultation – to make clear that it is the role of the London Plan to designate town centres at the higher order of the hierarchy

~~necessary~~ to ensure the centre can effectively serve a local and wider sub-regional catchment, with reference to Policy LCA2 (Lewisham Major Centre and surrounds).

~~D.A. The Council will seek to resist proposals for new out-of-centre retail uses, including retail parks, unless provision has been made for these uses within the Local Plan, including site allocations. It will investigate the role and function of existing out-of-centre retail parks and other sites in order to identify future opportunities to optimise the use of land to deliver the spatial strategy for the Borough.~~

Commented [NE395]: Repetition – this is addressed by the 'town centres first' policy above in criteria B

Commented [NE396]: Not required for Regulation 19 plan. A review of out-of-centre retail parks has now been undertaken to inform this local plan.

Figure 8.2: Centre hierarchy

Table 8.2 Lewisham's Town Centre Network and Hierarchy

Classification	Location	Role/function
Major town centre	Lewisham Catford	These are Lewisham largest and most well-connected centres with a high PTAL score meaning their catchment goes beyond Lewisham into neighbouring boroughs. They provide the highest proportion of comparison retail compared to convenience retail alongside hosting a range of uses such as offices, civic functions, culture, leisure, entertainment and services.
District town centre	Blackheath Deptford Downham Forest Hill Lee Green New Cross Gate ~~- Consolidated~~ Sydenham	Smaller than major centres and spread more evenly across Lewisham, these centres are well connected, serving several local communities. Typically they provide convenience retail with some comparison retail at a smaller scale alongside culture and leisure (e.g. café, restaurants and swimming baths), services (e.g. banks) and local office functions. Some centres, however, have developed specialist shopping functions such as independent boutique shopping for instance. At the same time, others are known for their role within the creative sector or having a lively night-time economy.
Local centre ~~(formerly neighbourhood local centre)~~	Bellingham ~~- New~~ Brockley Cross ~~Burnt Ash - New~~ Lee Station Crofton Park Downham Way Evelyn Street	Found within various areas of Lewisham with decent transport links, these smaller centres serve the surrounding neighbourhood and complement the larger major

Commented [NE397]: Factual update to rectify omission

	Staplehurst Road ~~– New~~ Hither Green Lane Honour Oak / Brockley Rise ~~– New~~ Grove Park Ladywell ~~– New~~ Lewisham Way New Cross Road ~~– New (changed from District)~~ ~~Upper Sydenham/~~Kirkdale ~~– New~~	and district centres. They consist of a small cluster of shops typically offering convenience retail (e.g. small supermarket up to around 500sqm) and services (e.g. Pharmacy and Hairdressers) together with a community anchor (e.g. Public House, Church or Cinema) attracting visitors.
Shopping parade	There are over 80 parades dispersed across the Borough	Scattered throughout Lewisham, they have been included for their role in complementing other centres higher up the hierarchy. Consisting mainly of smaller scale convenience retail (e.g. corner shops) they play a role in providing day-to-day access to some necessities within a short walking distance of residents nearby.

Figure: Major and District Centres with town centre boundaries and Primary Shopping Areas

Explanation

~~8.54.~~8.62. This policy establishes the Borough's town centre hierarchy and describes the main role and function of the centres within it. The London Plan classifies Metropolitan, Major and District town centres whereas Local Centres are designated by the Local Plan. Shopping parades and other neighbourhood service nodes, including corner shops, are included in the hierarchy given their complementary function but are not formally designated. The boundaries of the designated town centres within this hierarchy are shown on the Policies Map, along with the corresponding Primary Shopping Areas for Major and District Centres.

~~8.55.~~8.63. ~~All new d~~Development proposals ~~is expected to~~ must help to facilitate the delivery of the Borough's spatial strategy by supporting and reinforcing Lewisham's town centre network and hierarchy. ~~Proposals will need to reflect the~~The nature and mix of uses along with the design of development should be commensurate with the ~~main development principles for each of the~~ scale, role, function and character of a town centre~~s~~ with in the hierarchy. ~~This means having regard to~~Development proposals must demonstrate how they will support town centre vitality and viability by responding positively to the distinctive character and unique role of ~~each~~ a centre in supporting the neighbourhoods and communities within ~~their~~ its catchment, ~~both~~ which may cover areas both within and outside of the Borough.

Commented [NE398]: Respond to consultation – elevated to local centre following further review

Commented [NE399]: Policy supported text amended throughout to align with changes to policies above, which have been informed by the new London Plan (2021) and new evidence base, including Retail Impact Assessment and Town Centre Trends Report

~~8.56. Major centres typically contain over 50,000 square metres of retail and related town centre floorspace, offering a range of comparison and convenience goods along with complementary leisure and cultural functions. They have Borough-wide catchments and may draw trade from several Boroughs depending on their location. The Major centres of Lewisham and Catford are the highest order centres in Lewisham and will continue to perform a key strategic role as focal points for community activity.~~

Commented [NE400]: Repetition – the London Plan provides details on the nature, role and function of centres in the town centre hierarchy

~~8.57.~~8.64. Lewisham ~~town~~ Major C~~c~~entre is ~~a key focal point of~~ the Borough's ~~and is its~~ principal shopping and leisure destination ~~as well as~~and contains a~~n strategic~~ important public transport ~~hub~~node. ~~Whilst Lewisham is currently defined as a~~ The Major C~~c~~entre it is undergoing significant transformation and offers the potential to be reclassified as a Metropolitan centre in the future, as indicated by the ~~draft~~ London Plan. The town centre already benefits from excellent public transport links, and has been identified as a 'strategic interchange' in the London Mayor's T~~t~~ransport S~~s~~trategy.[111] ~~This new Local Plan will supersede the Lewisham Town Centre Local Plan (2014) in setting the strategic framework to deliver the vision for a Metropolitan centre.~~

8.65. Catford ~~town~~ Major C~~c~~entre is distinguished by its unique civic and cultural functions along with a distinctive local and historic character. ~~that t~~The Local Plan seeks to reinforce and build upon its strengths through targeted regeneration and renewal, ~~aided by~~including ~~investment in strategic~~new and improved transport infrastructure and public realm enhancements. The Council's ~~is preparing a masterplan for~~ Catford T~~t~~own C~~c~~entre Framework (2021) sets out a vision and strategy to make the town centre London's greenest, which has both informed and will help to support the delivery of the Local Plan.

8.66. Part 3 of the Local Plan includes additional policies for the Borough's Major, District and Local centres. It sets out how new development within these centres will be managed in order to facilitate the delivery of Good Growth and liveable neighbourhoods, consistent with the spatial strategy for the Borough. Site allocation policies have been included for strategic development sites within and at the edge of town centres.

8.67. This policy sets out the 'town centre first' approach for the location of ~~new retail, commercial, leisure and cultural uses (i.e.~~ main town centre uses as defined by the NPPF~~)~~. Such uses should be directed to the Borough's designated town centres or if necessary, appropriate edge-of-centre locations (unless provision for such uses have been made elsewhere by the Local Plan)~~.~~ Development proposals will be assessed in accordance with the S~~s~~equential ~~a~~pproach Test to site selection set out in ~~national planning policy~~the NPPF and London Plan.

8.68. Outside of designated centres, R~~r~~etail I~~i~~mpact A~~a~~ssessments will be required for proposals of 500 square meters gross floorspace or more, unless provision for retail uses has been made through a Local Plan site allocation. This local

[111] Mayor's Transport Strategy (2018). Greater London Authority.

threshold is more rigorous than that set by national policy and is informed by ~~Lewisham's Retail Capacity Study Update (2019)~~local evidence.[112] It provides wider scope for the consideration of proposals that could adversely impact on Lewisham's town centre hierarchy and compromise delivery of the spatial strategy.

Commented [NE401]: Supporting text moved from former Policy EC12, which has been deleted.

~~8.58.~~8.69. For the Sequential Test, f~~F~~lexibility will be applied to proposals for ~~commercial uses in the B1 Use~~ Class E(g) office uses, recognising that these uses will also be acceptable in designated employment areas, consistent with Policy EC~~3~~2 (~~Location and design of~~Protecting employment land and delivering new workspace).

Commented [NE402]: Amended to reflect appropriate uses in light of new Use Classes Order

8.70. With the levels of growth planned in the Borough up to 2040, it is important that neighbourhoods and local communities are appropriately supported with good provision of shops, services and community facilities. ~~Lewisham's Retail Capacity Study Update (2019) forecasts needs for retail floorspace within the Borough over the plan period, with need figures set out in five year intervals. It indicates that 5,300 net additional square metres of retail floorspace are needed over the ten year period 2020-2030 (comprising -500 sqm comparison and +5,800 convenience goods). It also suggests that some 14,500 net additional square metres of retail floorspace will be needed in the fifteen year period 2020-2035 (comprising 6,900 sqm comparison and 7,600 sqm convenience goods).[113]~~ The Lewisham Retail Impact Assessment and Town Centre Trends Report (2021) ('Town Centre Trends Report') includes an assessment of retail floorspace needs in the Borough. The study has taken into account information on the impacts of Brexit and Covid-19. It indicates that there is modest long-term scope for new retail development within Lewisham, over and above existing commitments (i.e. consented but undelivered developments). The report projects that an additional 8,397 gross square metres of floorspace will be required up to 2035.[114] This overall total comprises +10,641 square metres for convenience goods, -3,651 for comparison goods and +1,407 for food and beverage retail. The site allocations included in Part 3 of the Local Plan set parameters for specific sites in order to ensure that new development contributes to meeting these identified needs. They make provision for 'main town centre uses', which include retail uses, in order to respond to the flexibility provided by the new Use Class E (Commercial, business and service uses) in the Use Classes Order. Delivery against the retail floorspace target will be reviewed in the Authority Monitoring Report.

~~8.59.~~8.71. The Town Centre Trends Report recommends that, over the short-to-medium term, priority should be given to the re-occupation of vacant units to meet retail

[112] The Lewisham Retail Impact Assessment and Town Centre Trends Report (2021) concludes that the 2,500 square metre gross threshold set in national policy is inappropriate for Lewisham and that a lower threshold should be used.

~~[113] The Lewisham Retail Study Update (2019) suggests that figures beyond the 10-year period 2020-2030 should considered as indicative and reviewed throughout the plan period.~~

[114] The report recommends that this figure is used as a broad guide rather than a rigid target. The figure is included in Policy EC11 as a benchmark to support the plan-led approach to meeting objectively assessed needs for retail, consistent with the NPPF.

floorspace needs. Whilst the Local Plan broadly supports this approach it is also recognised that some vacant units may not be well-suited to modern businesses or retail occupiers, for example, owing to the size, configuration and quality of floorspace or ancillary facilities. There are also opportunities deliver new or re-purposed and higher quality retail units, along with other complementary uses, through the redevelopment of buildings and sites. The Local Plan therefore identifies specific locations within town centres where the comprehensive mixed-use redevelopment of sites will be supported.

~~8.60. The study also identifies that the majority of this floorspace can be accommodated in Lewisham and Catford Major Centres (recognising that significant new development of main town centre uses has been committed through consented schemes in Mixed-use Employment Locations). The Council will monitor progress towards the delivery of this requirement through the Authority Monitoring Report process.~~

~~8.61.~~8.72. The Town Centre Trends Report also suggests that the redevelopment of out-of-centre retail parks may assist in re-balancing floorspace provision across the Borough. The oversupply of retail floorspace in some areas may be redressed by rationalising out-of-centre retail parks which in turn can provide greater scope for new retail development in town centres. There are established out-of-centre retail parks ~~and facilities~~ in Lewisham~~,~~ including at Bell Green and Bromley Road. The Local Plan includes policies to facilitate the comprehensive redevelopment of these retail parks in order to support the vitality and viability of the Borough's town centres whilst delivering a wider range of beneficial uses at these sites, including new housing. ~~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 is not reliant on new out-of-centre development to meet future requirements.[115] Indeed, it forecasts a future reduction in the need for out-of-centre retail floorspace.~~ This approach is supported by the London Plan[116]. It directs that Local Plans should seek opportunities to redevelop out-of-centre retail parks in order to support the town centre hierarchy and make a more optimal use of land.

~~8.62. All new proposals for out-of-centre development will be assessed having regard to the NPPF and Policy EC 12 (Location of new town centre development). We will investigate the role and function of existing out-of-centre retail sites in order to identify future opportunities to optimise the use of land to deliver the spatial strategy. This includes opportunities that may arise through planned strategic infrastructure investment, particularly in respect of any future commitments to the Bakerloo line extension.~~

Commented [NE403]: Not required for Regulation 19 plan. A review of out-of-centre retail parks has now been undertaken to inform this local plan, as set out in Retail Impact Assessment and Town Centre Trends Report. Further details on scope for town centre are set out in Part 3 – Lewisham south area.

~~[115] The Retail Capacity Study Update (2019) acknowledges that a significant amount of new out-of-centre development at Mixed-use Employment Locations (such as Convoys Wharf and Surrey Canal Triangle) is in the pipeline, but has not yet been delivered.~~

[116] London Plan (2021), Policy SD7 (Town centres: Development principles and Development Plan Documents).

EC 12 Location of new town centre development

A. A 'town centres first' approach should be applied when considering the location of new retail, commercial, leisure and cultural uses (i.e. main town centre uses).

B. Within Major, District and Local Centres development proposals for new retail, commercial, leisure and cultural uses will be supported where they:

a. Are compatible with the scale, role, function and character of the centre and its catchment;

b. Sustain and enhance the vitality and viability of the centre; and

c. Respond positively to the delivery of the spatial strategy for the Borough.

C. Only where it is demonstrated that suitable sites are not available within designated centres, or within site allocations where provision for main town centre uses has been made, will the Council consider proposals for new retail, commercial, leisure and cultural uses at edge-of-centre locations, or if no suitable edge-of-centre sites are available, at out-of-centre locations.

Retail impact assessments will be required on proposals for main town centre uses of 500 square metres gross floorspace or more at edge-of-centre and out-of-centre locations, unless provision for main town centre uses has been made in a site allocation. Assessments must demonstrate that:

There is an identified need for the amount and type of floorspace proposed; and

The proposal, either by itself or in combination with other existing, committed or planned development, will not adversely impact on the vitality and viability of Lewisham's town centre network and hierarchy and its wider catchment.

Explanation

8.63. This policy sets out the 'town centre first' approach for the location of new retail, commercial, leisure and cultural uses (i.e. main town centre uses as defined by the NPPF). Such uses should be directed to the Borough's designated town centres, in accordance with the sequential approach to site selection set out in national planning policy. This means that existing centres should be the focus of the initial site selection exercise. Only where it is demonstrated that suitable town centre sites are not available will we consider proposals at accessible and well-connected edge-of-centre locations. Proposals should include a statement setting out how the development is compatible adjoining and neighbouring uses. Unless provided for by site allocations policies, out-of-centre development is at odds with the Borough's spatial strategy and is therefore strongly discouraged, however proposals will be considered where it can be shown through the sequential approach that there are no suitable sites available.

8.64.

8.65. Inappropriate edge-of-centre and out-of-centre developments, either individually or cumulatively, can compromise the integrity of the town centre hierarchy by competing with established centres and undermining their economic performance. We will therefore seek to ensure that all efforts have been made to direct new development to existing centres, particularly the Borough's Major centres for

Commented [NE404]: Repetition - policy removed to make the plan more concise. This policy deals with the 'sequential approach' to the location of main town centre uses, which is firmly established both by the NPPF and the London Plan. Parts of this policy are retained and brought into EC11 Town centre network and hierarchy; to refer to the sequential approach and a local threshold for triggering Retail Impact Assessments

~~larger format retail schemes. Applicants will be expected to give consideration to a range of site options and demonstrate flexibility with respect to the scale and format of development in order to overcome potential site constraints within town or edge of centre locations.~~

~~Outside of designated centres, retail impact assessments will be required for proposals of 500 square meters gross floorspace or more, unless provision for retail uses has been made through a Local Plan site allocation. This local threshold is more rigorous than that set by national policy and is informed by Lewisham's Retail Capacity Study Update (2019). It provides wider scope for the consideration of proposals that could adversely impact on Lewisham's town centre hierarchy and compromise delivery of the spatial strategy.~~

~~Flexibility will be applied to proposals for commercial uses in the B1 Use Class, recognising that these uses will also be acceptable in designated employment areas, consistent with Policy EC3 (Location and design of new workspace).~~

EC 13 Optimising the use of town centre land and floorspace

A. Development proposals should optimise the use of land and floorspace within town centres and at edge-of-centre locations by:
   a. Delivering new mixed-use schemes on individual sites and through comprehensive redevelopment of multiple sites, where appropriate;
   b. Investigating opportunities for the reuse and reconfiguration of existing space, or the provision of new additional space above or below ~~shops and~~ commercial ~~premises~~units; and
   c. Avoiding designs that comprise of single-storey development.

B. Within town centres and edge-of-centre locations, ~~proposals for new~~ mixed-use development proposals~~,~~ (including ~~development involving~~ the expansion, reuse or reconfiguration of existing ~~floorspace~~)~~,~~ will be considered having regard to:
   a. The role and function of the centre;
   b. Impact on town centre vitality and viability;
   c. Compatibility of the proposed use with adjoining and neighbouring uses, both in terms of land use and character; and
   d. Compliance with other policies.

C. Subject to (A) and (B) above, where a development proposal includes a residential use the development must:
   a. Not adversely impact on the function, appearance and character of the town centre, including its shopping and other frontages; and
   b. Provide adequate access arrangements for all of the building occupiers including separate secured access for the residential element.

D. Development proposals ~~involving~~ affecting an existing ~~retail and~~ commercial unit ~~s should~~ must ensure any ancillary floorspace that is integral to business operations and viability of ~~workspace~~ the unit ~~(such as space for storage and back-office functions)~~ is not compromised or lost.

Commented [NE405]: Policy amended to refer to edge-of-centre locations as these can be appropriate for main town centre uses, following the sequential approach set out in Policy EC12 Town centre network and hierarchy

Commented [NE406]: As above

Explanation

~~8.66.~~8.73. ~~It is important that Lewisham's town centres are managed positively in order to secure their long-term vitality and viability. This means making them more adaptable and resilient to change, as well as maximising the use of land within them. To support the continued commercial role of centres and facilitate their diversification, we will seek to optimise opportunities for additional sources of land and space to come forward through the planning process.~~ Town centres are key locations for supporting growth and regeneration in Lewisham and provide unique opportunities for new development to optimise the use of land. This includes backland and infill sites, underused or vacant upper storeys of existing town centre buildings and airspace above relatively low-density or single-storey commercial uses. These spaces can help to accommodate a range of uses to meet local needs including for workspace, community facilities and housing.

~~8.67.~~8.74. Development p~~P~~roposals for new single-storey development within and at the edge of town centres will be strongly resisted ~~given the imperative to make efficient~~as this form of development is not considered to make the optimal use of the Borough's limited land supply. This is ~~particularly in accessible~~because town centres are locations that are better suited to a wider mix of uses and where higher levels of density are normally appropriate. However it is recognised that for some uses a multi-storey format may not be deliverable owing to issues of compatibility of use(s), fit with local character, site constraints or development viability. Where single-storey buildings are proposed, applicants ~~will be expected to~~must provide a statement and supporting evidence to clearly justify ~~ing~~ why a multi-storey development is not appropriate or deliverable. Where Viability Assessments are submitted they must be independently appraised and verified by a Royal Institution of Chartered Surveyors (RICS) professional.

~~8.68.~~8.75. Mixed-use development may involve the intensification or reconfiguration of existing buildings and sites. ~~We have set~~Development and design parameters for strategic town centre sites are included in Part 3 ~~and the site allocation policies~~ of ~~this~~ the Local Plan~~, which will help to ensure future development is appropriate to its location and designed to a high quality standard~~. Elsewhere, proposals for ~~intensified~~ higher density mixed-use development will need to demonstrate that they ~~can be supported by good levels of public transport accessibility and~~ are compatible with the role and function of the centre within which they are located, ~~in addition to~~and comply~~ing~~ with other policies.

~~8.69.~~8.76. All development proposals, including changes of use, should ensure that ~~any~~ the amount and quality of ancillary floorspace within a commercial unit is retained or enhanced. This includes space for storage, back office functions and amenities, such as toilets and cleaning facilities. It is important that development does not compromise the continued business operation or long-term viability of existing commercial premises, whether through the reconfiguration of space or site redevelopment.

Commented [NE407]: Policy supporting text amended throughout to make more concise.

Commented [NE408]: Amended to ensure that Viability Assessments are independently appraised

~~8.70. This policy helps give effect to the NPPF and London Plan in seeking to facilitate sustainable development by locating housing within town centres. In addition to meeting local housing need, residential development in such highly accessible locations can help to strengthen town centre vitality and viability by generating footfall and street level activity. We will take a positive view on mixed-use residential schemes which make better use of underused or vacant sites and buildings, including spaces above relatively low density retail and commercial uses, provided they do not adversely impact on the function and character of the centre.~~

EC 14 Major and District Centres

A. ~~All new d~~Development proposals within and at the edge of a Major ~~and~~ or District centre~~s~~ must ~~support~~ demonstrate how they will support the vitality and viability of the town centre~~s~~ and make a positive contribution to ~~their~~ its local character, with reference to Policy EC11 (Town centres at the heart of our communities). ~~Development proposals will be required to submit a statement to demonstrate how the use is appropriate to its location and will provide for a beneficial mix of uses within the town centre.~~

Primary Shopping Areas

B. Primary Shopping Areas (PSAs) are the locations within Lewisham's Major and District centres where retail uses are and should be concentrated. Development p~~P~~roposals should support the retail function of the PSA. ~~for N~~new Class E(a) retail uses ~~retail development~~ are encouraged to locate in the ~~Primary Shopping Areas~~PSA in order to support and enhance town centre vitality and viability through the provision of a ~~these~~ complementary cluster~~s~~ of retail uses.

C. Development proposals for Class E and main town centre uses which do not contribute to the retail function of the PSA at the ground floor level must submit a Shopping Area Impact Statement. The statement must demonstrate that the development, whether individually or cumulatively with others, will support the retail function of the PSA and will not result in an unacceptable adverse impact on it by:

   a. Contributing to the vitality, viability, vibrancy and character of the PSA, including by ensuring that a range of consumer goods remain available within it, taking into account the role and function of the centre in the hierarchy;
   b. Providing an appropriate main town centre use at the ground floor level that will attract visitors and generate footfall within the PSA;
   c. Providing a positive frontage along with an active ground floor frontage in order to ensure that there is no excessively harmful break between retail uses and the continuity of the active frontage; and
   d. Ensuring local amenity is not unreasonably harmed by increased noise, odour, fumes and other nuisances.

~~B.~~D. In Lewisham ~~and Catford M~~major ~~town~~ centre~~s~~, development proposals should ~~ensure that Class A1 (retail) uses in~~support the role and function of the centre by contributing to the target for the ~~Primary Shopping Areas~~PSA ~~are~~ to maintain~~ed at~~ a minimum of 50 per cent of retail uses~~,~~ as a proportion of all units. ~~This will help to~~

Commented [NE409]: Repetition – this is covered by the spatial strategy and elsewhere in the plan

Commented [NE410]: The policy has been subject to significant revision throughout owing to 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

Respond to consultation - comments also reflected that the Local Plan needs to be amended to respond to these changes in legislation

Commented [NE411]: Amended to reflect appropriate uses in light of new Use Classes Order

~~ensure that a sufficient level of shopping provision is available as part of the wider town centre offer.~~ Development p~~P~~roposals that will result in the percentage of ~~A1~~ retail uses in the PSA falling below this threshold target will only be supported where the retail function of the PSA will not be adversely impacted, with reference to (C) above~~:~~.

~~a. It can be demonstrated that the premises have been vacant and actively marketed, for a minimum continuous period of one-year, and there is no reasonable prospect of the unit continuing in an A1 use;~~

~~b. The use is an appropriate main town centre use;~~

~~c. The use will significantly enhance, and not adversely impact on, the vitality and viability of the town centre, whether individually or cumulatively with other development;~~

~~d. The use will attract visitors to and generate activity within the town centre;~~

~~e. An active frontage is provided at the ground floor level; and~~

~~f. There will be no harmful break in the continuity of the remaining retail units, so to ensure the predominant retail function and character of the Primary Shopping Area is maintained.~~

~~C. In the District town centres of Blackheath, Deptford, Downham, Forest Hill, Lee Green and New Cross Gate development proposals for Class A1 (retail) uses should seek to locate in the Primary Shopping Area, and only where suitable sites are not available should proposals locate to sites elsewhere in the town centre. Within the Primary Shopping Area, proposals for main town centre uses which are not A1 uses will be supported where:~~

~~a. It can be demonstrated that the use will not adversely impact on the vitality and viability of the town centre, including by the overconcentration of non-retail uses;~~

~~b. The use will attract visitors to and generate activity within the town centre; and~~

~~c. An active frontage is provided at the ground floor level.~~

~~D. In Sydenham District Centre, development proposals will be considered against the requirements set out in (C) above.~~

E. Planning conditions may be used to secure Class E(a) uses that contribute to the retail function of the PSA. Where retail development is conditioned for that use, development proposals seeking a change to another appropriate main town centre use, including full flexibility for Class E commercial, business and service uses, must demonstrate that there is no reasonable prospect of the unit being used for continued retail use. This must be evidenced by a robust and recent marketing exercise covering a minimum continuous period of 6-months at a reasonable market value for rent or sale to the local area. Shopping Area Impact Statements must be submitted with applications for changes to a non-retail use where appropriate, with reference to (C) above.

The wider town centre area

Commented [NE412]: As above, the policy has been amended in response to changes in planning legislation. Where the Council can exercise control (i.e. when new development proposals come forward) the Local Plan 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.

E.F. Within the a Major ora and District town centre boundaries, and outside of Primary Shopping Areas, development proposals for main town centre uses will be supported where:

a. The use does will not result in a harmful overconcentration of similar uses, having regard to Policy EC17 (Concentration of uses); and

b. They provide a positive frontage including An an active ground floor frontage is provided at the ground floor level, or if it can be suitably demonstrated that this is not possible, a window display or other appropriate positive frontage at the ground floor; and

b.c. They comply with other Local Plan policies.

F.G. Development pProposals for residential units uses on the ground floor level or below, both within the Primary Shopping AreasPSA and the wider town centre area, are inappropriate and will be strongly resisted. This includes proposals for the conversion of units currently in a main town centre or complementary commercial, cultural or community use.

Explanation

8.71.8.77. This policy defines designates the Primary Shopping Areas within Lewisham's Major and District Centres, which are reflected shown on the Policies Map.[117] Primary Shopping AreasPSAs are characterised by their predominantly retail function role and character and remain a focal point for town centre activity, particularly as they tend to be in the most accessible parts of the centre. We willThe Local Plan seeks to ensure that the retail functional integrity of these areas is maintained and enhanced, so to support the long-term vitality and viability of the town centres.

8.78. The Local Plan provides flexibility for a wide range of commercial, leisure, community and cultural uses to locate within town centres. It is nonetheless important that a critical mass of retailing uses is are maintained within the Primary Shopping AreasPSAs to reinforce their retail role and character as well as to ensure people have access to a range of consumer goods. All Development proposals for Class A1 E(g) retail uses should seek toare strongly encouraged to locate within these areas. and oOnly when suitable sites are not available here within PSAs should other town centre locations be considered in the site selection process.

8.79. New planning legislation has resulted in updates to the Use Classes Order and the creation of a new Class E which brings together a range of commercial, business and service uses, including retail.[118] This provides additional flexibility for the commercial market by expanding the scope of Permitted Development

Commented [NE413]: The policy supporting text has been amended throughout to align with changes to the policies above

[117] Further information is set out in the accompanying Schedule of Changes to the Policies Map (2020). This shows the proposals to designate new Primary Shopping Areas and to remove existing designated Primary and Secondary Shopping Frontages in Major and District town centres.

[118] This includes changes to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and amendments to the Town and Country Planning (General Permitted Development) (England) Order 2015.

rights, meaning changes between Class E uses do not require planning permission. The Council recognises the benefits of the new Class E which can help landowners and leaseholders to quickly respond to market signals and keep business units in viable use. At the same time it is seeking to ensure the retail function of a PSA is not compromised to the extent that it adversely impacts on town centre vitality and viability, or the Council's ability to plan positively for identified needs for retail floorspace over the plan period.

~~8.72.~~8.80. Shopping Area Impact Statements are an important tool to assess the impact of a development proposal on the retail function of the PSA. They must be submitted with all applications for uses within the PSA that do not contribute to its retail function (i.e. uses which are not Class E(a) uses). The level of detail included within a statement should be commensurate with the nature and scale of the development proposed. When assessing impacts on the PSA consideration will be given to the existing mix of uses within the PSA to establish whether the development will significantly diminish the availability of retail uses and people's access to consumer goods. The Council's latest Authority Monitoring Report should be referred for information on the mix of uses in the PSA, however applicants may need to undertake surveys to ensure decisions are informed by up-to-date information. Where non-retail uses are introduced in the PSA they must be for appropriate main town centre uses, be designed with positive frontages and maintain a contiguous active ground floor frontage with adjoining units. This will help to attract visitors and generate footfall which in turn can support the viability of existing retail uses and the PSA more generally.

~~8.73.~~8.81. Lewisham Major Centre is the Borough's principal town centre and a key visitor destination. Local evidence[119] indicates that town centres in Lewisham's 'central area' make a significant contribution to the Borough's retail floorspace capacity and will play a role in future needs over the plan period. Lewisham Shopping Centre comprises a large part of the Major Centre's PSA and contains its main concentration of retail uses. To support the continued retail function of the PSA within the Major Centre, ~~A~~a target threshold approach will be used to help manage the mix and balance of uses within ~~it~~the ~~Major Centres of Catford and Lewisham~~, so that ~~Class A1 (~~retail~~)~~ uses form the majority of uses within the ~~Primary Shopping Areas~~PSA. ~~These centres are highest order centres in the Borough's town centre hierarchy. The Lewisham Retail Capacity Study (2017) and Update (2019) provides that they must continue to play a key role in accommodating the Borough's current and future needs for retail floorspace.~~ The 50% target threshold has been informed by our latest town centre surveys. It is considered a realistic and reasonable indicator for the point at which the ~~Primary Shopping Areas~~PSA can retain ~~their~~ its principal retail function and provide sufficient capacity to help meet Lewisham's future floorspace needs. Development p~~P~~roposals that ~~would~~ will result in the overall percentage of retail uses falling below this ~~minimum level~~threshold target will be resisted~~. H~~however, ~~some~~ flexibility ~~may~~ will be applied where it can be suitably demonstrated that the viability and vitality of the PSA will not be adversely affected ~~through evidence of~~

[119] Lewisham Retail Impact Assessment and Town Centre Trends Report (2021).

~~a vacancy and marketing exercise that the premises have no reasonable prospect of being retained in an A1 use, and other requirements are satisfied~~.

~~8.74. In the Borough's District Centres, proposals for Class A1 uses should seek to locate to the Primary Shopping Areas in the first instance. Main town centre uses for non-retail uses will only be supported where the use will make a demonstrable improvement to town centre vitality and viability, along with satisfying other tests. Unlike for Major Centres, a threshold approach will not be applied in the District Centres (except Sydenham) as these have evolved over time to perform distinct functions within their local area catchments. For example, in Blackheath, the centre is characterised by its café and restaurant culture and the catchment relies less heavily on its retail function. In Deptford, the centre's main retail element is the market, and shops along the high street play a more ancillary role. In short, there are variances in the role and nature of uses in the District Centres. A standard threshold approach is not considered appropriate given this situation, and in a few cases, the comparatively low baseline of A1 uses present in the Primary Shopping Area would make delivery of a high threshold challenging. However, we will continue to work with stakeholders and applicants to protect and improve local shopping provision, recognising that centres will continue to evolve in response to the population and household growth within their catchments.~~

~~8.75. A threshold approach will be applied in Sydenham District Centre, with the expectation that Class A1 uses will form the majority of uses in the Primary Shopping Area. Sydenham town centre is unique amongst the Borough's District Centres in that it has a very high level of shops, with a comparatively lower level of services. Our latest surveys show that Class A1 uses comprise roughly three-quarters of total units across the centre, and more than half of units in the Primary Shopping Area. This suggests that the centre is performing a key role in supporting this southern part of the Borough with shopping provision. We will continue to support this role, whilst providing flexibility for other complementary uses to come forward.~~

~~8.76. We will regularly monitor the percentage of uses in Major and District centres and report findings in the Authority Monitoring Report (AMR). Applicants will be required to refer this information as a starting point for considering the balance of uses, and may be required to provide their own assessment, for example, where several months have passed since the publication of the AMR. To determine the existing Primary Shopping Areas A1 percentage figure, the number of Use Class A1 units should be divided by the total number of units within the Primary Shopping Area.~~

~~8.77.~~8.82. Breaks in the continuity of shopping frontages threaten to diminish the ~~retail~~ function, character or appearance of town centres. ~~We will therefore seek to restrict the conglomeration of non-retail uses in Primary Shopping Areas. Where a~~ Development proposals must therefore be designed with positive frontages and maintain a contiguous active ground floor frontage with adjoining units, ~~would result in a~~avoiding harmful breaks of the ~~retail~~ frontage ~~(normally 3 or more adjoining non-retail uses)~~, also taking into account the prevailing character of the

streetscape and townscape. Active frontages should be associated with the use itself or where this is not possible or suitable, through a window display or other feature creating visual interest. This is necessary to ensure development ~~it must demonstrably improve~~supports town centre vitality and viability, such as by introducing a use that encourages linked trips or improves townscape and amenity by providing ~~more~~ active ~~shopfronts~~uses at the street level.

~~8.78. Complementary uses that attract visitors to the retail core, offering opportunities for meeting and relaxing, such as cafes and coffee shops, can enhance the vibrancy of town centres. Such uses will therefore be supported where they do not compromise the dominant retail function of the Primary Shopping Area, along with satisfying other requirements.~~

~~8.79.~~8.83. ~~Active frontages are vital to maintaining the vibrancy of town centres. All development must make a positive contribution to the townscape and interface well with street level activity. Where a new non-retail use is introduced within a town centre frontage it will be required to provide an active frontage, preferably associated with the use itself and where this is not suitable through a window display or other feature creating visual interest.~~

~~8.80.~~8.84. Within town centres development proposals for residential uses on ground floor or basement levels are not considered appropriate and will be resisted. This is owing to the detrimental impact ~~these uses~~the introduction of housing at the street level can have on the vitality and viability of the town centre, along with the character of the townscape. Impacts include the introduction of harmful breaks on the continuity of frontages and, where conversion is considered, the loss or compromising of existing space for commercial and related town centre uses.

EC 15 Local Centres

A. ~~All new d~~Development proposals within and at the edge of a Local Centre~~s~~ must demonstrate how they will support the vitality and viability of the centre~~s~~ and make a positive contribution to ~~their~~ its local character, with reference to Policy EC11 (Town centres at the heart of our communities). ~~Development proposals will be required to submit a statement to demonstrate how the use is appropriate to its location and will provide for a beneficial mix of uses within the centre~~.

B. ~~Class A1 (retail) uses, D~~Development proposals incorporating ~~with~~ small~~er~~ and moderately sized units for retail use~~,~~ are encouraged to locate in Local Centres. Where such provision already exists, this should be protected wherever possible in order to ensure a balanced mix of ~~shops and complementary services, community and cultural facilities~~main town centre uses.

C. Major development proposals within a Local Centre must make provision for a reasonable amount of small or moderately sized units suitable for micro, small and independent businesses. Where an end-user has been secured for immediate occupation on the development's completion and requires a larger unit or floor plate, this should be flexibly designed to enable sub-division into smaller units in the future.

Commented [NE414]: The policy has been subject to significant revision throughout owing to 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 local centres, such as retail

Respond to consultation - comments also reflected that the Local Plan needs to be amended to respond to these changes in legislation

Commented [NE415]: Respond to consultation – provision should be made to support small and independent businesses

~~B.~~D. Development proposals involving the ~~loss of Class A1 retail~~change of use~~s~~ from Class E to other main town centre uses within Local Centres will only be supported where it is demonstrated that:

~~a. It is demonstrated through a marketing exercise, of a minimum continuous period of six-months, that there is no reasonable prospect of retaining the unit in retail use;~~

~~b.~~a. The replacement use is an appropriate main town centre, community, cultural or employment generating use; and

~~c.~~b. An active frontage is provided at the ground floor level or ~~where~~ if it can be suitably demonstrated that this is not ~~suitable~~ possible a window display or other positive frontage.

~~C.~~E. Development p~~P~~roposals for the change of a main town centre use to a residential use at the ground floor level or below will ~~be strongly resisted, and~~ only ~~acceptable~~ be permitted where:

a. It is demonstrated through a robust and recent marketing exercise~~,~~ of a minimum continuous period of two-years~~,~~ at a reasonable local market value for rent or sale, that the unit has been vacant during this time and there is no reasonable prospect of retaining it in an appropriate main town centre, community or employment generating use; and

b. There ~~would~~ will be no adverse impact on local area character~~, including~~ and the continuity of the shopping frontage in the Local Centre.

~~D.~~F. Planning conditions may be used to secure Class E(a) uses that contribute to the retail function of the Local Centre. Where retail development is conditioned for that use, development proposals seeking a change to another appropriate main town centre use, including full flexibility for Class E commercial, business and service uses, must demonstrate that there is no reasonable prospect of the unit being used for continued retail use. This must be evidenced by a robust and recent marketing exercise covering a minimum continuous period of 6-months at a reasonable market value for rent or sale to the local area.

Explanation

~~8.81.~~8.85. Local Centres complement Lewisham's larger Major and District Centres. They play an important role in providing a range of shops and services that meet the day-to-day needs of residents and others within the Borough. They also feature at least one community facility that provides a focal point for community activity and helps to attract visitors. Local centres ~~are particularly important for less mobile members of the community,~~ support sustainable neighbourhoods by enabling people to walk or cycle to access goods, services and facilities. They can be particularly beneficial to those with reduced mobility, including ~~the elderly and~~ older people ~~with mobility issues~~, who may be not be able to visit larger town centres on a regular basis.

~~8.82. We have reviewed the Borough's existing network of Local Centres and shopping parades, taking into account the number of units and mix of uses within them, their local function and the need for provision to support the levels of growth anticipated over the plan period. This research suggests that there is scope to consolidate and increase the number of centres, as reflected in Table 8.2 (Town~~

Commented [NE416]: The policy supporting text has been amended throughout to align with changes to the policies above

Commented [NE417]: Included to appropriately reflect the criteria used to inform the designation of Local Centres, as set out in the Council's Local Centres Topic Paper 2020

~~centre network and hierarchy) and the Policies Map. A number of new Local Centres have been designated by elevating their status from shopping parades. This is because they exhibit a critical mass of business units with a mix of town centre uses, host a key community facility as an 'anchor' attracting visitors and are relatively accessible to the local catchment.~~[120]

8.86. Development proposals for retail uses consisting of smaller and moderately sized units and floor-plates are encouraged to locate in ~~District~~ Local Centres. Where such ~~shopping~~ provision already exists, this should be protected wherever possible in order to ensure ~~that centres accommodate~~ a balanced mix of main town centre uses and to support the role and function of the centre. ~~We will seek to prevent against the loss of retail units in these locations, whilst providing a measure of flexibility to take account of viability, and to allow centres to adapt in response to local demand. Where proposals involve the change of use away from a Class A1 retail use, they should provide sufficient evidence to demonstrate that suitable alternative provision is easily accessible nearby. This is particularly in respect of more essential day-to-day services, such as grocery shops and chemists.~~ However it is recognised that the new Class E category provides greater flexibility for changes from retail to other commercial, business and service uses. Where planning permission is required, development proposals for the change of use from Class E must be for appropriate main town centre or employment generating uses.

8.87. Local Centres are smaller in scale than Major and District Centres and therefore provide unique opportunities for accommodating micro, small and independent businesses. Major development proposals must, and all other developments should seek to, integrate a reasonable amount of small units or space suitable for these types of businesses. This can include dedicated units or flexibly specified space that can be easily sub-divided. What constitutes a reasonable amount will be considered on a case-by-case basis.

~~8.83.~~8.88. In order to support the role and function of Local Centres the Council may use planning conditions to secure retail uses where new development comes forward. Local Centres vary in terms of their size and catchment, provision of shops and services, and local character. The need for or loss of retail uses will therefore affect centres differently, for example, losses may be felt more acutely in smaller centres. The Council will therefore consider the need for conditions on a case-by-case basis. Where retail uses have been conditioned and a change of use is sought, applicants must demonstrate that reasonable efforts have been made to retain the unit in retail use in the first instance.

~~8.84.~~8.89. Positive street frontages and a~~A~~ctive ground floor frontages are vital to ~~maintaining~~ the vibrancy and character of Local Centres. ~~All d~~Development proposals must make a positive contribution to the townscape and ~~interface well~~create a coherent relationship with the street ~~level activity~~. ~~Where a new non-~~

Commented [NE418]: Not required for the Regulation 19 plan

Commented [NE419]: Additional supporting text for new policy criterion C above

~~120 Further information is set out in the accompanying Schedule of Changes to the Policies Map (2020), as well as the Local Centres Topic Paper (2020).~~

~~retail use is introduced within a frontage it will be required to~~Development proposals, including changes of use, must maintain the continuity of frontages in the centre and not result in a harmful fragmentation of the frontage, whether individually or cumulatively with other developments. Development proposals must provide an active ground floor frontage, preferably associated with the use itself and where this is not ~~suitable~~ possible through a window display or other feature creating visual interest.

~~-~~Development proposals for the conversion of a main town centre use~~s~~ at the ground floor level or below to a residential use will be strongly resisted. This is in order to protect the function of Local Centres and the character of their townscape. Only where it can be suitably demonstrated through a~~n active~~ robust and recent marketing exercise that there is no continued demand for the existing or an appropriate ~~alternative~~ main town centre use will such proposals be considered. Viability will then be considered in combination with impact on the continuity of frontages and local character. Development that results in a ~~'~~harmful break in the frontage~~'~~ will not be supported. This will be considered on a case by case basis, but generally refers to the introduction of a use that detracts from the continuity of a publicly accessible and active frontage, and is incoherent with the prevailing streetscape and townscape.

8.90.

EC 16 Shopping parades, corner shops and other service points

Commented [NE420]: The policy has been subject to significant revision throughout owing to 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 shopping parades, such as retail

Respond to consultation - comments also reflected that the Local Plan needs to be amended to respond to these changes in legislation

A. ~~Class A1 (R~~retail~~)~~ uses located at shopping parades, corner shops and other service points (i.e. outside of ~~Town Centres~~Major, District and Local Centres) provide important day-to-day provision of consumer goods within ~~for~~ Lewisham's neighbourhoods and should be protected wherever possible.

~~A.~~B. Development proposals involving the ~~loss of Class A1 retail~~ change of use from Class E to other main town centre or appropriate employment generating uses at ~~these locations~~shopping parades, corner shops and other service points will only be supported where it is demonstrated that:

- ~~a. It is demonstrated through an active marketing exercise, of a minimum continuous period of six months, that there is no reasonable prospect of retaining the unit in Class A1 retail use;~~
- ~~b.~~a. Similar alternative provision is available within the local area ~~a~~ which can be reached safely, easily and conveniently by ~~comfortable~~ walking ~~distance~~, normally within 400-800 metres; and
  ~~The replacement use is an appropriate main town centre, community or employment generating use; and~~
- ~~c.~~b. An active frontage is provided at the ground floor level, or ~~where~~ if it can be suitably demonstrated this is not ~~suitable~~ possible a window display or other positive frontage.

~~B.~~C. ~~Outside of Town Centres and Local Centres,~~ At shopping parades, corner shops and other service points development proposals for the change of a main town centre use to a residential use at the ground floor level or below will ~~be resisted, and~~ only ~~acceptable~~ be permitted where:

a. It is demonstrated through ~~an active~~ a robust and recent marketing exercise~~,~~ of a minimum continuous period of one-year at a reasonable local market value for rent or sale, that the unit has been vacant during this time and there is no reasonable prospect of retaining the unit in an appropriate main town centre, community or employment generating use; and

b. There ~~would~~ will be no adverse impact on local area character~~, including~~ and the continuity of the frontages within the shopping parade or other frontages.

D. Where a development proposal involving a main town centre use is located outside of a Major, District or Local Centre and satisfies the Sequential Test, the Council may use planning conditions to secure an element of Class E(g) retail uses. This in order to ensure provision of essential daily consumer goods in the area where there is an identified need.

Explanation

Commented [NE421]: The policy supporting text has been amended throughout to align with changes to the policies above

~~8.85.~~8.91. There are a number of shops and services located outside of the designated town and local centres. ~~. These~~ which are dispersed across the Borough in shopping parades, at corner shops and other locations. These ~~shops support Lewisham's neighbourhoods and communities by offering easily accessible goods and services and~~ help cater to the essential day-to-day needs of residents, workers and visitors~~, including those with mobility issues~~. These ~~shops~~ types of uses are distinguished from ~~units in~~those located in out-of-centre retail parks and large format retail warehouses, ~~such as at Bell Green Retail Park,~~ which are dealt with elsewhere in the Local Plan.

~~8.86.~~8.92. ~~Given the context of growth within the Borough and future demand for retail provision, we will seek to ensure that~~It is important that people in the Borough have easy access to essential day-to-day consumer goods. Development proposals should therefore seek to retain shops outside of centres ~~are retained~~ wherever possible. However it is recognised that the new Class E category provides greater flexibility for changes from retail to other commercial, business and service uses. Where planning permission is required, development p~~P~~roposals ~~involving~~ for the change of use from Class E to other appropriate main town centre or employment generating uses will only be ~~considered~~ permitted where it is demonstrated ~~through a continuous marketing exercise, covering a minimum period of six-months, that the existing or alternative retail use is not viable. Marketing must reflect a realistic and competitive price appropriate to the local area, with preference given to the use of agents with local or specialist expertise. Furthermore, changes of use will only be appropriate where it can be shown~~ that there is similar alternative provision available locally, normally within 5 to 10 minutes walking distance (roughly 400-800 metres). In terms of alternative provision, some flexibility may be applied where the use in question provides a bespoke offer which is not necessarily an essential good or service, such as a wine merchant or chocolatier. ~~Where these requirements are satisfied, we will support~~ Development proposals for alternative employment generating or community uses that are compatible with the local area will be supported in order to secure the viability of existing units and buildings.

~~8.87.~~8.93. Out-of-centre shops and facilities are facing significant pressure for change of use, particularly to housing, given the improving residential land values in the Borough. However the introduction of residential uses within shopping parades and other local service destinations can compromise their functional integrity, viability and townscape value. We will therefore seek to ensure that all reasonable efforts have been made to actively market units for other employment generating or community uses, before giving consideration to residential uses. In this instance, marketing should cover a minimum continuous period of one-year at a reasonable local market rate for rent or sale.

8.94. All changes of use must maintain the continuity of frontages in the shopping parade or other frontages ~~in the locality~~. ~~We will resist~~Development proposals ~~that~~ must not result in a harmful fragmentation of shopping frontages, either individually or by ~~virtue of~~ their cumulative impact. Additionally, development proposals ~~will not be supported where they fail to~~must make a positive contribution to local character, consistent with other Local Plan policies. Ground floor residential development, in particular, has the potential to interrupt the established rhythm of the streetscape and townscape in ~~neighbourhood~~ shopping parades.

~~8.88.~~8.95. In order to ensure that people in Lewisham have easy access to essential day-to-day consumer goods, the Council may use planning conditions to secure new retail uses for development located in in areas where there is an identified need for this provision. Local need will be assessed on a case-by-case basis having regard to the availability of retail uses within 400 to 800 metres radius of the proposed development site, which is roughly equivalent to 5 to 10 minutes walking distance. Development proposals are strongly encouraged to consider the need for provision of essential goods, particularly in areas which do not benefit from good levels of public transport access.

EC 17 Concentration of uses

A. ~~All development should contribute to the delivery of inclusive and mixed neighbourhoods and communities, including by supporting the vitality and viability of the Borough's town centres.~~ Development p~~P~~roposals ~~will be resisted where they~~must not result in a harmful overconcentration of ~~night-time activities, hot food takeaways, betting shops and associated uses, and financial and professional services (including payday loan shops and other similar uses).~~the following Sui Generis uses:
   a. Hot food takeaways;
   b. Betting offices, casinos and bingo halls;
   c. Payday loan shops
   d. Pawnbrokers;
   e. Nightclubs and dance halls; and
   f. Drinking establishments.

Commented [NE422]: Repetition – this is set out elsewhere in the plan.

Commented [NE423]: Amended for clarity and to aid policy implementation – makes clear the specific uses to which policy applies

B. The harmful overconcentration of uses will be assessed ~~having regard to~~on the basis of the number of ~~units~~ similar uses within a 400 metre radius of ~~a proposed~~the development ~~site.~~ and where:

a. The vitality and viability of the town centre will be adversely impacted, taking into account the function of the centre in the hierarchy; and

b. The character of the area has changed or local amenity has been adversely impacted as a result of:

i. Increased noise, odour, fumes and other nuisances;

ii. Traffic generation including from taxis, private hire and servicing vehicles;

iii. Inadequate provision of waste management and recycling facilities;

iv. Anti-social behaviour and public safety.

Commented [NE424]: Amended for clarity and to aid policy implementation – sets the criteria against which a harmful overconcentration will be assessed

~~A.~~C. ~~Applications~~ Development proposals for uses listed in (A) must ~~be accompanied by~~submit sufficient information to allow for an assessment of the concentration ~~and potential impacts arising from the use~~of uses, in line with the criteria in (B) above.

Hot food takeaways

~~B.~~D. In addition to complying with (A) and (B) above, development p~~P~~roposals for hot food takeaways ~~(Use Class A5)~~ will only be ~~supported~~ permitted where ~~it is demonstrated that~~:

Commented [NE425]: Amended to ensure 'policy tests' for assessing concentration of uses in B above also apply to takeaways

~~a. They will not result in a harmful overconcentration of uses, having regard to (A) and (B) above;~~

~~b.~~a. They are located at least 400 metres away from the boundary of an existing or proposed primary or secondary school; and

~~c.~~b. The proportion of hot food takeaway~~s~~ premises in the shopping frontage complies with the thresholds set out in Table 8.3.

Commented [NE426]: Amended to ensure schools which have been consented but not yet built are considered in planning decisions

Food and drink services

~~C.~~E. ~~All d~~Development proposals for uses involving the service of food and drink must make adequate arrangements to protect ~~the~~ and manage local amenity ~~of adjoining and neighbouring properties~~, in line with Policy QD~~9~~ (Amenity and agent of change).

~~D.~~F. Where development proposals for uses involving the service of food and drink are acceptable in principle, a condition will be sought requiring the operator to achieve and operate in compliance with the Healthier Catering Commitment Standard.

Table 8.3 Shopping frontage threshold for takeaways

Location	Threshold applied
Primary or secondary School	400m away from school boundary
Major / District Centre	Proportion of ~~A5 uses~~premises does not exceed 5% of units
Local Centre	Proportion of ~~A5 uses~~ premises does not exceed 10% of units
Shopping Parade (20 units or more)	Maximum of 2 ~~units in A5 use~~premises
Shopping Parade (19 units or less)	Maximum of 1 ~~unit in A5 use~~premise

Explanation

~~8.89. Lewisham, like other inner London Boroughs, features areas that are densely developed and where a wide range of uses are located in close proximity to each other. As the Borough continues to grow and develop in the future, it is important that its communities can benefit from an appropriate mix and balance of uses. The Local Plan seeks to carefully manage the location of uses recognising that excessive concentrations of particular uses can have harmful impacts, including on the liveability of residential areas, the vitality of town centres and the well-being of the local population.~~

~~8.90.~~8.96. Town centres are at the heart of Lewisham's neighbourhoods and communities. Their vitality and viability relies heavily on the presence of a mix of uses and activities. It is important that ~~D~~development proposals ~~that are likely to~~do not result in a harmful concentration ~~or saturation of similar uses in a locality, including within town centres, will be resisted~~ of uses. This is especially for certain Sui Generis Uses, whose proliferation can also adversely impact on local character, amenity, public health and safety. ~~This is particularly in respect of night-time economic activities (including nightclubs and bars), hot food takeaways, betting shops and associated facilities (such as adult gaming centres), and some financial and professional services (particularly payday loan shops and pawnbrokers). However, proposals for all uses will be considered on their individual merits.~~

~~8.91.~~8.97. In assessing whether development p~~P~~roposals will ~~be assessed having regard to the nature and scale of development, servicing requirements, operating hours, security and community safety, transport and other amenity impacts, along with compatibility with local character~~ lead to a harmful overconcentration of uses, we will use the policy criteria above. ~~We will consider if a proposal is likely to result in a negative impact on the surrounding area, whether on its own or cumulatively in combination with other similar uses~~. A 400 metre radius, ~~,~~ established as a straight line distance from the proposed development site, is considered an appropriate range from which to assess impacts. This measure is generally accepted as 5 ~~-~~minutes walking distance and provides a useful benchmark against which other similar provision could be easily accessed in the locality. ~~We will have~~Development proposals must have particular regard to ~~the Borough's more~~areas experiencing significant deprivation[121] ~~deprived areas~~, where the impacts of some uses may be more pronounced.

~~8.92. Town centres are now accommodating a wider range of services and facilities that complement their traditional retail function. This extended offer includes food and drink establishments. These uses can play an important role in supporting town centre vitality and viability, such as by generating activity and providing opportunities for extended visits and linked trips. Food and drink establishments~~

[121] For policy implementation this should be taken as an indicative benchmark of the 20 per cent most deprived areas, in accordance with the Government's latest Indices of Multiple Deprivation (IMD).

Commented [NE427]: Policy supporting text amended throughout to make more concise and to reflect changes to criterion B above.

Commented [NE428]: Amended for clarity and to aid policy implementation

~~can also promote well-being, with provision of space for people to relax and socialise during the daytime and night-time. For these reasons we are broadly supportive of food and drink establishments. However we will seek to guard against excessive concentrations or clusters of uses where these threaten to undermine the liveability of local communities and the vitality of town centres.~~

~~8.93.~~8.98. Hot food takeaways are now recognised as an ongoing concern with respect to the wider systems approach to health and well-being. This policy helps give effect to the ~~draft~~ London Plan Policy E9 (Retail, markets and hot food takeaways), which encourages Boroughs to manage the concentration of such ~~A5~~ Sui Generis uses, both around schools and within town centres.

~~8.94.~~8.99. Food and drink establishments regularly attract a high number of visitors and by virtue of their operation may give rise to environmental and amenity issues. Development p~~P~~roposals ~~will be expected to~~must make adequate arrangements for operational requirements whilst ensuring protection of amenity. This includes consideration of litter, commercial waste disposal, fumes, noise, traffic and parking. Planning conditions may be used to ensure there are no adverse impacts on local area amenity.

~~8.95.~~8.100. The Healthier Catering Commitment is a scheme that helps food businesses in London to provide healthier food to their customers. Hot food takeaways are often associated with unhealthy food, however it is accepted that other uses supporting the food and beverage industry also make provision for items that are high in calories, fat, salt and sugar and which could adversely impact on health outcomes. This includes ~~A1 and A3~~ Class E business uses such as cafes, restaurants and coffee shops. To make it easier to access healthy food options in Lewisham, we will seek that operators achieve compliance with the Healthier Catering Commitment Scheme.

Commented [NE429]: Amended to reflect appropriate uses in light of new Use Classes Order

Figure 8.3 – Strategic areas of night-time activity and Cultural Quarters

EC 18 Culture, creative industries and the night-time economy

Cultural and creative industries

A. The cultural and creative industries (including education and training facilities that support and are associated with these industries) contribute to the diversity and distinctiveness of Lewisham's neighbourhoods and play an important role in the local economy. Development proposals should ~~help facilitate~~support the continued growth and development of these industries by:
   a. Protecting existing cultural venues and uses, including by ~~having regard to policy QD7 (Amenity and~~applying the A~~a~~gent of C~~c~~hange~~)~~ principle;
   b. Making provision for new cultural venues, workspace and performance space in town centres and other appropriate locations, particularly in major development proposals and large-scale regeneration schemes;
   c. Designing public realm with spaces that can be adapted to support civic and cultural events, including outdoors~~, in line with Policy QD3 (Public realm and connecting places)~~;

d. Considering the use of vacant properties and land for temporary pop-up or meanwhile uses for cultural and creative activities, having regard to Policy ~~EC~~ ~~22~~DM5 (Meanwhile uses); and

e. ~~Facilitating~~Enabling the provision of high quality, fast and reliable digital infrastructure, in line with Policy TR7 (Digital ~~and communications infrastructure and~~ connectivity).

B. Development proposals involving the loss of cultural venues that have heritage, economic, social or cultural value should be avoided. They will only be permitted where:

a. The loss of the venue will not result in a significant adverse impact on the role and function of a Cultural Quarter or town centre;

b. There is authoritative marketing evidence which demonstrates that there is no reasonable prospect of the building or space being used for a similar or alternative cultural use, covering a minimum continuous period of two-years. This must include evidence of efforts made to market the venue to the local community, relevant cultural organisations and business groups;

c. The use is not a meanwhile use; and

d. Where the proposal involves the demolition or loss of a building it complies with other Local Plan policies including on heritage assets and the historic environment.

C. Where a cultural venue is a public house, or comprises space within a public house, development proposals involving the loss of a venue will be assessed in accordance with Policy EC18 (Public houses).

D. The Lewisham North Creative Enterprise Zone (CEZ) is designated in the Local Plan. Development proposals ~~will be expected to~~should support and~~, where appropriate,~~ contribute to enhancing the cultural and creative industries within the CEZ, in line with Policy LNA3 (Lewisham North Creative Enterprise Zone).

Commented [NE430]: This has been moved from Policy EC1 A thriving and inclusive local economy

Cultural quarters

~~A.~~E. Lewisham benefits from the presence of Cultural Quarters comprising local clusters of complementary cultural, community and commercial activities. The following Cultural Quarters are designated in the Local Plan:

a. Deptford Creekside;
b. New Cross; and
c. Forest Hill.

~~B.~~F. ~~Proposals for c~~Cultural, community and commercial uses ~~within Cultural Quarters~~ will be encouraged and supported within Cultural Quarters, having regard to other Local Plan policies. Development proposals should ~~seek to~~ retain or make appropriate re-provision to accommodate existing cultural, community and commercial uses where these make a positive contribution to ~~the area~~a Cultural Quarter. Development proposals that ~~would~~ will adversely impact on the distinctive character and function of ~~the~~ a Cultural Quarter, including through the loss of viable cultural venues, will be ~~strongly resisted~~refused.

~~C.~~G. Temporary activities and meanwhile uses (such as festivals, markets, exhibitions, performances and other cultural events) will be supported within Cultural Quarters, with reference to Policy DM5 (Meanwhile Uses) ~~where these will not have an adverse impact on local amenity, public safety and the highway network or compromise the function of employment locations~~.

Evening and n~~N~~ight-time economy

~~D.~~H. Evening and n~~N~~ight-time economic activities should make a positive contribution to the neighbourhoods within which they are located by:

a. Supporting the local economy through provision of a wide range of employment generating uses and jobs along with opportunities to carry out business beyond normal daytime hours;
b. Enhancing the vitality and viability of town centres and other employment areas; and
c. Reinforcing local character and identity, and creating more inclusive communities, through provision of a locally distinctive and expanded leisure, cultural and entertainment offer.~~; and~~
~~d. Protecting and improving local amenity.~~

~~E.~~I. Development p~~P~~roposals for evening and night-time economic activities should be directed to appropriate town centre locations, giving priority to the following designated areas of night-time activity:

a. Areas with more than local significance:
    i. Major centres of Catford and Lewisham;
    ii. District centres of Blackheath, Deptford, and New Cross Gate;
    iii. Local centre of New Cross Road;
b. Areas with local significance:
    iv. District centres of Deptford and Forest Hill.

~~F.~~J. Development p~~P~~roposals for evening and night-time economic activities located outside of town centres will only be supported where ~~it can be shown that~~ the use(s) will complement and not ~~undermine existing venues in~~adversely impact on the town centre ~~locations~~network and hierarchy.

~~G.~~K. ~~All~~ Development proposals for evening and night-time economic activities must demonstrate that they:

a. Will ~~not result in an unacceptable impact on the~~protect, manage and not result in an unreasonable adverse impact on local amenity ~~of properties in the immediate and surrounding area~~;
b. Will ~~support town centre vitality and viability by ensuring an appropriate balance of uses, and will~~ not result in a harmful overconcentration of uses.~~, in line with other Local Plan policies~~ with reference to Policy EC17 (Concentration of uses);
c. Are located in well-connected places ~~of good public transport accessibility~~ with easy to reach Night Service transport options; and
d. Can be safely accessed during all hours of operation.

Commented [NE431]: Repetition – this is covered in criterion F above and elsewhere in the plan

Explanation

Cultural and creative industries

8.101. Placeholder - supporting text to be included (covering strategic approach and protection / loss of cultural venues)

Cultural Quarters

~~8.96.~~8.102. Lewisham benefits from the presence of its distinctive Cultural Quarters. These are local concentrations of complementary cultural, community and commercial activities and feature a key community anchor, such as an education or cultural institution. ~~The~~ Cultural Quarters reflect the unique character and diversity of the Borough, along with performing important economic, cultural and social functions. The~~is~~ is policy ~~designation of the Cultural Quarters helps to formalise and~~seeks to ~~build on the existing~~ reinforce and enhance the character and mix of uses within these locations. ~~They reflect the presence of a mix of complementary uses, along with a key community anchor, such as an education or cultural institution. Further detailed~~Additional policies for Cultural Quarters are set out in ~~the character area section in~~ Part 3 of the Local Plan.

~~8.97. We will seek to promote Cultural Quarters as an integral component of Lewisham's local economy and cultural offer. Development proposals for community, cultural and complementary commercial uses will be supported within these locations, having regard to other Local Plan policies. Cultural Quarters include Locally Significant Industrial Sites and it is vital that the functional integrity of the LSIS is secured and not compromised. Temporary activities and uses such as festivals, markets, exhibitions, performances and other cultural events will be supported within Cultural Quarters where they do not impact on local amenity.~~

Commented [NE432]: Removed to make more concise – these points are covered elsewhere in the policy and plan

Evening and n~~N~~ight-time economy

~~8.98.~~8.103. The night-time economy refers to economic activity taking place between the hours of 6pm and 6am. Night-time economic activities cover a broad range of uses but typically concern leisure, cultural and entertainment venues associated with the Use Class ~~A~~ E ~~(retail)~~ (Commercial, business and service) and ~~D2 (assembly and leisure) Use Classes, along with some~~ Sui Generis uses (such as night clubs, drinking establishments, public houses, cinemas, theatres and performance venues). The London Plan considers the night-time economy a strategic priority and seeks to promote the Capital as a 24-hour global city in order to maximise opportunities for economic and cultural development. Lewisham is well placed to play a key role in this regard, with vibrant and diverse ~~communities~~ neighbourhoods and town centres that can both anchor and benefit from night-time activities.

~~8.99.~~8.104. The ~~draft~~ London Plan identifies several categories of night-time economy clusters across the Capital. ~~It recognises that~~ Lewisham ~~is host~~

~~to~~contains several Major and District Centres that exert “more than local significance” in this function, including Lewisham, Catford, Blackheath~~,~~ and New Cross. The Local Plan also designates ~~We also recognise the important role of the~~ Deptford and Forest Hill District Centres as areas with “local significance”. ~~in contributing to community vitality through their cultural and leisure offer. Accordingly, Deptford and Forest Hill District Centres will also be considered an appropriate location for night-time economic activities.~~ For the most part these centres are located in Lewisham’s Creative Enterprise Zone where night-time ~~economic~~ activities will help to support and strengthen the Borough’s economy and cultural ~~capital~~offer.

~~8.100.~~8.105. Consistent with other Local Plan policies that support the town centre hierarchy, night-time activities should be directed to the above noted strategically important locations. Proposals in other town centres will be considered having regard to the nature and scale of the development in relation to role and function of the centre. Whilst we are broadly supportive of appropriately located night-time activities, we will seek to ensure that proposals do not result in excessive concentrations of uses that adversely impact on town centre~~s~~ viability and local amenity.

~~8.101.~~8.106. Development p~~P~~roposals for night-time economic activities at out-of-centre locations ~~are generally discouraged~~should be avoided. ~~They should only be taken forward~~ They should only be considered when it is demonstrated through the S~~s~~equential A~~a~~pproach that no suitable town centre sites are available, or the use would be more appropriately located in a designated employment area. This will help to avoid situations where out-of-centre clusters of activity develop cumulatively over time as these ~~threaten to~~can undermine the viability and vitality of town centres~~, as well as the viability of the established economic and cultural facilities within them~~. ~~However, we will allow some~~This policy provides flexibility for ~~consideration of~~ out-of-centre locations recognising these may be preferable in certain circumstances, such as where there are site constraints or to better manage particular impacts on local amenity. ~~In these circumstances, we may use~~ T~~t~~emporary consents may be used ~~so that we can~~in order to monitor and review impacts over time.

~~8.102.~~8.107. ~~Irrespective of site location all development for~~ Development proposals for night-time economic activities~~y~~ must ~~benefit from good public transport accessibility~~be located in well-connected areas. This includes options for night-time public transport such as the Night Bus or Overground Night Service – the ~~strategic~~ designated night-time clusters are already serviced this way. Development p~~P~~roposals ~~are also encouraged to~~should incorporate public realm ~~treatments~~enhancements, including ~~appropriate~~ external lighting, wherever possible in order to create a more attractive and legible environment. These measures will help to ensure that all visitors and workers can easily and safely access venues and facilities.

EC 19 Public houses

A. Public houses are unique and integral features of Lewisham's neighbourhoods and cultural identity, and perform important community, social and economic functions locally. There will be a presumption in favour of the retention of public houses in Lewisham. Development proposals involving the loss of a public house that has heritage, economic, social or cultural value to the community, including through change of use or redevelopment, will be refused unless there is robust and authoritative evidence to demonstrate that:
    a. Legitimate efforts have been made to preserve the facility as a public house, including through evidence of regular maintenance and upkeep, good management and through business diversification;
    b. The public house is not financially viable and there is no reasonable prospect of the premises remaining in this use, or an alternative community use, in the foreseeable future as evidenced through attempts at different business models and management, and an active marketing exercise of a minimum continuous period of three-years; and
    c. All feasible options for the re-provision of the public house have been fully investigated, and where these are not considered deliverable sufficient justification is provided.

B. Development proposals affecting a public house, including its operational and ancillary amenity space, will be refused unless there is robust and authoritative evidence to demonstrate that the viability of the pub, and its current and future operation, will not be compromised and development will not detract from the character and appearance of the building, including any features of historic or cultural significance.

C. Development proposals involving the replacement or re-provision of a public house must ensure the replacement facility is of ~~comparable character and quality as the existing public house~~a high quality design and responds positively to local character, taking into account the need to preserve or enhance the significance of heritage assets and their setting. ~~and has~~ The development proposal must provide an appropriate amount and configuration of floorspace to enable the continued viability of the public house, and should not result in a net reduction of floorspace unless this can be sufficiently justified. This includes dedicated performance space or amenity space that has been or can reasonably be used for cultural or community uses.

D. Where the change of use of a public house is considered acceptable by the Council, development proposals ~~will be expected to~~must retain the building and other associated features where these makes a positive contribution to local character, including by their historic, streetscape and townscape value.

~~D.~~E. Development proposals for new public houses will be supported where they contribute to liveable neighbourhoods by improving people's access to these community facilities and comply with other Local Plan policies.

Explanation

Commented [NE433]: Respond to consultation – the 'comparable character' requirement introduces ambiguity around what a replacement facility should provide, and introduces issues for implementation. Also, officers note that existing facilities may not necessarily make a positive contribution to local character and could be improved, but the 'comparable' wording would set a low benchmark for replacement facilities. The policy is amended to make clear the focus is on high quality design, compliance with other policies on local character and heritage, and long term viability of the use.

Commented [NE434]: Respond to consultation – stronger requirements to ensure important cultural/community space is retained

Commented [NE435]: Respond to consultation – in principle support for new pubs provided to support areas which are poorly served by these facilities

~~8.103.~~8.108. Public houses, or pubs, are a unique and integral feature of the British cultural identity of Lewisham. They are fundamentally community facilities that promote social cohesion, offering a welcoming environment for people of all backgrounds to socialise and interact. Many local pubs are heritage assets in their own right, or have played a part in the Borough's cultural and historical development. This may be reflected in their built form or through a pub's association with people or events that have shaped the Borough's history. Pubs often have longstanding ties to their neighbourhoods and strong affiliations with local communities and community groups, and therefore contribute to people's sense of place and belonging.

~~8.104.~~8.109. There are many different community functions that pubs can perform. For example, pubs often include amenity space which is used as venues for functions, performance space, and informal meeting space for residents and community groups. Pubs also support the local economy and are particularly vital to the visitor, evening and night-time economy. Lewisham, like many other London Boroughs, has experienced a decline in public houses over time. Recognising the important social and economic role they play, we will seek to guard against the loss of these community and cultural facilities. Particular consideration will be given to the need to protect purpose built, historic pubs (built in the 20th Century or earlier), especially where these are landmark features in the townscape or sited at prominent positions, within town and local centres or elsewhere in the Borough.

~~8.105.~~8.110. Development proposals involving the demolition or loss of an existing public house, including through change of use, must submit evidence to demonstrate that the pub is not financially viable and there is no reasonable prospect of the premises remaining in this use, or an alternative community use. ~~We will expect to see~~Applications must provide full details of patronage levels and trading accounts over the past 3 years, including accounts from previous management where appropriate. In addition, ~~applicants~~ applications must provide a statement documenting the steps taken by the owner or operator to respond to viability concerns, including falling patronage levels and profit margins. This might cover considerations given to business diversification (for example, expanding the food and beverage offer), promotions or building refurbishment. Finally, proposals will need to provide proof of a marketing exercise covering a minimum continuous period of three-years, including details of commercial agents, advertisements and lease terms offered. During this time the pub must be actively marketing at a reasonable local market rent. We will consider whether any ties or restrictive covenants have affected interest. Development p~~P~~roposals will be ~~resisted~~ refused where there is good reason to believe that the viability of the pub has been compromised by deliberate neglect or mismanagement.

~~8.106.~~8.111. Public houses require dedicated operational spaces. They also often feature function rooms or ancillary amenity space, including outdoor gardens, which are critical to supporting their role as community facilities and places of gathering. Where development proposals involve a reduction or reconfiguration of such operational and ancillary spaces, it must be demonstrated that this will not

have a detrimental impact on the financial viability of the public house. Furthermore, proposals must show that the remaining residual space will be of a sufficient amount and quality to continue to meet the needs of pub users. Operational and ancillary spaces include, but are not limited to, beer gardens, function rooms, kitchens, cellars and accommodation integrated into the building.

~~8.107.~~8.112. Where sites are proposed to be redeveloped, including through comprehensive redevelopment, our priority is to protect pubs particularly where they are of historic, cultural or community interest. However, in certain circumstances it may be acceptable that a facility is replaced or re-provided. Development p~~P~~roposals will be required to demonstrate that they have considered all reasonable options for retaining the pub in situ. Where this is not possible, the replacement provision must be designed to a sufficient quality and standard to ensure the continued viability of the pub. This aim of this policy is to ensure there is a genuine intention to retain the facility in viable use, so to prevent against future changes to alternative uses.

~~8.108.~~8.113. National planning policy recognises the value of public houses as community facilities. We will therefore seek to protect against their loss, having regard also to Policy CI 1 (Safeguarding and securing community infrastructure). Where the loss of a pub is proposed, development proposals must suitably demonstrate that there is similar alternative provision elsewhere in the local area. If there is sufficient evidence to support that the loss is acceptable in principle, proposals ~~will be expected to~~must retain the building and any ancillary land or other features, where these makes a positive contribution to local character.

~~8.109.~~8.114. Development proposals involving the loss of public houses listed as Assets of Community Value will be assessed against this and other relevant Local Plan policies.

~~8.110.~~8.115. To support the implementation of this policy~~, we have~~ the Local Plan set~~s~~ out marketing requirements for development proposals affecting public houses ~~in an~~ (Appendix 5) ~~to the Local Plan,~~ which all proposals will be ~~required to comply with~~assessed against, as appropriate.

EC 20 Markets

A. Development proposals ~~should~~ must protect and seek to enhance existing markets and market spaces. ~~.~~New markets or market spaces will be encouraged and supported where they complement ~~and support~~ Lewisham's town centre network and hierarchy, ~~along with the~~and will make a positive contribution to the ~~cultural~~ culture and vibrancy of the Borough.

Commented [NE436]: Respond to consultation – to aid policy implementation, clarification as to what constitutes market space

B. Development p~~P~~roposals for new markets or market space should be directed to appropriate town centre locations. Where new ~~such provision is~~market space is proposed ~~on sites~~ outside of centres, and where the Local Plan has not made provision for main town centre uses there (for example, through site allocation policies), proposals will only be supported where it is demonstrated ~~that there are no~~

~~suitable town centre sites available, with preference given to edge-of-centre locations~~through the sequential approach~~, and~~ that they:

a. ~~Do~~ Will not adversely impact on the vitality and viability of the town centre network and hierarchy;
b. Make beneficial use of vacant or underused sites;
c. Are located in well-connected areas ~~of~~ with good ~~P~~public ~~T~~transport ~~A~~access Levels~~ibility and can be accessed safely by visitors~~;
d. Can be appropriately accommodated on streets or other areas of the public realm, where appropriate; and
e. Are temporary in nature.

C. Development p~~P~~roposals that are likely to ~~for new development~~ affect~~ing~~ existing markets within town centres will be considered having regard to:

a. The priority given to retaining markets as part of the town centre offer and ensuring appropriate re-provision of market space, where there is a demonstrable demand; and
b. The impact on town centre vitality and viability with particular consideration given to:
    i. Provision of a range of premises and floorspace to support small and start-up businesses;
    ii. Local character, including distinctive character of the market; and
    iii. Public realm and townscape.

D. ~~All~~ Development proposals for markets and market space must demonstrate that there will not be an unreasonable adverse impact on ~~the~~ local amenity ~~of adjoining and neighbouring properties~~, ~~or~~ and not have a detrimental ~~effect~~ impact on public health and safety and the ~~functioning of the local road network~~public realm.

Explanation

~~8.111.~~8.116. Lewisham is well served by local markets (including street markets, specialist and farmers' markets) that complement and support the vitality and viability of the Borough's town centres. These markets play a vital economic role by extending consumer choice and access to a wide range of goods and services as well as supporting employment, including through provision of local jobs and operating space for start-up, small and independent businesses. Markets also have an important social and cultural function. They serve as hubs for community activity and help to reinforce local identity and character. Some of Lewisham's markets, such as Douglas Way market in Deptford, have strong historical connections and are renowned for their unique offer, attracting visitors both from the local area and further afield.

8.117. For the purpose of this policy markets are defined as land and/or space that is authorised or licenced for market use, taking into account market space secured on temporary basis (i.e. as a meanwhile use). Markets may also include public realm that has been designed to accommodate market space but which is not currently authorised or licenced for this use. For example, outdoor public realm in town centres designed with connection-ready infrastructure, such as power

Commented [NE437]: Amended to make more concise – the sequential approach is set out in Policy EC12 Town centre network and hierarchy

Commented [NE438]: Respond to consultation – to aid policy implementation, clarification as to what constitutes market space

outlets and water supply. The presence of a market or market space will be established on a case-by-case basis with reference to planning, licencing and Business Rate records.

~~8.112.~~8.118. Development p~~P~~roposals for new markets and market space will be expected to apply the 'town centre first' principle of site selection. Markets should complement and support the vitality and viability of the Borough's town centre network and not compete with existing centres for trade. However it is recognised that site availability and other constraints may prohibit additional provision from coming forward in town centres. Further, there may be vacant or underutilised sites (such as those with planning consent but where development has not yet commenced) which offer interim opportunities for optimising the use of land in the Borough. We will therefore give consideration to out-of-centre proposals where it can be demonstrated the town centre hierarchy will not be compromised. Applications should detail how the goods and services provided will not undermine the offer in existing centres. ~~Proposals in areas of low public transport accessibility are discouraged~~. Markets should not normally be located in poorly connected areas. Given the high levels of footfall markets attract it is important that visitors can easily and safely access them during their operating hours. Temporary consents or planning conditions ~~will~~ may be used in order to ensure flexibility for assessment of impacts over time.

~~8.113.~~8.119. Where new development concerns or may impact on existing markets, proposals must demonstrate ~~consideration to the~~how they will safeguard~~ing of~~ market space including appropriate re-provision~~, having regard to any identified demand~~. Where market space is to be reconfigured or reduced proposals will be expected to show that sufficient provision will remain to meet local needs for employment floorspace, particularly for small and start-up businesses. Development offers the opportunity to improve the functional and aesthetic quality of town centres and the market spaces within them. All proposals should seek to maintain and enhance the unique features of the market and its associated public realm where these make a positive contribution to local character. This is particularly important given the historical and cultural value of many of Lewisham's markets.

~~8.114.~~8.120. ~~All~~ Development proposals must make adequate arrangements to avoid or mitigate unreasonable impacts on ~~the~~ local amenity. ~~of adjoining and neighbouring occupiers, and wider local area.~~ This includes consideration of congestion on footpaths and the road network, refuse storage and collection, noise and odour. Proposals for street markets must demonstrate that there will be no detrimental effect on the functioning of the road network.

EC 21 Visitor accommodation

A. ~~Local provision of visitor accommodation can help to meet the growing demand across London.~~ Development proposals for ~~new~~ serviced visitor accommodation ~~will be supported where they are~~must be appropriately located at sites within or at the edge of town centres, or other sites that are well-connected ~~locations where there are good levels of~~ by public transport ~~accessibility~~.

Commented [NE439]: This policy has been amended throughout to better distinguish between serviced visitor accommodation and temporary sleeping accommodation (i.e. holiday lets, Air BnB, etc.), which are considered differently in policy terms

B. Development proposals for ~~new~~ serviced visitor accommodation should ensure a range of high quality provision in the Borough catered to the varying needs of visitors. Proposals will only be supported where they:

~~a. Do not result in the net loss of existing housing;~~

~~b.~~a. Are proportionate to their location in terms of size, scale and function;

~~c.~~b. Do not result in a harmful overconcentration of ~~similar uses~~serviced visitor accommodation in the ~~locality~~area;

~~d.~~c. Comply with the relevant ~~Provide a level of car parking that is appropriate to the site's public transport accessibility level, whilst seeking to minimise car~~ London Plan parking standards ~~wherever possible~~;

~~e.~~d. Ensure adequate access, drop-~~off~~/-pick-up and servicing arrangements ~~appropriate to the size and location of the accommodation~~;

~~f. Maximise linkages and opportunities for walking, cycling and use of public transport;~~

~~g.~~e. ~~Demonstrate high quality and accessible design standards,~~ Are of a high quality design, ensure ~~with an adequate standard of~~ adequate space and amenity for occupants and provide ~~provision of~~sufficient choice for people who require an accessible bedroom ~~accommodation, in line with draft London Plan requirements~~;

~~h.~~f. Make appropriate arrangements for long-term adaptability and sustainability; and

~~i.~~g. Demonstrate that an agreement is in place to secure an operator prior to the commencement of the development.

C. Development p~~P~~roposals for serviced visitor accommodation must ~~should contribute to local area vitality by providing~~be designed with positive frontages, including active ground floor frontages. ~~and incorporating~~ Where the development incorporates ancillary uses and facilities ~~that are accessible~~ these should be made available for public use, where appropriate, and access not unreasonably restricted.

~~C.~~D. Development proposals for visitor accommodation must not result in the net loss of housing, including through the conversion or change of use of dwelling units.

E. ~~The Council will seek to resist the use of visitor accommodation for permanent occupation. Proposals for serviced apartments will be expected to demonstrate appropriate management arrangements for their use as short-term accommodation (up to 90 days).~~The use of a residential property for 'temporary sleeping accommodation' (short-term let or holiday let) must not exceed 90 nights within a calendar year.

~~D.~~F. Development proposals for the conversion or change of use of serviced visitor accommodation to housing must demonstrate that the relevant Local Plan policies for housing will be satisfied including on design quality, space standards and provision of affordable housing.

Explanation

Commented [NE440]: This point has been retained but moved to criterion D below – criterion B deals with design and management rather than land use

Commented [NE441]: Amended to make more concise – policy principles retained

Commented [NE442]: Moved from B above

Commented [NE443]: Amended to better reflect the relevant legislation

Commented [NE444]: Additional point to reinforce requirements around high quality housing

~~8.115.~~8.121. The visitor economy is an integral part of the local and wider regional economy. It provides residents with job opportunities, supports local businesses and helps to ensure the viability of cultural and leisure facilities. Lewisham boasts an array of leisure, cultural and historic attractions. The Borough is also within easy travelling distance of ~~central~~ London's Central Activities Zone, making it a convenient base for visitors to explore the Capital. The ~~draft~~ London Plan estimates that an additional 58,000 bedrooms of serviced accommodation will be needed in London by 2041~~,~~ and Lewisham has a role to play in meeting this demand.

~~8.116.~~8.122. For the purpose of this policy, serviced visitor accommodation pertains to uses within the C1 Use Class including hotels, bed and breakfasts, traveller / youth hostels, short-term holiday lets and serviced self-catering apartments.

~~8.117.~~8.123. ~~It is important that visitor accommodation contributes to sustainable communities. The location of visitor accommodation is important, particularly given the strategic objective to minimise reliance on car borne transport. We will encourage that new~~ Serviced visitor accommodation is defined by the NPPF as a main town centre use. It should therefore be located ~~where there is good public transport accessibility. This includes~~ within ~~town and~~ or at the edge of town centres.[122] These locations~~, which~~ are well~~-~~suited to supporting visitors with a range of ~~complementary~~ facilities and services, and generally benefit from good public transport links. Development p~~P~~roposals ~~for visitor accommodation~~ outside of town centres will need to be sufficiently justified, having regard to the sequential approach for main town centre uses~~, for example, with evidence demonstrating a lack of availability of suitable sites~~.

Commented [NE445]: Amended for consistency with the NPPF and the London Plan

~~8.118.~~8.124. Development proposals for v~~V~~isitor accommodation ~~, like all new development,~~ must ~~positively~~ contribute positively to the local area, including its character ~~and setting of its site~~. The nature and scale of the ~~accommodation~~ development should be proportionate to its surroundings~~, recognising the various typologies of visitor accommodation within the C1 use class~~. For instance, a large format hotel may be more appropriate at a prominent town centre location or ~~at a key~~ transport interchange, whereas a smaller scale boutique hotel or serviced apartment may be more sensitively integrated elsewhere in the Borough.

~~8.119.~~8.125. ~~All visitor accommodation should be designed to a high quality standard. Proposals will be expected to respond positively to the local context, taking into account the distinctive features of the built, historic and natural environments. Particular attention should be given to the quality of materials.~~ Development proposals must ensure adequately sized amenity spaces and bedrooms, including sufficient provision for accessible bedrooms with reference to London Plan Policy E10 (Visitor Infrastructure). ~~We will expect that n~~New

[122] This is in line with the Sequential Approach to the location of main town centres uses established by the NPPF and London Plan (2021) Policy SD7 Town centres: development principles and Development Plan Documents.

development ~~is~~ should be capable ~~to~~ of achieving~~e~~ accreditation by the National Quality Assurance Scheme.

8.126. Development proposals ~~will be expected to~~must be designed with positive frontages. They should also maximise opportunities to ~~deliver~~integrate active ground floor frontages and appropriate ancillary uses, particularly ~~in~~to support town centre ~~locations~~vitality and viability~~. This is important to ensure the visitor accommodation enhances and does not detract from local area vitality~~. Ancillary uses may include ~~receptions,~~ cafés and restaurants, conference facilities, salons, fitness studios and other ~~space~~uses. ~~that can be~~Access to facilities should not be unreasonably restricted and made available for use by the ~~local community~~wider public ~~as well as visitors using the accommodation~~.

~~8.120.~~8.127. Development p~~P~~roposals ~~will also need to~~must demonstrate that the visitor accommodation is both sustainable and ~~deliverable~~feasible. Through the Green Tourism for London programme, hotels and other serviced accommodation should seek to reduce carbon dioxide emissions, water use and waste generation. ~~Speculative development will not be acceptable as the bespoke nature and requirements of hotel operators may result in the construction of visitor accommodation that does not serve their intended purpose and runs the risk of dereliction. Proposals for visitor accommodation will need to~~Applications must demonstrate that an operator will be identified and secured prior to the commencement of the development. This is necessary to guard against speculative hotel development for which there is no clearly established business demand, and which might preclude the use of land for more beneficial ~~public~~ uses that support the delivery of the spatial strategy.

~~8.121.1.1. Development will be expected to maximise opportunities to deliver active ground floor frontages and appropriate ancillary uses, particularly in town centre locations. This is important to ensure the visitor accommodation enhances and does not detract from local area vitality. Ancillary uses may include receptions, cafés and restaurants, conference facilities, salons, fitness studios and other space that can be made available for use by the local community as well as visitors using the accommodation.~~

~~8.122.~~8.128. Lewisham has significant housing needs and development proposals involving the net loss of housing will therefore be refused. In recent years the visitor economy has been bolstered by the growth in short-term serviced accommodation, often offering a more unique and affordable alternative to ~~conventional hotel rooms~~serviced accommodation. It is important that ~~conventional~~ the Borough's housing supply is not compromised by unlawful use of residential premises for visitor accommodation. ~~Therefore,~~ The Deregulation Act 2015 includes provisions on the use of residential properties for temporary sleeping accommodation (i.e. serviced lets or holiday lets). ~~proposals for serviced apartments will be required to provide details of a management plan, so to ensure rooms will not be occupied for periods of 90 days or more. The Council will expect that the use is secured in the form of a licence and not a lease.~~ Operating an

Commented [NE446]: Amended for consistency with the London Plan

Commented [NE447]: Amended to make more concise – the matter of speculative development continues to be addressed in retained text

Commented [NE448]: This has been moved up in the supporting text to paragraph 1.22

entire residential property for short-term rental for more than 90 nights in London without planning permission is an unauthorised change of use.

Commented [NE449]: Amended to refer relevant legislation on temporary sleeping accommodation and to make clear Council's position on loss of housing through unauthorised uses

EC 22 Meanwhile uses

A. Proposals for the meanwhile (temporary) use of vacant sites or units in town centres and designated employment areas will only be supported where the site or unit:

a. Is being actively marketed; or

b.a. Falls within the boundary of a site allocation that is not expected to come forward for comprehensive redevelopment in the short term; or

c.a. Is located on land within a consented major development scheme, which is being delivered in phases; and

d.a. The meanwhile use sought:

i. Is appropriate to its location, with priority given to suitable employment generating, community or cultural uses;

ii.i. Will not adversely impact on the amenity of adjoining and neighbouring occupiers, in line with the Agent of Change principle (Policy QD 9);

iii.i. Does not preclude the permanent use of the site for appropriate commercial or main town centre uses, or prohibit delivery of the site allocation; and

iv.i. Will be temporary in nature.

B.A. Proposals for the meanwhile (temporary) use of vacant land and buildings outside of town centres and designated employment areas will be considered on a case by case basis, having regard to their contribution to supporting the Borough's spatial strategy and compliance with other Local Plan policies.

Explanation

8.123.1.1. Vacant premises and sites can have a detrimental impact on the vitality and viability of places. This is especially in town centre locations where vacant units can visually detract from local character and result in lower levels of footfall. The Local Plan seeks to optimise the use of land in the Borough including by ensuring that land and buildings do not go unnecessarily unused. We will therefore give consideration to meanwhile (temporary) uses of vacant units or sites, particularly where they support beneficial uses that might not otherwise have site opportunities available. This includes uses that support business development, community activities and those that help to address acute specialist, local housing needs.

8.124.1.1. Where meanwhile uses are proposed, applicants must submit evidence to demonstrate that the vacant unit or site is being actively marketed, including during the period of meanwhile activity, at market rates that are reasonable to the local economic area. The intention here is to ensure that sites or units are taken up for their intended use whilst recognising some flexibility is needed to respond to fluctuations in the market or other factors. If we consider that a site or unit has

been made deliberately vacant in order to secure a temporary consent, the application will be refused.

8.125.1.1. The Local Plan includes a number of strategic site allocations, some of which are expected to come forward over the medium to long-term. Our priority is to ensure that development is delivered as quickly as possible. However, there are circumstances where site allocations may take longer to be realised, such as when development is phased or time is needed to allow for coordination between different landowners. In the interim period we are keen to ensure that active uses are maintained wherever appropriate. Place Ladywell is a successful example of a temporary use in the Lewisham town centre area, where an innovative modular mixed-use scheme was consented for a fixed period. This meanwhile use provided local provision of specialist accommodation and workspace, and has now been re-located to enable comprehensive redevelopment in line with the site allocation. The scheme has been recognised with several planning and design awards.

8.126.1.1. All proposals for meanwhile uses must not preclude the future permanent occupation of the site or unit for an appropriate main town centre, commercial or other use. Further, in line with other Local Plan policies, we will expect that meanwhile uses do not have an adverse impact on the amenity of neighbouring properties. Where located in town centres or employment areas, meanwhile uses must not compromise the employment generating function of nearby sites in line with the Agent of Change principle.

8.127.1.1. To encourage meanwhile uses, the Council may consider the future use of Local Development Orders (LDO) allowing temporary uses in specific locations subject to certain conditions being satisfied.

8.128.1.1. Where meanwhile uses are approved they will be considered for monitoring purposes. This includes meanwhile residential uses, where conventional units and non-conventional bedrooms will be counted towards the Borough's housing target. This approach is consistent with that advocated in the draft London Plan.

Commented [NE450]: This policy has been moved to Part 4 of the Local Plan which deals with Delivery and monitoring.

9 Community infrastructure

What you've told us

Community facilities are important to health and wellbeing and should be protected.

Highly valued facilities include:

- Libraries
- Youth centres
- Leisure and recreation centres and clubs

Community facilities should be open to everyone. Where they are not free to use, they should be affordable to local residents.

Some concerns about:

- The poor condition and possible closure of older community facilities
- Whether there will be enough community facilities (such as surgeries and schools) to meet extra demand as the borough grows

What we've learned

Early education and school places

- There is good provision of childcare and early education places
- Expected demand for primary and secondary school places can be met with existing facilities now, but a new secondary school is likely needed in the long-term
- About 30% of secondary school students living in Lewisham attend schools elsewhere in London.

Sport and recreation

- More sport and recreation facilities, including playing pitches, will be needed over the long-term.
- Some areas are not as well served as others for children's play space and equipment.

New ways of delivering services

- Service providers are seeking new ways to maintain and improve services, such as by modernising their buildings and facilities.

Main issues

Meeting the needs of our growing population

Lewisham's population growth will create extra demands for community facilities and services (including education, health and social care) which needs to be managed.

Many providers of facilities and services

A range of public and private sector bodies provide community facilities and services - a joined-up approach is needed to ensure local needs are effectively met.

Funding
Some community facilities and buildings require funding to cover regular maintenance and repairs.

Using facilities more effectively

We may need to think differently about how facilities are used, and the best ways of providing for the needs of communities within the resources available. This may include re-purposing facilities, for example, converting full-sized playing pitches to smaller ones could better meet the needs of children and young people.

We're proposing to...

Ensure neighbourhoods are well supported with facilities and services

- Prepare an Infrastructure Delivery Plan (IDP) to identify and monitor needs

- ~~Work with our partners to deliver community facilities and services, and ensure these are provided in the right places.~~

~~Make the best use of facilities and secure new ones~~

- ~~Ensure Lewisham's needs for education, health and social care facilities and services are met~~
- ~~Require larger housing developments to provide, or help to fund, new community facilities in areas where many more people will be living.~~

~~Provide high-quality facilities accessible to all~~

- ~~Ensure facilities are built and maintained to a high quality standard~~
- ~~Encourage the shared use of facilities so more people benefit from them~~
- ~~Improve access to recreational opportunities~~

~~. Improve the quality of play space and access to it, especially where space is lacking~~

~~<Did you know?>~~

~~The New Generation (TNG) Youth and Community Centre in Sydenham has won awards for its innovative and high quality design, which was created with input from young people. This includes recognition from the Royal Institute of British Architects (RIBA).~~

Commented [NE451]: Not required for Regulation 19 plan

CI 1 Safeguarding and securing community infrastructure

A. The Council will work ~~collaboratively~~ in partnership with stakeholders and its delivery partners to identify ~~current and projected future requirements~~ needs for community infrastructure over the plan period, and to secure the ~~necessary~~ timely ~~provision~~ delivery of ~~this~~ high quality infrastructure and services to meet these needs. Local n~~N~~eeds for ~~provision~~ community infrastructure in the Borough will be considered ~~having regard to~~taking into account the Infrastructure Delivery Plan~~,~~ along with the relevant corporate plans and strategies of the Council and ~~its~~ other key stakeholders, including for: health and social care~~,~~; education and childcare~~,~~; youth and family services; play, sport and recreation;~~al and other community services;~~ libraries and local history services; and burial space.

B. ~~Proposals for~~ M~~m~~ajor development proposals will be expected to, and all other development proposals should, plan positively to meet local ~~area~~ needs for community infrastructure. Where a site allocation policy sets out requirements for community infrastructure, ~~Major d~~developments ~~may be~~proposals will be required to ~~contribute to the~~demonstrate how the delivery of ~~community~~ this infrastructure will be secured through the masterplan process, with reference to Policy DM3 (Masterplans and comprehensive redevelopment). ~~particularly in~~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 ~~are acute deficiencies in facilities or services~~is an identified need for additional provision, as ~~identified~~ set out in the Infrastructure Delivery Plan. 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.

Commented [NE452]: Amended for clarity and to aid effective policy implementation

Commented [NE453]: Respond to consultation – policy should make clearer different routes to supporting improved provision of infrastructure

~~All development proposals should make the best of use of land, including the public sector estate. Innovative approaches to community infrastructure provision (such as the co-location of services, shared use of facilities and development of multi-use facilities) will be encouraged~~

Commented [NE454]: Moved to Policy CI2 below

C. ~~New d~~Development proposals will be supported where ~~it~~ they safeguard~~s~~ and enhance~~s~~ community infrastructure. ~~Where d~~Development proposals ~~would~~ that will result in the loss of an existing community facility, or land and buildings formerly in community use, ~~proposals must~~ will only be permitted where it is suitably demonstrated that:

a. There is no current or future need for the existing use or an alternative community use~~, including evidence of an active marketing campaign for the site covering a minimum continuous period of twelve months,~~ and there is adequate alternative provision elsewhere to ~~serve~~ meet the needs of the ~~area~~neighbourhood and wider community, taking into account the Infrastructure Delivery Plan. Applications must be supported by evidence of an active marketing campaign for community uses covering a minimum continuous period of twelve-months at a reasonable local market value for rent or sale; or

Commented [NE455]: Amended for clarity and to aid effective implementation

b. There are realistic proposals for r~~R~~eplacement provision of an equivalent or improved standard that will continue to meet the needs of the neighbourhood and wider community, ~~including in terms of design quality and functionality of use, is proposed to serve the needs of the area~~; or

Commented [NE456]: Policy wording amended to better align with the London Plan

Commented [NE457]: The requirement for 'improved standard' is explained more fully in the supporting text

c. The development is directly associated with a public service transformation programme and necessary to enable or sustain the delivery of service improvements and related investment in community infrastructure.

D. In exceptional circumstances, where there requirements of (C~~D~~) above cannot be satisfied, consideration will be given to the use of payment-in-lieu contributions. Development p~~P~~roposals ~~will be expected to~~must provide evidence to demonstrate that the existing or an appropriate alternative community use is not viable.

~~D.~~E. Policies CI1.C and CI1.D do not apply to development proposals involving the loss of sports and recreational facilities, which will be assessed against Policy CI3 (Sports, recreation and play).

Commented [NE458]: Respond to consultation – Sport England requested changes to ensure conformity with London Plan

Explanation

9.1. Community infrastructure is also commonly referred to as social infrastructure. It covers a range of services and facilities that contribute towards inclusive and sustainable neighbourhoods and communities by providing residents and visitors with opportunities to enjoy a good quality of life. Community infrastructure includes provision for health services, education and training, community facilities (including public houses), places of faith, and sport and recreation facilities for people of all ages and abilities. Green infrastructure is also a component of social infrastructure, although it is addressed separately in this Local Plan.

9.2. Community infrastructure is essential to supporting inclusive neighbourhoods and communities along with enabling healthy lifestyles, providing vulnerable people with

support and care, and giving children and young people the best start in life. We will therefore ensure that community infrastructure is safeguarded where there is an ~~strategic or local~~identified need for it, taking into account ~~having particular regard to~~ Lewisham's growing population and the different requirements of the groups within it. At the same time, it is important that opportunities are taken to improve or replace existing infrastructure in order to ensure that facilities within the Borough are maintained at a good modern standard. The Council has prepared an Infrastructure Delivery Plan (IDP) through consultation with service providers and delivery partners. It sets out the infrastructure required to support Lewisham's neighbourhoods over the long-term, including community infrastructure. The IDP will be regularly reviewed and updated over the plan period to ensure it reflects the latest available information on needs, project delivery and funding.

Commented [NE459]: Respond to consultation – clarity about the IDP and community infrastructure to support growth

~~9.3. New models of community infrastructure provision (such as multi-use and shared use facilities, or co-location of uses) can enable the consolidation or reconfiguration of services, which in turn can provide opportunities to make better use of land and assets. However, any such process to consolidate or reconfigure services, including the disposal of surplus or redundant assets, will need to be carefully managed. It is essential that the Borough's community infrastructure capacity is not compromised and that essential facilities and services are not unnecessarily lost, particularly where there is a demand from a growing population.~~

Commented [NE460]: Repetition – this is covered in Policy supporting text to CI2. The policy point on innovative design has been moved to CI2.

~~9.4.~~9.3. Where replacement community infrastructure is proposed applications must include a statement explaining how the new provision will result in demonstrable improvements, both in terms of design quality and functionality of use. This should include an assessment of the existing facility giving consideration to factors such as building condition, flexibility of use, amenities, safety, accessibility and current usage. If the replacement provision is proposed at a different site, applications should clearly set out the reasons why this is necessary and how local area needs will continue to be met. We will seek that new provision does not result in a net loss of floorspace for community use. However some flexibility may be applied where it can be shown that a reduction ~~would~~ will not compromise the delivery of services or provision of facilities.

~~9.5.~~9.4. Development proposals ~~Assessments will be required to justify~~involving the loss or transfer of community infrastructure within the Borough must be justified by a detailed needs assessment. The starting point ~~for any such~~for the assessment should be the ~~Infrastructure Delivery Plan (~~IDP~~).~~ ~~and,~~ Applications must provide a sufficient level of detail for the Council to assess local area impacts ~~depending on the~~ on infrastructure provision, taking into account the location and nature of community uses involved ~~on individual schemes,~~. Proposals are strongly encouraged to refer the relevant key plans and strategies~~, whether from the~~ of the Council~~, or~~ its ~~delivery~~ partners and other stakeholders. Whilst the IDP is subject to regular review it may not always reflect the latest available information for certain types of infrastructure. Unless the development proposal is demonstrably associated with a public service transformation programme, in line with Policy CI1.~~D~~C(c) above, or suitable replacement provision will be secured, applications must be also accompanied by evidence of an active marketing exercise~~, normally for~~ covering a minimum continuous period of ~~12~~ twelve months to help demonstrate that the site or facility is not suitable for a similar or alternative community use. ~~This should take into account the type of provision involved, its condition and site location. The loss of~~

~~community infrastructure will be strongly resisted where these requirements cannot be satisfied.~~

~~9.6.~~9.5. The loss or a change of use of existing community infrastructure will be acceptable where it is clearly demonstrated that the disposal of assets is directly associated with a service transformation programme and necessary to deliver investment in public infrastructure and related services. Applicants will be required to demonstrate through this programme that the facility in question is surplus to requirements or unviable in its current format, and that adequate provision will remain available to meet the needs of the local population. Where the public estate is involved, marketing information will not normally be required. ~~The Council will continue to engage with key stakeholders in health, education and other areas to ensure that key corporate programmes and priorities are reflected in the Infrastructure Delivery Plan, so that needs for provision can be appropriately identified and planned for.~~

~~9.7.~~9.6. In limited and exceptional circumstances, where it is suitably demonstrated that the requirements of (~~D~~C) above cannot be satisfied we may consider payment-in-lieu contributions. In these circumstances, we will require a statement clearly justifying why it is not feasible to re-provide the infrastructure, whether on-site as part of the redevelopment or off-site in kind. Where a loss is judged to be acceptable by the Council, payments will be negotiated on a case-by-case basis having regard to the type of provision in question, with contributions being invested in community infrastructure improvements within the Borough. Further details will be set out in an update to the Council's Planning Obligations SPD.

CI 2 ~~New and enhanced~~High quality community infrastructure

A. Development proposals for new community infrastructure~~, or~~ (including the alteration, extension or reconfiguration of existing ~~facilities~~community infrastructure), will be supported where the facility:

a. ~~The site and building l~~is appropriately located for the intended use; ~~and~~

~~a.~~b. ~~l~~is easily accessible by public transport, walking and cycling;

~~b.~~c. ~~The development has been~~Is designed to maximise the flexibility and adaptability of space to accommodate a range of community uses ~~and users, wherever practical and feasible~~;

~~c.~~d. ~~The development l~~includes provision of well-integrated facilities that ~~enable it to effectively~~support the effective functioning and viability ~~as a~~of the community use, such as meeting spaces, broadband connection, kitchen facilities, toilets and dedicated storage space;

~~d.~~e. ~~The facility is~~ Is made available for use by the public as much as reasonably practical, and does not unreasonably restrict access to the wider community; and

~~e.~~a. ~~There are clear arrangements to ensure the facility will be appropriately managed and maintained to an acceptable standard; and~~

f. ~~There is no~~Will not result in a significant adverse impact on the amenity of neighbouring uses and ~~the surrounding area~~properties ~~(including amenity, traffic, parking and safety impacts) consistent with other Local Plan policies~~.

Commented [NE461]: Amended for clarity and to aid effective implementation

Commented [NE462]: This is covered in amended paragraph 9.4

Commented [NE463]: Moved to B below

Commented [NE464]: Repetition – this is covered elsewhere in the plan

B. ~~All D~~development proposals ~~should~~must make the best of use of land, including the public sector estate. Innovative approaches to community infrastructure provision (such as the co-location of services, shared use of facilities and development of multi-use facilities) will be encouraged and supported where other Local Plan policies are satisfied.

C. Development proposals for new community infrastructure ~~There are~~ must ensure that ~~clear arrangements to ensure~~ the facility will be appropriately managed and maintained ~~to an acceptable standard~~over its lifetime.~~; and~~

Explanation

9.7. Community infrastructure is vital to supporting liveable neighbourhoods and ~~securing~~ inclusive communities. ~~and to meeting the needs of different groups within the Borough.~~ We will ~~therefore~~ be broadly supportive of development proposals involving new or enhanced provision of community infrastructure, particularly where this helps to meet local needs. The IDP should be referred for further information on needs for new or improved community infrastructure in different parts of the Borough.

9.8. Community f~~F~~acilities ~~and services~~ should be easily accessible by walking, cycling and public transport. ~~Applicants~~ Development proposals are encouraged to give priority to town and local centres in the site selection process. These locations generally benefit from higher Public Transport Access Levels. Community facilities can also support the vitality and viability of town centres by encouraging visitors and linked trips. However other locations ~~will be considered on an individual basis~~ may be appropriate~~,~~ recognising that some community uses may not be ideally located in centres owing to space constraints, site availability or other requirements ~~specific to the community service or~~associated with the ~~-~~facility. All proposals ~~will be expected to~~must demonstrate that the ~~proposed~~ site location is appropriate ~~to the community and group(s) it is intended to serve. This includes~~having regard to local need for the use, accessibility ~~consideration for the development's functional relationship~~ and compatibility with ~~adjoining and~~ neighbouring land uses.

9.9. All development proposals for community infrastructure~~, whether new build or changes to existing facilities, will be expected to~~ must investigate ~~opportunities to~~and, wherever feasible, incorporate design features that allow for flexibility and adaptability of ~~use~~ the facility over ~~the~~ its lifetime ~~of the development~~. ~~These design features should be implemented wherever practical and feasible. It is important that consideration~~ Consideration ~~is~~ should be given to ~~the use of space in~~ designs that can accommodat~~e~~~~ing~~ a wide range of community uses ~~and end users~~. Service providers and developers are encouraged to engage with each other ~~and to refer the Council's Infrastructure Delivery Plan~~ to identify ~~whether there are~~ opportunities for innovative designs that enable the co-location or shared use of facilities. ~~In addition to enhancing the overall functional integrity of the facility, such interventions~~ This can help to support the viability of community infrastructure through frequent usage (ensuring the facility is not underused during non-peak hours) and ~~by making~~make it more adaptable to the changing needs of the community over the long term.

9.10. Community facilities must be designed to a high quality standard using the design-led approach. They should be accessible and inclusive places that help to promote

Commented [NE465]: Policy supporting text amended throughout to make more concise and align with policy changes above

social cohesion. Development proposals ~~will be expected to~~must include well-integrated facilities that enable the effective use of the building as a community space. This may include kitchen areas, toilets and washing facilities, broadband connection, communal areas and meeting spaces, and generous dedicated storage space. ~~We will resist P~~proposals ~~that~~ will be refused where they do not suitably demonstrate that the development is designed to support the long-term viability of the community use, whether as a standalone building or part of a mixed use development. ~~full consideration has been given to the main community function of the development, or the elements within the development intended for community use, through the design-led approach~~.

9.11. ~~Applicants are encouraged to investigate opportunities for the shared use of facilities. This will help to ensure that a wide range of individuals and community groups can benefit from provision in the locality, and that facilities are not underused particularly during non-peak hours.~~ Development proposals for community infrastructure must make adequate arrangements for the maintenance and management of the facility over its lifetime. A Site Maintenance and/or Management Plan should be submitted prior to the occupation of development. Where facilities are integrated into ~~new development, for example in major residential development schemes~~new mixed-use developments, these should be made as accessible as reasonably practical. We will ~~resist~~ refuse proposals for facilities where these unreasonably restrict public access, for example, for reasons of resident tenure. ~~A statement setting out arrangements in respect of site management and maintenance should accompany proposals, and the Council may require a Management Plan prior to occupation.~~

Figure 9.1: Play space mapping and deficiency areas

CI 3 Sports, recreation and p~~P~~lay ~~and informal recreation~~

A. Development proposals should help to ensure that ~~All~~ people~~, and particularly children and young people, should~~ of all ages and abilities have access to a wide range of opportunities for sports, ~~play and informal~~ recreation and play. They should maximise opportunities to provide new or improved ~~with~~ community ~~facilities~~infrastructure, along with public realm enhancements, so that sports and recreation facilities and play spaces can be reached safely and easily throughout the Borough.

Sports and recreation facilities

B. Existing sports and recreational facilities should be retained. Development proposals involving the loss of such facilities will only be permitted where they comply with London Plan Policy S5 (Sports and recreation facilities). Applications will be assessed taking into account the Infrastructure Delivery Plan along with the Council's Playing Pitch Strategy, Physical Activity and Healthy Lifestyle Strategy and other strategies as appropriate.

Play and informal recreation

~~A.~~C. Development proposals that are likely to be occupied or used by children and young people ~~should seek to~~ must increase opportunities for play and informal

Commented [NE466]: Respond to public consultation – need more recognition that play should focus on all ages not only on children and young people

Commented [NE467]: Respond to consultation – Sport England request to ensure London Plan conformity re tests on proposals involving loss

recreation.~~,~~ ~~particularly~~ Where located in areas ~~where there are~~ with identified deficiencies in ~~provision~~play space, new housing development must provide demonstrable improvements in the quantity and quality of play space.

~~B.~~D. Development proposals for ~~N~~new housing ~~development will be expected to~~must incorporate well-designed and high quality formal play provision of at least 10 square metres per child. Provision should be ~~provided~~ delivered on~~-~~site and made accessible to all children in the development ~~irrespective of~~without being segregated by housing tenure. Off-site provision will only be acceptable in exceptional circumstances, where it can be suitably demonstrated that ~~delivery of play~~ on-site provision ~~on site~~ is not feasible and ~~residents~~ there is existing play space, or new provision that will be secured, in proximity to the development that can be accessed safely and easily by residents of the age group it is intended for~~of the development will not be adversely impacted~~. ~~Off-site provision will be required to~~must ~~be provided in line with the Council's Planning Obligations SPD~~. Where it can be demonstrated to the satisfaction of the Council that off-site provision is acceptable this will be secured through planning obligations and/or legal agreement, with payments in lieu calculated using the formula in Table 9.1 (Play space payments in lieu).

Table 9.1 Play space payments in lieu

Formula for calculating payments in lieu
X = ((A x B) – C)) x D
X = Financial contribution (£)
A = Number of children generated by the development (child yield calculated taking into account bedroom size(s) and tenure mix)
B = 10 square metres per child (play space requirement)
C = Square metres of play space proposed by the development
D = Average cost per square metre of play space

~~C.~~E. All ~~new~~ play space and provision for informal recreation ~~should~~ must be sensitively integrated into the site and ~~locality~~neighbourhood, and be designed ~~and managed~~ to:

a. Ensure ~~the provision is free to use, with unrestricted~~that public access is encouraged and not unreasonably restricted, and made free-to-use wherever secured as part of new housing development;

b. Provide a stimulating and pleasant environment that promotes ~~inter-generational integration~~social cohesion, ~~and~~ including by enabling~~es~~ users of different ages and abilities to interact as well as to move around and play independently;

~~b.~~c. Provide opportunities for respite, such as benches or seating areas;

~~c.~~d. ~~Help ensure the safety of children and young people, including through layout and design features that allow for~~Enable informal ~~community~~ supervision through passive surveillance;

~~d.~~e. Integrate natural features such as trees, landscaped play areas and other greening measures; ~~and~~

Commented [NE468]: Amended to strengthen policy

Commented [NE469]: Respond to consultation and Member feedback – to make clear the requirement tenure neutral design

Commented [NE470]: Amended for clarity and to aid policy implementation

Commented [NE471]: Moved to F below as D deals with design rather than management matters

Commented [NE472]: Amended for soundness - it is recognised that play and recreation space may be integrated into community uses (such as leisure centres or soft-play centres) where a fee may be required. The policy is clear that play space secured as part of new housing development must be free to use

f. Maximise the use of permeable surfaces and Sustainable Drainage Systems; and

~~e.~~g. Site outdoor communal amenity and play spaces at the street level or ground floor of development, avoiding the use of rooftops and mezzanines.~~.~~

F. Where large-scale public realm is provided as part of a development proposal, this should incorporate incidental play space to make the public realm more playable. Incidental play space should supplement formal play provision elsewhere in the Borough and provide additional opportunities for physical activity ~~in the urban environment~~.

~~D.~~G. Development proposals including new or enhanced play space must ensure the provision will be appropriately managed and maintained over its lifetime.

~~E.~~H. Development proposals that will result in the ~~not~~ loss of ~~existing~~ play space, whether existing or consented but not built, will be ~~strongly resisted~~refused unless:

a. Replacement provision of at least an equivalent ~~size~~ amount and improved quality will be provided, either on~~ the~~ site or in ~~its vicinity~~proximity to it, within a reasonable walking distance for the intended age group~~, to meet the needs of children and young people in the locality~~; or

b. It can be suitably demonstrated that ~~the loss would not result in a shortfall of provision in the locality, having regard to existing and projected future need~~ that there is no ongoing or future demand for the play space, with reference to the Lewisham Play Strategy.

Explanation

9.12. ~~We are committed to ensuring that children and young people in Lewisham are given the best start in life. In order to achieve this objective it will be necessary that an abundance of opportunities are available for play and informal recreation.~~ Healthy and liveable neighbourhoods provide ample opportunities for people of all ages and abilities to participate in sport, recreation and play. Safe and stimulating play is essential to childhood development. It can ~~positively~~ impact positively on physical health, ~~with particular benefits in~~ helping to address and prevent ~~childhood~~ obesity.~~, which~~ This is a key issue in Lewisham as 21 per cent of school children in Reception are obese, rising to 37 per cent in Year 6. Further, some 58 per cent of adults are obese.[123] Play is also important to mental health and wellbeing as it provides opportunities for learning and social interaction at the early stages ~~of~~ and throughout life.

9.13. The Lewisham Playing Pitch Strategy (2019) includes an audit of sports and recreational facilities within the Borough and an assessment of future requirements over the plan period. Overall, it concludes that the Borough's projected growth will result in a continued and rising demand for facilities. This includes dedicated facilities for sports such as football, cricket, rugby and field hockey as well as multi-purpose facilities, for example, leisure centres and sports halls. These future requirements are reflected in the IDP which development proposals will be expected to engage with. Given the current baseline situation it is unlikely that

[123] Lewisham Joint Strategic Needs Assessment: Picture of Lewisham, Part B. 2019.

Commented [NE473]: Amended to align with Council's Parks and Open Spaces Strategy

Commented [NE474]: Moved from D above

Commented [NE475]: Policy supporting text amended throughout for clarity and to aid policy implementation

Commented [NE476]: Factual updates to help justify the policy approaches

there will be a surplus of this type of infrastructure and the Local Plan therefore protects land and facilities that are in use for sport and recreation. Development proposals involving the loss of these types of uses will be considered against London Plan policy S5 (Sports and recreation). The Local Plan site allocations make provision for community uses that will help to enable identified needs to be addressed as new development is delivered, particularly within the Opportunity Areas. Further opportunities will be considered in the Council's Physical Activity and Healthy Lifestyle strategy.

Commented [NE477]: Respond to consultation – Sport England request for additional information on Playing Pitch Strategy

~~9.13.~~9.14. The Lewisham Open Spaces Assessment (2019) ~~undertook~~ includes an audit of formal play provision in the Borough, ~~by~~ looking at ~~the various types of existing~~ provision ~~suited to~~for different age groups. ~~The study concluded that w~~Whilst there is satisfactory provision across the Borough there are deficiencies ~~present~~ in some areas, most notably to the south-east of Catford.[124] To address local deficiencies and improve access to provision throughout the Borough, ~~All~~ new development, particularly for housing and community infrastructure, should ~~therefore~~ investigate and seek to increase opportunities for play for all age groups, taking into account the types of provision needed for them~~, including by enhancing existing provision, particularly in areas where there are deficiencies. This includes consideration for the types of provision required by different age groups~~.

Commented [NE478]: Respond to consultation – more emphasis on play provision for all age groups

Commented [NE479]: Repetition – this is clearly set out in the policy

~~9.14.~~9.15. In line with the London Plan, n~~N~~ew ~~residential development~~housing ~~schemes~~ developments ~~will be required to~~must provide formal play space of at least 10 square metres per child in order to address child occupancy and ~~play space~~ requirements generated by the development. ~~This benchmark is consistent with that set out in the draft London Plan.~~ Provision should be proportionally based on the number of children expected to occupy the development and an assessment of future needs. ~~The expectation is that p~~Play space~~rovision~~ ~~will~~ should be delivered on-site. ~~,~~Off-site provision will o~~O~~nly be considered in exceptional circumstances ~~should off-site provision be considered~~. Applicants will be required to provide evidence to demonstrate that delivery on-site is not feasible, including a design options appraisal, and that the needs ~~of existing residents will continue to be met~~generated by the development will be adequately met. ~~Normally, O~~off-site provision will be more appropriate for older children and young people as they are able to travel slightly longer distances by walking and cycling. As well, suitable play provision for this group might not be compatible within the development and could be better provided elsewhere, for example, as with skateboard parks. Off-site provision will be secured by planning obligations or legal agreements, using the formula set out in Table 9.1 (Play space payments in lieu). Additional details on the play space standard and off-site provision ~~the application of this policy and the benchmark requirement are~~ are set out in the Council's Planning Obligations SPD and relevant London Plan ~~supplementary planning~~ guidance, currently the Play and Informal Recreation SPG.

~~9.15.~~9.16. All new play space should be ~~designed to a high quality standard. It should also be sensitively integrated into the site and its surrounds. Play space should be central to~~ delivered through the design-led approach with careful consideration given to the ~~specific play~~ requirements of the intended users. Play space and other

[124] The scope of the open space assessment only included play sites that are in ownership and/or management of Lewisham Council. It is recognised that overall levels of play provision will also include space made by private providers and developments. The assessment provides a baseline position for applications to consider appropriate provision of play space in the locality.

outdoor communal amenity space should be integrated at the street or ground floor level. The siting of provision on rooftops and mezzanine levels should be avoided as this may impede safe access and lead to provision being sited where microclimate conditions are not suitable. Rooftop and mezzanine space will only be acceptable where there is a clear design rationale and the provision is of an exceptional quality. ~~Applicants are strongly encouraged to~~Developments should maximise opportunities to integrate natural or semi-natural features into play space ~~provision~~, including tree planting and landscaped play areas. Naturalised spaces provide for stimulating and pleasant environments, enhance access to nature, and ~~. This is important in an urbanised setting like Lewisham, where it can be more challenging for children and young people to access biodiversity on a regular basis. Naturalised play spaces~~ also help to reduce the need for hardstanding which is important for climate change adaptation and mitigation~~, for example, by reducing the heat island effect and enabling sustainable drainage~~.

~~9.16.~~9.17. To support inclusive neighbourhoods and communities we will seek to ensure that all play space is free to use and made accessible to the wider public. ~~We will strongly resist~~ Development proposals that unreasonably restrict access to play space, for example, by fencing or other ~~interventions~~ measures~~designed to provide for exclusive access to residents of particular developments~~ will be refused. Play space to which access is segregated by housing tenure is wholly unacceptable. It is recognised that some controls ~~play provision~~ may ~~need~~ be required in the interests of public health and safety as well as local amenity, for example, ~~to be limited~~ to ensure the use of facilities is limited to regular daytime or early evening ~~operating~~ hours ~~to protect the amenity of residents~~. ~~-~~Site Management and/or Maintenance Plans should be submitted to address any such matters, along with arrangements for upkeep of space and equipment over the lifetime of the development.

~~9.17.~~9.18. Activity and play need not be restricted to parks and other types of formal play spaces. Incidental play space can be provided where features of the urban environment are made more playable. This is particularly in areas with large-scale public realm (for example around town centres, stations and community facilities) where people of all ages are likely to visit. The design of the ~~wider urban environment~~ public realm should encourage everyone~~, and particularly children and young people,~~ to move around freely and independently in active ways, having regard to the Healthy Streets Approach and relevant good practice guidance, such as Sport England's Active Design Guidance. ~~Therefore all d~~Development proposals should ~~give consideration to~~assess how the design and configuration of spaces and buildings~~, and how these~~ might function to impede or enhance safe access to play opportunities.

CI 4 Nurseries and childcare facilities

A. Development proposals for day nurseries and childcare facilities (including child minding, playgroups and related activities) must ~~be appropriately located and designed having particular regard to~~:
   a. Be located where they can be safely and easily accessed ~~Accessibility~~ by walking, cycling and public transport;
   b. Not have an unacceptable adverse i~~I~~mpact on ~~traffic movements~~ the road network and ensure adequate arrangements for car parking including access,

Commented [NE480]: Included to support new policy criterion D.g above, in line with new Parks and Open Spaces Strategy

Commented [NE481]: Consultation –request to signpost guidance

egress, cross-site movement and drop-off areas, with consideration given to needs of disabled users;

c. Protect, manage and not adversely impact on local ~~Protection of~~ amenity ~~of adjoining and neighbouring uses~~;
d. Respond positively to l~~L~~ocal character; and
e. Secure p~~P~~rovision of fit-for-purpose facilities to accommodate the intended use and all likely users, including suitable outside play space where appropriate.

B. The use of residential floorspace for day nurseries and childcare facilities will only be supported where it is demonstrated that:
   a. The development ~~does~~ will not result in the loss of a dwelling and the residual residential floorspace meets the requirements and standards for self-contained housing, as set out ~~in~~ elsewhere in the Local Plan;
   b. The community use is ancillary to the residential use;
   c. There is a ~~specific local area need~~demonstrable local need or market demand for the ~~community~~ use proposed; and
   d. There are no suitable and available non-residential premises to accommodate the use.

Explanation

9.19. Lewisham's Childcare Sufficiency Assessment (2016) provides a baseline assessment of early education and includes key priorities for the childcare market in Lewisham. We are committed to ensuring that there is sufficient provision of good quality, affordable and flexible provision to accommodate the diverse needs of households within the Borough. All development proposals for nursery and childcare provision should therefore ~~engage with~~refer the latest ~~most recently published~~ Council assessment to identify opportunities for meeting demand and area specific requirements. ~~Such evidence can help to support proposals where conversion of a self-contained dwelling is proposed.~~

~~9.18.~~9.20. ~~As with all types of community infrastructure,~~ New nurseries and childcare facilities should be appropriately located ~~within the Borough. Priority should be given to~~ at safe, well-connected and easily accessible ~~sites~~locations~~, and where the impacts of additional movements arising from the use can be appropriately managed and mitigated~~. ~~We will expect that~~ Aapplicants ~~fully~~ should investigate opportunities to locate such uses in ~~existing D Use~~ Class E ~~premises~~units ~~, or other appropriate sites,~~ before considering ~~the use of existing~~ residential premises. Where it is proposed to incorporate a nursery or childcare facility within an existing self-contained (Class C3 ~~Use Class~~) property, this must not result in the loss of a dwelling unit~~, consistent with other Local Plan policies~~. In most circumstances a detached C3 use will be ~~seen as~~ more appropriate than a semi-detached unit, which in turn is preferential over a terraced dwelling. End of terrace locations will be treated the same as semi-detached properties. We may apply conditions to ensure residential uses are reinstated in any future change of use from a ~~community facility~~Class E community use.

~~9.19.~~1.1. ~~Lewisham's Childcare Sufficiency Assessment (2016) provides a baseline assessment of early education and includes key priorities for the childcare market in Lewisham. We are committed to ensuring that there is sufficient provision of~~

Commented [NE482]: Amended for clarity and to aid policy implementation

Commented [NE483]: This has been moved from elsewhere in the supporting text.

~~good quality, affordable and flexible provision to accommodate the diverse needs of households within the Borough. All proposals for nursery and childcare provision should therefore engage with the most recently published assessment to identify opportunities for meeting demand and area specific requirements. Such evidence can help to support proposals where conversion of a self-contained dwelling is proposed.~~

~~9.20.~~9.21. It is important that nurseries and childcare facilities are designed to a high quality standard and ~~are fit-for-purpose, meaning that they function to~~will meet the needs of specific uses and ~~likely range of~~all intended users. ~~All~~ Development proposals ~~will be expected to be accompanied by a statement~~ must demonstrate how the policy requirements will be satisfied. A statement should be submitted setting out details of operations including: nature of activity; numbers of staff and visitors expected; days and hours of operation; access, parking and servicing arrangements; and measures to protect local amenity. ~~Proposals will be resisted where the development is not sufficiently suited to meeting the needs of all users of the facility, or where it will give rise to significant adverse impacts on the local area.~~

Commented [NE484]: Moved to first paragraph.

Commented [NE485]: Repetition – this is set out in the policy above

CI 5 Burial space

A. The Council will help to ensure that provision is made for the different burial needs of Lewisham's communities by protecting ~~maintaining~~ existing cemeteries and working with stakeholders to appropriately maintain these, along with ~~ensuring~~ seeking opportunities to enhance ~~access to~~the capacity of existing ~~spaces~~ facilities for new burial~~s~~ space, where appropriate.

B. Development proposals involving the provision of new burial space or related facilities must demonstrate that the provision:
   a. Adequately meets the requirements of the various groups within the Borough, including those groups for whom burial is the only option;
   b. Is appropriately located and within ~~close~~ reasonable proximity to the community it is intended to serve; ~~and~~
   c. Identifies and appropriately responds to potential flood risk issues, including through the incorporation of mitigation measures~~.~~; and
   ~~c.~~d. Will not adversely impact on open spaces and biodiversity, with reference to other Local Plan policies.

Commented [NE486]: Amended to provide greater flexibility for delivery of infrastructure to meet needs

Commented [NE487]: Respond to consultation – recognition that some burial spaces are designated open spaces and contain biodiversity sites

Explanation

~~9.21.~~9.22. Burial requirements vary amongst London's diverse communities and different faith groups. Community cohesion and integration can be undermined in the absence of suitable local provision. There is no statutory duty for the Council to provide burial spaces however recognising the importance of providing opportunities for all individuals and communities to practice their faith, we have an interest in supporting provision to meet local needs wherever possible.

~~9.22.~~9.23. Information on burial space provision is drawn from Lewisham's Open Space Study (2019) and the Greater London Authority commissioned research report, An Audit of London Burial Provision (2011). There are four cemetery sites in

Lewisham: Brockley and Ladywell, Hither Green, Grove Park, and Bromley Hill (which is run by Bromley Council). The GLA audit concluded that Lewisham is in the 'adequate' category of capacity typologies. This is owing to the amount of reserve land in Lewisham's cemeteries, which indicates it is probable that demand for burial space over the short to medium term can be met. We will therefore seek to protect the Borough's existing provision of burial space.

~~9.23.~~9.24. The Council is currently in the process of carrying out a local assessment of burial space provision. This will support our ongoing monitoring of provision and assist stakeholders in planning positively to meet community needs. We will continue to assess capacity available to meet Lewisham's identified needs over the plan period, taking into account new planned provision and the impact of changes in legislation, including The Social Fund (Children's Funeral Fund for England) Regulations 2019.

Commented [NE488]: As part of ongoing work on Infrastructure Delivery Plan, officers are engaging with relevant Council service area to confirm the latest position on need. Updates will be included in the plan where appropriate.

~~9.24.~~9.25. Where capacity issues arise the re-use of existing spaces can assist in meeting demand and would be considered. The re-use of burial space is encouraged by the London Plan, following provisions set out in Section 74 of the Local Authorities Act 2007 and Section 25 of the Burial Act 1857 allowing for the re-use of graves in certain circumstances. The Council will seek to ensure that any proposals for re-use of burial space comply with the statutory requirements and are sensitive to the site, its surroundings and the local community.

10 Green infrastructure

What you've told us

Green and open spaces are vital to:

- Leisure, health and well being
- Nature and wildlife
- Tackling climate change
- Making town centres other places attractive

Green and open spaces should be protected from:

- New developments
- Being paved over, especially gardens

More should be done to make the borough greener by:

- Tree planting
- Providing more and better quality pocket parks in built up areas
- Creating new green spaces in large developments

What we've learned

Lewisham is very green

- Green spaces cover one-fifth of the Borough.
- Lewisham was named one of the top boroughs in a recent Good Parks for London report.
- 15 parks have the Green Flag award for outstanding quality.

Some areas are better served than others

- People lack good access to parks, open space and nature in some areas
- Our Open Space study shows how some spaces are of fair or poorer quality
- Population growth will put extra pressure on parks and open spaces - more are needed to maintain current public access standards.

Opportunities to improve nature sites

- The Lewisham Biodiversity Action Plan and other key strategies highlight opportunities to improve the natural environment.

Main issues

National park city

The draft London Plan aspires for London to be a National Park City, and at least 50 per cent green by 2050 - Lewisham will have to play its part.

Access to open space

More and/or better provision will be needed in some areas to ensure everyone benefits from easy access to good quality parks and open spaces.

~~Meeting the needs of our growing population~~

~~Creating new large open spaces will be challenging as land is needed for homes and jobs~~

~~Biodiversity and nature~~

~~The council is now required to ensure the Local Plan delivers net gains in biodiversity.~~

~~We're proposing to…~~

~~Protect and enhance green spaces and nature sites~~

- ~~Protect spaces and enhance their quality, for example, with new visitor facilities.~~
- ~~Enhance the quality of waterways, such as the Rivers Thames, Ravensbourne and Quaggy~~
- ~~Review open spaces and nature sites, and where appropriate, update their boundaries and level of protection for nature conservation.~~

~~Improve public access to spaces~~

- ~~Prioritise the creation of new open space in areas that are lacking~~
- ~~Enhance routes and entrances to parks and open spaces~~
- ~~Improve walking and cycle routes, such as the Green Chain, Thames Path and Waterlink Way.~~
- ~~Require larger developments to provide new public open space and/or fund improvements to spaces nearby~~

~~Promote urban greening~~

- ~~Set greening standards for larger developments~~
- ~~Promote the use of green roofs and walls~~

~~We've also considered~~

~~If we should allow some open spaces to be re-shaped to improve their quality (with no overall loss of space) or not provide such flexibility.~~

~~Making changes to the boundaries of spaces, or to their status as open spaces / sites of importance for nature conservation, drawing on our studies.~~

~~<Did you know?>~~

~~Lewisham was named in the top 3 of all London boroughs in the latest 'Good Parks for London Report'. This is based on parks services in categories such as public satisfaction, quality, supporting nature and community involvement.~~

Commented [NE489]: Not required for Regulation 19 plan

GR 1 Green infrastructure and Lewisham's Green Grid

A. Lewisham's network of green and open spaces, waterways and green features ~~(such as parks, street trees and residential gardens)~~ are a fundamental component of the natural environment. This network makes an important contribution to the Borough's local distinctiveness including its character and heritage~~.~~. It is~~They are~~ also integral to supporting sustainable neighbourhoods and communities by ~~and healthy lifestyles,~~ providing a wide range of multifunctional environmental, social and

Commented [NE490]: Removed - green infrastructure is fully defined in supporting text and includes these elements

economic benefits. Development proposals must protect ~~Green infrastructure should be protected and opportunities taken to~~ and seek to enhance provision of green infrastructure across the Borough, including by ~~enhancing~~ improving or creating new links between ~~green infrastructure~~its different elements.

B. Development proposals ~~will be expected to~~must investigate and maximise opportunities ~~for~~ to ~~enhancing~~ enhance existing green infrastructure and creat~~inge~~ new provision on site ~~through the design-led approach~~, with reference to the All London Green Grid. Consideration should be given to the site~~'s~~ context including its setting within the wider landscape. ~~and~~ Development proposals must make suitable arrangements for the long-term management of green areas and planting. This includes provision of sufficient space where large canopy trees can be retained and new trees established without pressure for their future removal.

Explanation

10.1. Green infrastructure refers to the Borough's network of green and open spaces, waterways, street trees, green roofs, public and private residential gardens, allotments and other assets, such as semi-natural and natural drainage features~~, across the Borough~~. It includes parks and public spaces as well as private gardens and other spaces with vegetation. Together these elements of the environment help to support strategic objectives across a number of policy areas such as: promoting public health and wellbeing, mitigating against and adapting to the impacts of climate change (including by reducing flood risk), improving air and water quality, and conserving natural habitats and species. A strategic approach to green infrastructure is necessary to ensure that green assets are protected, planned for, designed and managed in an integrated way. In London's ~~metropolitan and heavily~~ urbanised ~~setting,~~context it is important that the multifunctional benefits of green infrastructure are recognised and proactively addressed. Green infrastructure must ~~is~~ not be considered in isolation of other ~~features~~ aspects of the built environment.

10.2. Whilst the environmental value of green infrastructure is clearly evident its social and economic value is becoming increasingly recognised. Lewisham's Open Spaces Assessment (20~~19~~20) includes information on the natural capital account, which considers the economic, social and environmental value of green infrastructure.[125] Research indicates that Lewisham currently enjoys benefits accruing from green infrastructure to a value of up to £2.1 billion, a figure that is comparable to the adjacent inner-London Boroughs. This helps to put into perspective the wider benefits of the local network of green infrastructure.

10.3. ~~In addition, t~~The protection and enhancement of green infrastructure in Lewisham is necessary to support the ~~draft~~ London Plan objective to make London at least

[125] The Corporate Natural Capital Accounting (CNCA) is a methodology used to assess the social, economic and environmental value of green infrastructure, and was developed by the Natural Capital Committee in its report to the UK Government. It considers factors such as the costs of public inactivity, the value of recreational visits to green infrastructure, impact of green infrastructure on property values, and the value of the various environmental functions green infrastructure performs. See Lewisham's Open Space Assessment (20~~19~~20) for further details.

50% per cent green by 2050, so that it can achieveand to support its National Park City status. Many of the Borough's trees are located in private gardens especially at the ends of rear gardens where combined garden areas provide the space for large canopy trees to develop and mature. These trees contribute to the Borough's urban forest and providing provide benefits including rear outlook amenity, wildlife habitat, air pollution reduction, improved ground drainage, climate change mitigation and health and wellbeing benefits. Development proposals need to maximise opportunities toshould retain these trees for their ecosystem services and avoid compromising and encroaching available space for them. This includes, for example, smaller developments involving when considering rearbuilding extensions, the location of garden studios, when redeveloping whole sites and the subdividing of houses and gardens as well as larger redevelopment schemes.

10.4. The London Mayor has prepared supplementary planning guidance on the All London Green Grid (ALGG).[126] The ALGG promotes the creation of a high quality and multifunctional green infrastructure network across London with the principal aim of supporting sustainable communities. The ALGG includes different types of open spaces, green corridors and the linkages between these (including wider public realm, corridors along transport routes, footpaths and cycle ways). The ALGG defines a number of Green Grid Areas across the region and Lewisham sits within the 'South East London Green Chain Plus' area. The Local Plan helps give effect to the ALGG and some of the key strategic objectives are reflected in the sub-areas section of this Plan. All development proposals will be expected to positively engage with the ALGG guidance in supporting a linked network of green infrastructure locally that improves public access to open spaces.

Figure 10.1 Grid Green Framework

GR 2 Open space and Lewisham's green grid

A. Open spaces are integral components of Lewisham's network of green infrastructureGreen Grid and will be protected from inappropriate development, in accordance with Lewisham's open space hierarchy.

Designated Open Spaces

B. Metropolitan Open Land (MOL) and Local Green Space (LGS) are afforded the same level of protection as Green Belt. Development proposals on MOL and LGS will be considered in accordance with the London Plan and national planning policies that apply to Green Belt land.

C. Development proposals involving the loss of Strategic Open Space will be strongly resisted and only permitted in the following exceptional circumstances:
   a. Replacement provision of at least an equivalent amount (i.e. no net loss) and better quality will be provided. The replacement provision must:
      i. Be located within the Borough and in reasonable proximity to the existing open space, with equivalent or better access by walking, cycling and public transport;

[126] Green Infrastructure and Open Environments: The All London Green Grid. Supplementary Planning Guidance. 2012. Mayor of London.

Commented [NE491]: To reflect that London became a National Park City in 2019

Commented [NE492]: Moved from Policy GR2 Open Space supporting text

Commented [NE493]: Respond to consultation - Policy (and associated Appendices in Part 5) amended throughout. Policy is revised in line with findings of new Open Space Review and MOL Review – Additional Sites Report which cover the physical extent of open spaces. Policy also amended to provide clarity on the hierarchy of open spaces, the level of protection afforded to each, and tests for assessing the re-configuration or loss of open space.

ii. Not result in an increase in public open space deficiency;
iii. Be publicly accessible;

b. The development will provide a wider public benefit which clearly outweighs the loss of the existing open space;
c. There will be no adverse impact on biodiversity, with reference to Policy GR3 (Biodiversity and access to nature);
d. Suitable replacement provision will be made for outdoor sports facilities or playing fields, with reference to London Plan policy S5 (Sports and recreation facilities), as well as allotments and community gardens where appropriate; and
e. Where the development involves part of an area of open space the quality of any remaining open space will not be eroded by the development.

D. Where development proposals satisfy the requirements of GR3.C above, the full quantity of replacement open space must be secured prior to the commencement of the development. Planning conditions and/or legal agreements will be used to ensure the open space is appropriately secured.

E. Neighbourhood forums are encouraged to undertake detailed assessments to identify appropriate sites to designate as Local Green Space in neighbourhood development plans.

Neighbourhood Open Space

F. Development proposals involving the reconfiguration of ~~existing~~Neighbourhood O~~o~~pen S~~s~~pace will only be supported where:
a. There is no net loss of open space, including play space, and net gains are achieved wherever possible;
b. There is no detrimental impact on the environmental function of the open space, including support for nature conservation;
c. There will be d~~D~~emonstrable improvements in the quality of open space ~~provision will be achieved, particularly in addressing identified deficiencies in the quality and quantity of open space in the locality~~ and public access~~ibility~~ to it;
d. The reconfiguration is delivered through comprehensive development, in line with a site wide masterplan, and will ensure a viable future for the open space.

G. Development proposals resulting in the net loss of Neighbourhood Open Space will be only be permitted where it is demonstrated that:
a. The development will provide a wider public benefit which clearly outweighs the loss of the open space;
b. The development cannot feasibly be delivered without the loss of part or all of the open space;
c. A design options appraisal has been used to ensure the minimal amount of open space will be lost and that any remaining open space is of a higher quality, with greater multifunctional use (for example play space, habitat creation or climate change adaptation measures);

d. There will be improvements to the quality of the remaining open space; and
e. Appropriate provision is made for existing play space and market space with reference to CI 3 (Play and informal recreation) and EC 20 (Markets).

~~B.~~A. ~~Development proposals, particularly those located within areas that are deficient in open space, should maximise opportunities to introduce new publicly accessible open space and improve connections to existing or planned new open spaces. All major developments will be expected to incorporate publicly accessible open space unless it can be clearly demonstrated that this is not feasible.~~

~~C. Development proposals involving the loss of open space will be strongly resisted. In exceptional circumstances the loss of open space will be permitted where replacement provision of at least an equivalent amount and better quality is provided within the local area catchment. All replacement open space must be publicly accessible.~~

~~D.~~A. ~~Development proposals involving the reconfiguration of existing open space will be supported where:~~

~~a. There is no net loss of open space and net gains are achieved wherever possible;~~

~~b.~~a. ~~There is no detrimental impact on the environmental function of the open space, including support for nature conservation;~~

~~c.~~a. ~~Demonstrable improvements in open space provision will be achieved, particularly in addressing identified deficiencies in the quality and quantity of open space in the locality and public accessibility to it;~~

~~d.~~a. ~~The reconfiguration is delivered through comprehensive development, in line with a site wide masterplan, and will ensure a viable future for the open space.~~

Ancillary uses

~~E.~~H. Development proposals for ancillary uses on open space ~~(such as outdoor leisure facilities, outdoor play and fitness equipment, refreshment facilities, event space and public toilets)~~ that help to improve the quality of open space and promote access to a wide range of users will be supported where they:

a. Are demonstrably ancillary to the use of land as open space;
b. Are necessary to facilitate or support the appropriate use of the open space;
c. Do not have a detrimental impact on the environmental function of the open space, including support for nature conservation;
d. Respond positively to local character, including by maintaining or enhancing the visual quality of the open space and its setting;
e. Are of a scale and function that is proportionate to the nature of the open space; and
f. Are ~~designed to~~of a high quality ~~standard~~ design, ~~are~~ including by following ~~accessible and~~ inclusive ~~to all~~ and safe design principles, and do not detract from the amenity provided by the open space.

Enhancing the quality and function of open spaces

I. Development proposals, ~~particularly those located within areas that are deficient in open space,~~ should maximise opportunities to introduce new publicly accessible open space, giving priority to green space, ~~and~~ as well as improve connections to existing or planned new open spaces, particularly in areas of open space deficiency. ~~All~~ M~~m~~ajor developments ~~will be expected to~~must incorporate new publicly accessible open space unless it can be clearly demonstrated that this is not feasible, in which case off-site contributions may be required.

~~F.~~J. With reference to Policy GR4 (Lewisham Links) d~~D~~evelopment ~~proposals will be expected to~~must maintain and wherever possible enhance access to and connections between ~~Lewisham's~~ the network of open spaces~~, including by improving access to and connectivity between these spaces~~ within and outside the Borough. Priority should be given to measures that encourage walking, cycling and other active travel modes along routes that link open spaces such as the South East London Green Chain, Waterlink Way, the Thames Path and other local elements of the All London Green Grid.

~~G.~~K. Development proposals located adjacent to open space ~~should~~ must respond positively to the character of the open space ~~and seek to~~as well as protect, and wherever possible enhance, the ~~habitat~~ biodiversity value and visual amenity provided by it.

~~H.~~A. ~~Neighbourhood forums are encouraged to undertake detailed assessments to identify appropriate sites to designate as Local Green Space in neighbourhood development plans.~~

Commented [NE494]: Moved to E above

Table 10.1 Lewisham's open space hierarchy

Categorisation	Description	Primary function
Metropolitan Open Land and Local Green Space	MOL and LGS are the highest order of open space in the Borough. As set out in the NPPF, they are afforded the same level of protection as Green Belt. MOL is designated on the Policies Map. LGS is designated in Neighbourhood Plans.	MOL are extensive areas of land bounded by urban development around London that fulfils a similar function to Green Belt. LGS are green spaces which are demonstrably special to a local community and hold a particular local significance because of their beauty, historic significance, recreational value, tranquillity, or richness of wildlife and biodiversity.
Strategic Open Space	Open spaces that are significant to the Borough's open space and wider green infrastructure network. Strategic Open Spaces are designated on the Policies Map.	Green spaces including: Parks and gardens, natural and semi-natural green space, green corridors, allotments and community gardens, outdoor sports facilities and playing fields and formal amenity green space.
Neighbourhood Open Space	Open spaces that make an important contribution to the liveability of neighbourhoods. These can include but are not limited to green spaces. Neighbourhood Open Spaces is not designated on the Polices Map.	Provision for children and young people, informal amenity space and civic and market squares and hard-surfaced areas designed for pedestrians.

Explanation

~~10.3.~~10.5. Open spaces form a vital component of Lewisham's ~~infrastructure and particularly its~~Green Grid and London's network of green infrastructure. Open spaces, including waterways and water spaces, make a significant contribution to the environmental quality and character of the Borough. They also play a key role in supporting the physical and mental health and ~~mental~~ wellbeing of the local

population by providing opportunities for leisure and recreation ~~and supporting~~ as well as enabling people to lead active lifestyles. Lewisham benefits from provision of a wide range of good quality open spaces which total around one-fifth of the area of the Borough. ~~They include urban green spaces, green corridors and a variety of public open spaces such as parks, cemeteries, churchyards, allotments and community gardens. There are also areas of Metropolitan Open Land which are designated through the London Plan.~~ Some open spaces contain protected habitats or species and are designated as Sites of Importance for Nature Conservation. Further details are set out in Policy GR3 (Biodiversity and access to nature).

Commented [NE495]: Deleted for clarity – the different typologies of open space and primary functions are set out in Table 7.1 above

~~10.4.~~10.6. As the Borough's population increases the pressure on existing parks and open spaces will invariably rise. The Lewisham Open Spaces Assessment (20~~19~~20) considers the amount of open space that is needed to support the projected future population over the plan period, based on a fixed quantity standard. This suggests that a significant amount of additional provision will be required to maintain the standard over the long-term. Due to the finite availability of land and ~~pressure~~ requirement to accommodate new development to meet local needs, such as for housing and workspace, there will be limited opportunities to create new larger open spaces, such as Local or District level parks. It is therefore vitally important that open spaces are protected, measures are taken to improve their function~~al~~ and quality, and that public access to open space is enhanced. As well, that major and other developments maximise opportunities to integrate new publicly accessible open space. The Lewisham Parks and Open Spaces Strategy will support the implementation of the Local Plan. It sets out key priorities for delivering improvements to parks and access to them.

10.7. In accordance with London Plan policy G4 (Open space), the Local Plan sets out a hierarchy of open spaces. It also includes policies to protect these spaces commensurate with their categorisation in the hierarchy (Table 7.1). The open space categorisations broadly reflect those set out in national and regional planning policy and guidance[127] but they have been adapted to reflect Lewisham's local circumstances. Metropolitan Open Land and Strategic Open Space are designated on the Policies Map whilst Local Green Space is designated in Neighbourhood Plans. These strategic open spaces and their boundaries have been informed by numerous evidence base studies.[128] Neighbourhood Open Spaces are not designated on the Policies Map. However the Local Plan recognises the important contribution these spaces make to liveable and sustainable neighbourhoods.

10.8. Development proposals involving the loss of Strategic or Neighbourhood Open Space should be avoided and will only be permitted exceptional circumstances, as set out in the policy above. The reconfiguration of Neighbourhood O~~o~~pen S~~s~~pace can be an effective approach to addressing deficiencies in the quantity and quality of provision. It can also help to overcome site constraints where it would otherwise

[127] This includes London Plan policy G4 (Open space), Table 8.1 and Planning Policy Guidance 17. It is noted that PPG17 was replaced by the NPPF and the Government's Assessing Needs and Opportunities Companion Guide by the NPPG. However, the Companion Guide's methodology and typologies continue to be recognised as good practice in London and England for land-use planning.
[128] Lewisham Open Spaces Assessment (2020), Lewisham Open Space Review (2022), Lewisham Metropolitan Open Land Review (2020) and MOL Additional Sites Report (2021). Neighbourhood Plans should be referred for information on Local Green Space.

be difficult to deliver new development, (such as for housing, workspace or community facilities) or area improvements. ~~We will therefore give consideration to~~Development proposals involving the reconfiguration of open space ~~where they~~must provide demonstrable improvements in the functional value of open and public access to it. In order to ensure certainty over the protection of open space and beneficial outcomes for the wider community and the environment, all proposals for reconfiguration must be delivered through comprehensive redevelopment and in line with a site-wide masterplan.

~~10.5.~~10.9. The Lewisham Open Spaces Assessment ~~(2019)~~ provides an overview of existing open space provision across the Borough and in neighbouring authorities. It includes an assessment of public access to these open spaces and identifies areas where there are deficiencies in access to certain types of provision. Whilst all development proposals should investigate and maximise opportunities to enhance open space this is particularly important in areas of deficiency. We will expect all ~~applications~~ development proposals to refer to and engage with the Open Spaces Assessment ~~(2019)~~, or any subsequent update, ~~to inform the planning and design process~~through the design-led approach. Furthermore, ~~applicants~~ proposals should refer the deficiency maps developed by Greenspace Information for Greater London (GiGL). These are regularly updated taking into account the latest available information on open spaces, and use a method of accurately mapping areas of deficiency in public access based on actual walking distances along roads and paths.

Figure 10.2: Open spaces

~~10.6.~~10.10. New development can help to enhance ~~provision~~ 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, ~~including through public realm enhancements,~~ particularly in areas of deficiency. Planning contributions towards open space provision may be sought, particularly where development is likely to ~~increase pressure~~generate additional demands on existing provision ~~in the local catchment area~~ such through the introduction of more residential units and households. Contributions may include measures that support public access to open space~~,~~ along with the functional quality and amenity value of it.

~~10.7.~~1.1. ~~The reconfiguration of open space can be an effective approach to addressing deficiencies in the quantity and quality of provision. It can also help to overcome site constraints where it would otherwise be difficult to deliver new development, such as for housing, workspace or community facilities. We will therefore give consideration to proposals involving the reconfiguration of open space where they provide demonstrable improvements in the functional value of open and public access to it. In order to ensure certainty over the protection of open space and beneficial outcomes for the wider community, all proposals for reconfiguration must be delivered through comprehensive redevelopment and in line with a site-wide masterplan.~~

~~10.8.~~1.1. ~~The London Mayor has prepared supplementary planning guidance on the All London Green Grid (ALGG).[129] The ALGG promotes the creation of a high quality and multifunctional green infrastructure network across London with the principal aim of supporting sustainable communities. The ALGG includes different types of open spaces, green corridors and the linkages between these (including wider public realm, corridors along transport routes, footpaths and cycle ways). The ALGG defines a number of Green Grid Areas across the region and Lewisham sits within the 'South East London Green Chain Plus' area. The Local Plan helps give effect to the ALGG and some of the key strategic objectives are reflected in the sub-areas section of this Plan. All development proposals will be expected to positively engage with the ALGG guidance in supporting a linked network of green infrastructure locally that improves public access to open spaces.~~

~~10.9.~~10.11. The NPPF ~~provides scope for~~enables neighbourhood forums to designate Local Green Space through the neighbourhood plan process. ~~National policy provides that~~ Local Green Space is afforded the same level of protection as Green Belt ~~land~~. ~~Neighbourhood F~~forums are well placed to identify high quality green spaces that are valued by the local community and whose protection ~~could~~ will ~~help to~~ support the Local Plan ~~objectives~~. ~~We will therefore encourage f~~Forums are encouraged to undertake detailed assessments to ~~support~~ justify the designation of Local Green Space~~. It is recommended that all such assessments apply~~ using a robust methodology. Assessments should be ~~and are~~ published as part of the ~~technical~~ evidence base~~. This will assist with public understanding of the proposals and~~ to support the plan-making and examination process.

Figure 10.3: Metropolitan Open Land

Figure 10.4: Open space deficiency – local parks

Figure 10.5: Open space deficiency – district parks

Figure 10.6: Open space deficiency – metropolitan parks

GR 3 Biodiversity and access to nature

A. The Council will work positively with stakeholders, including the Lewisham Biodiversity Partnership, to promote and secure the conservation, restoration and management of habitats as well as the protection of species. It will prepare a Local Nature Recovery Strategy (LNRS) as part of a strategic approach to ~~seek to~~ nature conservation and to deliver ~~net gains in B~~biodiversity Net Gain within the Borough.

B. ~~Nature conservation sites~~ Sites of Importance for Nature Conservation (SINCs) ~~will be~~are safeguarded in the Local Plan. ~~and~~ Development proposals must protect~~ed in order to preserve or~~ and maximise opportunities to enhance ~~priority habits and species, as well as to help ensure the public benefits from easy access to green spaces with~~the wildlife value~~, particularly by walking and cycling~~ of SINC sites. They must also protect and conserve protected and priority habitats and species that sit outside of the SINC network, with reference to the London Environment Strategy.

Commented [NE496]: Moved to GR1 above

Commented [NE497]: Respond to consultation – Designated Sites of Importance for Nature Conservation have been updated in line with recommendations of additional evidence base completed since the Regulation 18 stage. The designated spaces are set out in Local Plan Appendices, Schedule 8 and will be reflected on the Policies Map.

Commented [NE498]: Moved – criterion GR3.E moved to front end of policy

Commented [NE499]: Respond to consultation and officer review - Amended to respond to provisions in new Environment Act, and request for further information on how Council will deliver

Commented [NE500]: Respond to consultation – Make clear distinction between SINC and other sites. Also, clarification on what constitutes priority habitat or species; this is set out in the London Environment Strategy, which the policy now refers.

[129] ~~Green Infrastructure and Open Environments: The All London Green Grid. Supplementary Planning Guidance. 2012. Mayor of London.~~

C. Development proposals must seek to avoid harm to biodiversity including within SINC sites and Local Nature Reserves. In line with London Plan policy G3 (Biodiversity and access to nature), where it is demonstrated that harm is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy must be applied to minimise impacts:

a. Avoid damaging the significant ecological features of the site;
b. Minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site;
c. Deliver off-site compensation of better biodiversity value.

Commented [NE501]: Included to aid policy implementation and ensure consistency with higher level policies

D. Development proposals ~~must not adversely impact on~~that have the potential to impact on ~~internationally~~ designated international or national nature conservation sites ~~that are~~ located outside of the Borough must ensure that impacts are assessed in accordance with the relevant legislative requirements. Proposals will be considered having regard to national planning policies and legislation.

Commented [NE502]: Amended for consistency with the NPPF and planning legislation governing national and international designated sites

~~A.~~E. Development proposals ~~will be expected to identify and retain existing habitats and features of biodiversity value. They should also seek positive~~ should seek to secure Biodiversity Net G~~g~~ain~~s for biodiversity wherever possible~~. The BNG benchmark is a minimum 10 per cent increase in habitat value for wildlife compared with the pre-development baseline, calculated using an appropriate Biodiversity Metric.~~, particularly in areas that are deficient in public access to nature conservation~~. Biodiversity should be fully integrated into the design-led approach with consideration given to the site context and its ~~setting within the~~ wider landscape setting~~, as well as the layout, design, construction and management of buildings, spaces and their associated landscaping.~~

Commented [NE503]: Respond to consultation – additional requirements on Biodiversity Net Gain to align with provisions in the new Environment Act

Commented [NE504]: Repetition – considerations for design-led approach set out in Policy QD1

~~B. Development proposals on sites that are within or adjacent to Sites of Importance for Nature Conservation, Local Nature Reserves, Ecological Corridors or other sites of special biodiversity interest must protect and enhance the nature conservation value of the site. Development that has a direct or indirect harmful impact , either individually or in combination with other development, will only be supported where it can be demonstrated through the following approach that:~~

~~a. The harm to the special biodiversity interest cannot be reasonably avoided;~~
~~b. Where avoidance is not possible, the proposal will minimise and mitigate the impact;~~
~~c. Appropriate compensation is provided in exceptional circumstances where the benefits of the development clearly outweigh the harm to the biodiversity interests.~~

Commented [NE505]: Policy principles retained but re-phrased in policy C above to ensure consistency with NPPF and London Plan

~~C.A. Development must not adversely impact on internationally designated nature conservation sites that are located outside of the Borough.~~

~~D.~~F. All major development proposals and other development proposals that are likely to have a direct or indirect adverse impact on a SINC, Local Nature Reserve or other site~~s~~ with ~~special~~ biodiversity interests must ~~be accompanied by~~submit an Ecological Assessment carried out by a ~~suitably qualified assessor~~chartered

ecologist. Major development proposals adjacent to a SINC should consult the Lewisham Biodiversity Partnership to assist with the assessment of potential impacts on the site and opportunities to enhance the site's biodiversity value.

~~E. The Council will seek to manage positively the nature conservation value of habitats and sites by:~~

~~a. Securing management plans, where appropriate, in order to ensure the achievement of conservation objectives; and~~

~~Positively engaging with stakeholders, including the Lewisham Biodiversity Partnership, to protect and enhance the Borough's open spaces and sites of conservation value.~~

G. Planning conditions and/or legal agreements may be used to secure Management Plans where these are considered necessary to support nature conservation objectives.

~~F.~~H. Development proposals that help to reduce deficiencies in the population's access to nature will be considered favourably.

Explanation

~~10.10.~~10.12. Lewisham features a wide variety of ~~important~~ wildlife habitats ~~and sites of biodiversity value~~. These include~~e~~ing designated Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves and other areas ~~of~~ with habitat value such as parks and open spaces, ecological corridors, waterways, ~~and incidental~~ woodlands and other green space~~s~~. It is imperative that the wildlife value of these habitats ~~are~~ is protected ~~and~~ with appropriate~~ly managed so that their special biodiversity value is maintained and, ideally, improved over the long-term~~ maintenance regimes in place to maintain or enhance their wildlife value over the long-term. ~~Protection~~ This is important not only ~~to support~~for nature conservation ~~objectives~~ but also to maximise the ~~many other~~ multifunctional benefits associated with green infrastructure ~~including the management of flood risk, air and water quality, and climate change adaptation and mitigation~~. The State of Nature Report (2019)[130] makes clear the issues around the decline in the abundance and distribution of species in England and the UK. The Council will continue to work with stakeholders, including the Lewisham Biodiversity Partnership, to support nature conservation and fulfil its statutory obligations. The Environment Act 2021 sets out the framework for a national Nature Recovery Network which local authorities will support through the preparation of Local Nature Recovery Strategies (LNRS).

~~10.11.~~10.13. Growth and regeneration can be compatible with nature conservation objectives when development is considered in a holistic way. ~~In order to deliver sustainable communities we will require that n~~Considerations for nature conservation must therefore be ~~is~~ fully integrated into the ~~site selection, design and development process~~ design-led approach. ~~All d~~Development proposals ~~should~~ must seek to avoid harm to ~~protect habitats and species and further~~ and

[130] State of Nature Reports and State of Nature Summary for England. (2019). National Biodiversity Network.

Commented [NE506]: Respond to consultation – clarification to ensure ecologist is professionally chartered; and to seek that major developments engage with the Partnership for its local knowledge

Commented [NE507]: Re-phrased for clarity in G below

Commented [NE508]: Moved to criterion A above

Commented [NE509]: Repetition - this is covered more extensively in Policy GR1

Commented [NE510]: Respond to consultation – refer reports and issue of species decline

Commented [NE511]: To reflect provisions in Environment Act 2021

protect biodiversity as well as maximise opportunities to enhance ~~biodiversity~~ the value of habitats wherever possible. Applicants should refer the latest ~~local~~ Lewisham Biodiversity Action Plan, currently "~~A~~A Natural Renaissance for Lewisham" (2021), which sets out information on the vision and opportunities for the Borough ~~in this regard along with details on priority habitats and species~~.

Commented [NE512]: Moved to Para 10.14

~~10.12.1.1. Access to nature is a key component of living in an urban environment as it offers opportunities for respite, relaxation and education. Lewisham residents generally benefit from good access to green and open spaces. However in some parts of the Borough people do not enjoy easy access to green spaces with wildlife value. Localities where people are further than 1 kilometre walking distance from a publicly accessible site of Metropolitan or Borough level significance for nature conservation are defined by the London Plan as 'areas of deficiency'. Lewisham has 5 such areas covering 14 per cent of the Borough. The largest of these is located in the northwest, spreading from the River Thames in the north to Brockley in the south and the boundary with Southwark in the east. The other four areas, which are smaller and more discrete, are located around Deptford, Forest Hill, Lee and Lewisham town centre. Where new development comes forward opportunities should be taken to introduce additional biodiversity features across the Borough, and particularly in the areas of deficiency. Further information is set out in the Lewisham Re-Survey of Sites of Importance for Nature Conservation Study (2016). For development proposals, applicants should refer the deficiency maps developed by Greenspace Information for Greater London (GiGL). These are regularly updated taking into account the latest available information on nature sites, and use a method of accurately mapping areas of deficiency in public access based on actual walking distances along roads and paths.~~

10.14. A review of SINCs has been undertaken to inform the preparation of the Local Plan.[131] Lewisham contains Metropolitan, Borough and Local SINCS which are designated on the Policies Map. The level of protection afforded to SINCs is commensurate with their status and contribution to the wider ecological network. There are also priority habitats and species outside of SINCs which are given protection through this policy. The London Environment Strategy includes a comprehensive list of priority habitats and species that require particular consideration for planning decisions. The Lewisham Biodiversity Action Plan should also be referred for information.

Commented [NE513]: Respond to consultation – clarification as to what constitutes priority habitats and species

10.15. Lewisham does not contain any designated ~~European~~international or national nature conservation sites.[132] However there are 4 such sites within 15 kilometres of the Borough boundary which, given their proximity, have the potential to be impacted by development. These sites include the Lee Valley Special Protection

Commented [NE514]: Amended to take account of new technical evidence.

[131] Lewisham Open Space Review (2022) and Re-Survey of Sites of Importance for Nature Conservation (2016).

[132] International sites are designated under European Union Council Directive on the conservation of wild birds (79/409/ EEC) 1992, European Union Council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) 1992 and Ramsar Convention on wetlands of international importance.

Area (SPA) and the Richmond Park, Wimbledon Common and Epping Forest Special Areas of Conservation (SAC). Where a development proposal has the potential to impact on a ~~European~~ site by virtue of its location, nature of use or scale, then applicants should consult Natural England to confirm whether a Habitats Regulations Assessment is required. Development p~~P~~roposals ~~that are~~ likely to have significant adverse impacts on ~~European~~international or national sites will be ~~strongly resisted~~considered against relevant national planning policies and legislation.

~~10.13.~~10.16. ~~All~~ Development proposals ~~will be expected to~~must clearly identify biodiversity interests both within and in proximity to the site and assess impacts on them. They should ~~set out how~~demonstrate how the development will respond positively to these interests ~~whilst also demonstrating how harm will be avoided. In line with national policy, if significant harm resulting from a development cannot be avoided then mitigation measures will be required.~~ The NPPF sets out principles for determining planning applications where there is a potential or likely harm to biodiversity.[133] These are reflected both by the London Plan and this policy. Where it is clearly and convincingly demonstrated that harm to biodiversity cannot reasonably be avoided then appropriate mitigation measures will be required. ~~This could include~~with biodiversity offsetting ~~or other~~ used as a last resort. Mitigation measures ~~to~~should support implementation of Lewisham's Biodiversity Action Plan~~, which will be~~ and may be secured by way of planning obligations or planning conditions. ~~Applications~~ Proposals must clearly address why mitigation measures are necessary and any such mitigation must be agreed with the Council in advance of the commencement of development. ~~Mitigation measures should only be considered in exceptional circumstances. Proposals will be resisted where it cannot be suitably demonstrated that all reasonable efforts have been made to avoid harm to biodiversity interests at the outset of the site selection, design and development process.~~

Commented [NE515]: Included to aid policy implementation and to ensure consistency with NPPF and London Plan

Commented [NE516]: Amended to ensure consistency with NPPF and London Plan. Part of this captured in rephrased paragraph.

~~10.14.~~10.17. Proposals for major development and other development with a potential to have a direct or indirect impact on ~~the nature conservation value of sites, including designated sites with special biodiversity interests, will be required to~~ a SINC, LNR or other site with biodiversity interest must submit an up-to-date Ecological Assessment. This must be carried out by ~~A~~ a ~~suitably qualified~~chartered ecologist, such as one registered with the Chartered Institute of Ecology and Environmental Management (CIEMM) ~~will be expected to undertake this assessment~~. Surveys should be carried out during an optimal time of the year for observation. They must contain a sufficient amount of detail to identify and consider the relevant biodiversity interests and potential impacts on them. Applicants are expected to make surveys available to Greenspace Information for Greater London (GiGL) to assist in the collection of information in Lewisham and the region, and aid in the future delivery of the Lewisham Biodiversity Action Plan. Development proposals should consider biodiversity taking into account the relationship between different land uses within and in proximity to the site, along with amenity considerations such as lighting and shading.

Commented [NE517]: Respond to consultation – clarification added to support policy

Commented [NE518]: Respond to consultation – guidance to clarify

[133] National Planning Policy Framework. 2021. Paragraphs 80-83.

~~10.15.1.1. Lewisham does not contain any designated European nature conservation sites.[134] However there are 4 such sites within 15 kilometres of the Borough boundary which, given their proximity, have the potential to be impacted by development. These sites include the Lee Valley Special Protection Area (SPA) and the Richmond Park, Wimbledon Common and Epping Forest Special Areas of Conservation (SAC). Where a development proposal has the potential to impact on a European site by virtue of its location, nature of use or scale, then applicants should consult Natural England to confirm whether a Habitats Regulations Assessment is required. Proposals that are likely to have significant adverse impacts on European sites will be strongly resisted.~~

10.18. The Environment Act 2021 introduces provisions for Biodiversity Net Gain. The mandatory requirement for BNG on qualifying developments will apply in England and are to be brought into force through future amendments to the Town and Country Planning Act.[135] To ensure the alignment with the new legislative framework the Local Plan seeks that development proposals secure BNG. The BNG benchmark is a minimum 10 per cent increase in habitat value for wildlife compared with the pre-development baseline, calculated using an appropriate Biodiversity Metric.[136] The Lewisham Local Plan Viability Assessment (2022) indicates that this requirement will have a negligible impact on development viability.[137] Policy GR3.E will be used as a guide until such time further legislation and national policy take effect. BNG should normally be delivered on-site. However flexibility may be applied on a case-by-case basis where it is demonstrated that on-site provision is not feasible or off-site contributions will provide greater biodiversity benefits, for example, by contributing to the restoration or recovery of habitats within sites or areas identified in a LNRS or other similar document. Development proposals should refer to good practice guidance such as the British Standard BS 8683:2021 Process for designing and implementing Biodiversity Net Gain.

10.19. Development proposals may be required to be accompanied by a ~~site~~ Mmanagement Pplan. This will normally be secured by way of planning condition. The need for a Mmanagement Pplan will be established on a case-by-case basis taking into account the biodiversity interests on or in proximity to the site, as well as the nature and scale of development proposed. Management ~~p~~Plans can help to ensure that habitats and species are not harmed during the construction process, and that that site specific interventions and mitigation measures are fulfilling their objectives over the lifetime of the development, including through regular maintenance and monitoring. Applicants are strongly encouraged to liaise

Commented [NE519]: Re-ordered to align with policy sequencing

Commented [NE520]: Respond to consultation – supporting text linked to new policy on BNG in line with Environment Act 2021

~~[134] Designated under European Union Council Directive on the conservation of wild birds (79/409/EEC) 1992, European Union Council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) 1992 and Ramsar Convention on wetlands of international importance.~~

[135] The Government published a consultation on Biodiversity Net Gain Regulations and Implementation which ran from January to April 2022.

[136] The Government published the BNG 3.1 Metric (JP039) on 21 April 2022. This should be used as a guide for calculating BNG, or where appropriate, a future equivalent.

[137] The study tested BNG to be secured in perpetuity by applying an increase in build costs of 0.8 per cent, which is the upper end of the range indicated in the 2019 DEFRA report Biodiversity Net Gain and Local Nature Recovery Strategies Impact Assessment.

with local stakeholders, including the Lewisham Biodiversity Partnership, to discuss opportunities for support in this regard.

10.20. Access to nature is ~~a key component of living in an urban environment~~important as it offers opportunities for respite, relaxation and education. People in Lewisham ~~residents~~ generally benefit from good access to green and open spaces. However in some parts of the Borough people do not enjoy easy access to green spaces with wildlife value. Localities where people are further than 1 kilometre walking distance from a publicly accessible site of Metropolitan or Borough level ~~significance for nature conservation~~ SINC are defined by the London Plan as 'areas of deficiency'. Lewisham has 5 such areas covering 14 per cent of the Borough. The largest of these is located in the northwest, spreading from the River Thames in the north to Brockley in the south and the boundary with Southwark in the east. The other four areas, which are smaller and more discrete, are located around Deptford, Forest Hill, Lee and Lewisham town centre. Where new development comes forward opportunities should be taken to introduce additional biodiversity features across the Borough, and particularly in the areas of deficiency. Further information is set out in the Lewisham Re-Survey of Sites of Importance for Nature Conservation Study (2016). ~~For d~~Development proposals, ~~applicants~~ should refer the deficiency maps developed by Greenspace Information for Greater London (GiGL). These are regularly updated taking into account the latest available information on nature sites, and use a method of accurately mapping areas of deficiency in public access based on actual walking distances along roads and paths.

Commented [NE521]: Re-ordered to align with policy sequencing

Figure 10.7 Designated nature conservation sites

Figure 10.8 Areas deficient in access to nature

GR 4 Lewisham Links

Commented [NE522]: This is a repeat of the policy included in each of the Part 3 sub-area sections. To make the plan more concise, it has been deleted from the sub-area sections and included as this borough-wide policy. A cross-reference to the Lewisham Links will be retained in the Part 3 section, with further details set out on the specific 'links' within each of the respective sub-areas.

A. ~~Development proposals must contribute to facilitating the creation and enhancement of T~~the Council will promote and work with stakeholders to deliver the Lewisham Links~~,~~ a connected network of high quality walking routes and cycleways, public open spaces, green spaces, ~~and~~ nature sites and other visitor destinations across the Borough.

Commented [NE523]: Amended to aid effective implementation – it will not be appropriate for all development proposals to contribute to the Lewisham links. The specific circumstances in which they should are set out in GR4.B

B. Development proposals must provide for public realm enhancements to support the delivery of the Lewisham Links where they are ~~On sites~~ located adjacent to an existing or proposed route of the Lewisham Links, or where an existing or proposed route ~~runs through~~is located within the ~~a~~ site~~,~~. ~~development proposals must contribute to the delivery of a h~~High quality public realm~~, giving priority to movement by walking and cycling, in line~~ must be provided with reference to Policy QD3 (Public realm) and TR3 (Healthy streets and part of healthy neighbourhoods). ~~Proposals must deliver public realm improvements to support the delivery of the Lewisham Links, T~~the specific nature of public realm enhancements ~~which~~ will be considered on a ~~site~~case-by-~~site~~case basis~~,~~ and may include:
    a. New or enhanced footpaths or cycleways;

b. Road realignment;
c. Street crossings or other safety measures;
d. Cycle parking including space for cycle hire;
e. External lighting;
f. Landscaping;
g. Tree planting or other green infrastructure;
h. Drinking water fountains;
i. Public conveniences;
j. Way-finding signage.

C. To support the effective implementation of the Lewisham Links~~,~~ development proposals must have regard to the Council's Parks and Open Spaces Strategy.

10.21. This policy forms a key part of the Local Plan approach to delivering healthy, liveable and sustainable neighbourhoods. The Lewisham Links will help to ensure that people throughout the Borough are both encouraged and enabled to make more journeys by active travel modes, taking advantage of a high quality and well-connected network of walking routes and cycleways. The Lewisham Links will improve people's access to and between parks, open spaces, community facilities, and other key visitor destinations such as town centres and public transport nodes. The policy builds on the success of the North Lewisham Links Strategy. This sets out a programme of public realm improvements focused on priority walking routes and cycleways, or 'links', parts of which have now been delivered. The Strategy was developed in response to issues of severance caused by major roads and railways in Deptford and New Cross, as well as the need to secure new infrastructure to support growth and regeneration.

10.22. Development proposals must make provision for public realm enhancements where the site contains or is adjacent to an existing or proposed route of the Lewisham links. The specific nature of public realm enhancements will be considered on a case-by-case basis taking into account the nature of the development along with the site size, location and contribution required to support the effective functioning and quality of the Lewisham Links. Further details are set out in Part 3 of the Local Plan for each of the Borough's character areas. Whilst the Lewisham Links will connect a wide variety of visitor destinations there is a strong focus on connections to and between green spaces. Development proposals should therefore refer to the Lewisham Parks and Open Spaces Strategy.

Commented [NE524]: New supporting text - the Reg18 document did not have policy supporting text

GR 45 Urban greening and trees

A. Development proposals ~~should~~ must demonstrate how the design-led approach has been used to ~~incorporate high quality landscaping and optimise~~ maximise opportunities for urban greening ~~measures.~~ ~~,~~ This includ~~inges~~ ~~by~~ the ~~incorporating~~integration of high quality and species diverse landscaping, street trees, wildlife habitat, green roofs and walls~~,~~ and S~~s~~ustainable D~~d~~rainage S~~s~~ystems. ~~Urban~~ They must be designed with ~~greening should be fully integrated into the design-led approach with~~ consideration given to the site context ~~setting within~~ and the wider

landscape setting~~,~~ as well as the layout, design, construction and long-term management of buildings and spaces.

B. Development proposals must respond positively to landforms including by retaining or enhancing landscape features of historic, ecological and visual amenity value.

C. Major development proposals ~~will be expected to~~must increase green cover on site to achieve the recommended target Urban Greening Factor (UGF) in the ~~draft~~ London Plan, unless it can be suitably demonstrated that this is not ~~technically~~ feasible. The target UGF score is 0.4 for predominantly residential development and 0.3 for predominantly commercial development (excluding B2 and B8 uses). Existing green cover retained on-site will count towards the target score. Planning contributions may be sought where the target UGF is not achieved.

D. Development proposals should maximise the use of ~~living~~ green roofs and walls. Major development proposals will be expected to demonstrate that the feasibility of integrating these ~~features~~ measures has been fully investigated, and minor development proposals are strongly encouraged to incorporate them. ~~Living~~ Green roofs and walls will be supported where they are appropriately designed, installed and maintained. Development p~~P~~roposals should have regard to the latest industry good practice guidance to help ensure that green roofs and walls are designed to maximise environmental benefits and will function effectively over the lifetime of the development.

E. Development proposals ~~should~~ must seek to retain existing trees~~,~~ as well as the associated habitat with regard for the urban forest~~,~~, with reference to Policy GR3 (Biodiversity and access to nature). ~~and~~ They should also maximise opportunities for additional tree planting ~~and green infrastructure,~~ particularly ~~trees~~ in ~~characteristically~~ urbanised ~~settings~~ locations such as streets and town centres. ~~All~~ Development proposals must ~~suitably~~ demonstrate that ~~tree retention along with tree and other green infrastructure planting have been considered as part of the design-led approach and the development~~ they will:

   a. Provide for the sensitive integration of all trees whilst ensuring any new or replacement on-site provision is of a high ecological quality (including appropriate species, stem girth and life expectancy) and ~~positively~~ contributes positively to the microclimate;
   b. Protect veteran trees and ancient woodland;
   c. Retain trees of quality and associated habitat, wherever possible, with appropriate arrangements to secure their protection throughout demolition, construction, and external works, to the occupation stage of development;
   d. Avoid the loss of, and mitigate against adverse impacts on, trees of significant ecological, amenity and historical value;
   e. Ensure building foundations are sufficient to be climate change resilient in proximity to trees; and
   f. Ensure adequate replacement tree planting where the retention of trees is not reasonably practical, with replacement provision that meets the requirements of (a) above.

Commented [NE525]: Deleted - Feasibility implies technical feasibility

Commented [NE526]: This is captured in GR5.A – this policy focuses specifically on trees

Commented [NE527]: Repetition – design led approach set out in QD1 and covered also in A above

F. Development p~~P~~roposals ~~involving~~ should avoid, and the Council will refuse, the removal of protected trees (i.e. those covered by a Tree Protection Order and trees within Conservation Areas)~~, or those~~ and developments that w~~ould~~ill have a detrimental impact on the health of protected trees and visual amenity provided by them ~~protected trees, will be strongly resisted~~. The Council may identify and seek to protect trees that are of a significant amenity, heritage, ecological, or other value through the development management process.

G. Major development proposals, and where appropriate other development proposals, will be required to submit a Landscape Design Strategy and Arboriculture Survey to demonstrate that landscaping and other urban greening measures are appropriate to the site, can be implemented effectively and will be suitably managed over the lifetime of the development.

Explanation

~~10.16.~~10.23. Urban greening is a term used to describe a wide range of measures that can be incorporated into buildings and spaces to increase green cover in the Borough. These measures include~~,~~ but are not limited to~~,~~: tree planting, naturalised biodiverse landscaping, green roofs and walls, hedges, climbers, plants for pollinators, de-paving, rain gardens and sustainable drainage systems using natural or semi-natural features. Urban greening ~~offers a number of~~can provide multifunctional benefits ~~enviro~~nmental benefits including for biodiversity enhancement and climate change resilience, particularly by helping to reduce the urban heat island effect and flood risk. Greening can also enhance the character of areas and improve the visual amenity of spaces and buildings, and provide green corridors for connecting wildlife habitats, which is particularly important in a highly urbanised setting like Lewisham. such as for climate change resilience, amenity including air quality, nature conservation and local character.

Commented [NE528]: Amended to make more concise

~~10.17.~~10.24. The ~~draft~~ London Plan ~~introduces~~ sets the Urban Greening Factor (UGF) requirement for major developments ~~proposals~~. The UGF is a model used to provide a baseline for the amount of green cover that development will be expected to achieve, taking into account various site development factors. We will apply the recommended ~~interim~~ UGF factors for major residential and commercial development as ~~advocated~~ set by the ~~draft~~ London Plan. Existing green cover retained on site as part of a development proposal will count towards the target UGF score. Relevant major development proposals should meet and seek to exceed the target score. Some flexibility may be applied on a case-by-case basis where it is suitably demonstrated that the target cannot be achieved for reasons of technical feasibility or financial viability, in which case proposals should show that they have been designed to achieve the highest score possible. Development proposals should refer the Mayor's Urban Greening Factor SPG.[138]

~~10.18.~~10.25. ~~Living~~ Green roofs and walls will normally be required as part of the package of urban greening measures delivered on sites. They will be supported

[138] Urban Greening Factor Guidance. Greater London Authority. The draft guidance was published in September 2021.

where they appropriately respond to local character and comply with other Local Plan policies. This includes consideration for the historic environment, where development must preserve the significance of heritage assets. Green roof assembly should as a minimum consist of a root repellent system, a drainage system, a filtering layer, a growing medium and plants, and be installed on a waterproof membrane on an applicable roof. Buildings should be designed to have sufficient structural capacity and integrity to resist all loads for soil, moistures, plants, rain and wind uplift, safely, effectively and permanently. It is important that living roofs are included in the early planning and design stage and supported by a qualified and accredited installer. Green ~~and living~~ roofs should be designed in with photovoltaic panels. Development p~~P~~roposals must demonstrate how the installation and maintenance will comply with the latest industry standards, currently ~~in~~ the Green Roof Code of Best Practice for the UK 2014, or any national equivalent.

Trees

~~10.19.~~10.26. Trees and the urban forest are an integral part of the Borough's network of green infrastructure and have many beneficial functions. In addition to enhancing local character and amenity, including air quality, they provide extensive areas of habitat for wildlife~~, which is particularly important in an urbanised setting like Lewisham~~. Trees also have an important role in climate change adaptation and mitigation. For example, they reduce strain on drainage systems by absorbing rainfall and enable positive microclimatic effects through cover and shade. Recognising the significant environmental value of trees the ~~draft~~ London Plan sets out the Mayor's aspirations to increase tree cover in London by 10 per cent by 2050, which this policy provides support for. The London Environment Strategy (2018) and London Urban Forest Plan (2020) provide further details on tree canopy cover and the urban forest.

~~10.20.~~10.27. Trees should be considered at the early stages of the ~~planning and~~ design-led ~~process~~ approach in order to maximise their many beneficial effects ~~including on ecology, local character and amenity~~. Where development proposals include elements of public realm ~~we will require~~ tree provision ~~that is~~must be commensurate with the nature and scale of development. ~~All~~ Development proposals will be expected to retain and protect existing trees, ensuring they can be sustained over the long-term. This includes trees of quality which are Category A and B trees as defined by British Standard BS5837:2012 and also Category C & U trees within biodiverse habitat areas. New development should not result in an unacceptable harm to or loss of trees, particularly where these are protected by a Tree Preservation Order, are located in a Conservation Area or make a significant contribution to local ecology, public amenity and local character, including historic character. Whilst acknowledging the Council has limited control in terms of the protection of trees in private residential gardens, it will seek to promote the multifunctional benefits of trees and prevent the loss of trees wherever possible.

~~10.21.~~10.28. Where it can be suitably demonstrated that the loss of a tree is acceptable, such as when the tree is considered dangerous to the public or where its removal is necessary to secure site redevelopment consistent with the spatial

Commented [NE529]: Respond to consultation – signpost key strategies to justify policy and support implementation

Commented [NE530]: Benefits addressed in paragraph above

Commented [NE531]: Respond to consultation – reflect situation in terms of private gardens

strategy, then replacement planting will be required. ~~We will prioritise~~Priority will be given to on-site replacement unless it can be demonstrated there are exceptional circumstances ~~that~~ which necessitate off-site provision, in which case planning contributions may be sought. When a financial obligation is required for replacement trees the value may be calculated using the Capital Asset Value for Amenity Trees (CAVAT) or a similar methodology. Financial contributions will be expected to include on-going maintenance costs where trees are planted in the public realm.

~~10.22.~~10.29. New or replacement species should be selected to avoid the risk of decline or death arising from increases in non-native pests and diseases. Where new trees are to be planted, the species type should be chosen using the 'Right Place Right Tree' approach as advocated by the Mayor's London Tree and Woodland Framework. When purchasing trees, they should be responsibly sourced ideally from a domestic nursery with UK grown or imported trees appropriately quarantined for a minimum of one year within the UK before sale. This ensures plant health and non-infection by foreign pests or disease.

~~10.23.~~10.30. The Council makes Tree Preservation Orders (TPOs) to protect specific trees or particular areas, groups or woodland with amenity value from deliberate damage and destruction. If a tree is subject to a TPO, consent will be required before any work that might affect the tree can be carried out. It is a criminal offence to prune, fell or damage protected trees without appropriate consent and the Council will enforce breaches in accordance with relevant policy and legislation.

Landscape design strategy

~~10.24.~~10.31. A site's landscape and its relationship to existing and future development, and immediate surrounds, should be considered comprehensively from the start of the design-led approach. Proposals should have regard to the existing character of the site including landform and features of the natural landscape (such as trees on or in proximity to the site). Where existing landscapes contribute to local distinctiveness, development should respond positively to those features. Applicants are encouraged to refer Lewisham's Characterisation Study as a useful starting point for understanding landscape features in the Borough.

~~10.25.~~10.32. A Landscape Design Strategy must be included with all major development proposals and proposals for sites where a Tree Preservation Order is in place. Other applications may also be required to provide this information having regard to individual site circumstances and the biodiversity interests involved. The Landscape Design Strategy ~~will be expected to~~must include an assessment of the relevant site features and nature conservation interests, details of work required to ensure the successful implementation of the strategy, and a M~~m~~anagement P~~p~~lan. The M~~m~~anagement P~~p~~lan should address maintenance of hard and soft landscaping features over the lifetime of the development, with specific details covering a minimum 5-year period from occupation. Considerations may include: planting plans with species, frequency of maintenance operations such as weeding, irrigation and the use of hydration bags for trees, checking stakes and ties, plant condition, mowing times for long grass sward areas,

materials and minimising hard surfacing, details of building subsidence and other liabilities such as climate change resilient foundations within zone of influence of trees, permeable surfacing and SUDs drainage, wildlife connectivity such as hedges for boundary treatment and hedgehog gaps when fencing is used, underground services and infrastructure in relation to root protection areas of existing trees and new tree planting areas, security and access arrangements to landscaped areas.

~~10.26.~~10.33. Arboriculture Surveys should be undertaken separately and help to inform the Landscape Design Strategy, where one is required. Surveys should provide details of existing species (with information on spread, roots and position of trees), details of trees affected by the development (including measures to be taken to protect retained trees during the construction process), and other plans for the positive management of trees. Plans and documents will be expected to be submitted in accordance with the British Standards 5837 (2012).

GR ~~5~~6 Food growing

A. Allotments and community gardens will be protected in order to support sustainable food growing locally and to enhance opportunities for leisure, social interaction and education.

B. Major development proposals for housing and proposals for community facilities are encouraged to include provision of space for community gardening and food growing. Where such existing provision exists and a site is to be redeveloped, this should be retained or re-provided.

Explanation

~~10.27.~~10.34. Allotments and community gardens form part of the Borough's network of green infrastructure. They are an important resource for local food production, support biodiversity and promote sustainable communities, for example, by providing opportunities for recreation and social interaction. For children and young people food growing offers opportunities for education outside of the traditional classroom setting. Allotments and community gardens are invaluable to those who do not have access to a private garden and therefore help to promote more inclusive communities. Whilst recognising that private gardens provide opportunities for food growing, this policy does not apply to gardens as these are dealt with separately in the Local Plan.

Commented [NE532]: Respond to consultation – clarification point to aid policy implementation

~~10.28.~~10.35. All major development proposals for residential and community uses are encouraged to incorporate provision for food growing. This should be considered early in the design-led approach so that provision is of a high quality ~~standard~~, suitably meets the needs of the intended end users, and is accessible to people of all ages and abilities. Consideration should also be given to the integration of ancillary facilities, such as storage space for equipment and connections to water sources, which are vital to ensuring that provision is convenient and ~~useable~~functional.

Commented [NE533]: Deleted as there are no relevant standards – the focus on high quality provision is retained

GR ~~6~~7 Geodiversity

C. The Council will protect the Borough's geodiversity assets and seek to promote understanding of them by:

a. Designating a Regionally Important Geological Site at Beckenham Place Park;

~~a.~~b. Designating ~~a~~ Locally Important Geological Sites at Old Gravel Pit, Blackheath and Buckthorne Cutting, Crofton Park; and

~~b.~~c. Ensuring development proposals make a positive contribution to the protection and enhancement of designated geodiversity sites and other sites of geological interest.

Explanation

~~10.29.~~10.36. Geodiversity involves the many components that make up the landscape and its character. This includes physical features, such as rocks and soils, as well as the processes that help shape landforms such as erosion and sedimentation. An awareness of geodiversity helps us to understand our environment and how we can better adapt to it. As geodiversity is a natural resource that cannot be replaced or recreated it is important that geological interests are appropriately managed.

10.37. The Local Plan designates 3 geological sites of strategic importance which are set out in the Policies Map. The designations have been i~~I~~nformed by research prepared by the Natural England and the London Geodiversity Partnership[139], which supports the London Plan and its associated Supplementary Planning Guidance. ~~identifies scope for the designation of a~~ The designated sites comprise:

- **Regionally Important Geological Site (RIGS) at Beckenham Place Park**~~, which is designated in the Local Plan takes forward~~. This RIGS consists of a small portion of land near the park's entrance which is notable for its natural exposures of clay and sands, known as the Harwich Foundation. The exposure benefits from its location at either side of a Green Chain walk within the park where there is good opportunity for public access.
- **Locally Important Geological Site (LIGS) at Old Gravel Pit, Blackheath**. This LIGS is located at the edge of an open space and features sand and gravel, also from the Harwich Foundation, which are visible despite being overgrown by grass.
- **Locally Important Geological Site at Buckthorne Cutting, Crofton Park**. This LIGS is located at a railway cutting and features clay, silt and sand from the London Clay Formation. The site forms part of a Local Nature Reserve where there are opportunities for public access.

[139] London's Foundations: Protecting the Geodiversity of the Capital Supplementary Planning Guidance (2012) and Revised Site Assessments for London's Foundations (2021). Greater London Authority.

Commented [NE534]: Respond to public consultation – request to consider locally important geological sites; one additional site designated as informed by latest London Plan evidence / supplementary planning guidance

Commented [NE535]: Respond to consultation – provide flexibility for consideration of sites which are not designated at this time

Commented [NE536]: New designations informed by updated technical evidence – London Foundations reports. Buckthorne Cutting also noted during public consultation.

10.38. We will protect the geodiversity interests at ~~this~~ these sites and promote appreciation and understanding of them, such as by supporting way finding signs, interpretative boards and public access improvements where appropriate. The London's Foundations SPG and associated research should be referred for further information on site characteristics and promotional opportunities.

~~10.30.~~10.39. There are other sites within the Borough that have been identified as sites of geological interest but which have not been designated as RIGS or LIGS in the Local Plan. These include, for example, the New Cross Cutting Nature Reserve and at Ladywell. The Council will continue to work with stakeholders including the London Geodiversity Partnership to explore opportunities to support the protection and management of such sites.

11 Sustainable design and infrastructure

~~What you've told us~~

~~The council should by lead example in responding to the climate emergency.~~

~~More should be done to tackle climate change by:~~

- ~~Making buildings more environmentally friendly, for example, by using less energy.~~
- ~~Creating decentralised energy networks, such as in Deptford and Bell Green~~
- ~~Protecting green and open spaces, and promoting urban greening~~
- ~~Encouraging people to use cars less~~

~~There are also concerns about:~~

- ~~Poor air quality~~
- ~~Fly tipping~~
- ~~Flood risk, especially in residential areas~~

~~What we've learned~~

~~Carbon emissions falling but remain a concern~~

- ~~The latest Government data shows emissions decreased by 38% from 2005 to 2017.~~
- ~~Housing is the largest source of carbon emissions in Lewisham, mainly from domestic gas. Transport is the second largest.~~

~~Different types of flood risk~~

- ~~River related flooding is the main form of flood risk in Lewisham~~
- ~~Large parts of the Borough lie within a Critical Drainage Area, where there is a greater risk of surface water flooding incidents~~

~~Poor air quality in some areas~~

- ~~Some parts of Lewisham exceed the EU limits for the pollutant Nitrogen Dioxide.~~
- ~~Levels for the pollutant PM10 (Particular Matter) are within the EU limits but exceed the World Health Organisation guidelines.~~

Low levels of recycling

- Recycling rates have been improving but Lewisham is behind the rest of London.

Main issues

Climate emergency

The council declared a climate emergency and aims to be carbon neutral by 2030 - but there are technical and financial challenges to achieve this.

Population growth

Lewisham's population is forecast to rise by roughly 20% by 2040. Carbon emissions will increase unless action is taken.

Flood risk

Climate change is expected to increase flood risk - the location and design of development will be important to ensure the safety of people and properties.

Air quality

Supporting growth and development whilst improving air quality remains a key challenge.

Waste management

Lewisham must play its part in helping London to manage waste more responsibly.

We're proposing to…

Help reduce carbon emissions

- Ensure new developments meet the London Plan standards for sustainable design and construction.
- Allow for the limited use of carbon offset payments, where carbon reduction targets cannot be met on site. Funds will be used on local green projects.
- Prepare an Energy Masterplan to support the creation and use of decentralised energy networks.

Reduce flood risk

- Restore and revitalise Lewisham's river corridors
- Update our borough wide flood risk study and use this to inform planning decisions
- Work with partners to maintain and deliver new infrastructure, including flood defences and the Thames Tideway Tunnel.

Improve air quality

- Encourage and enable people to use cars less, or not at all
- Require new developments to be 'air quality neutral'

Reduce and effectively manage waste

- Promote the 'circular economy' – reduce waste by prioritising the re-use and recycling of materials
- Work with other boroughs to manage Lewisham's share of waste, and safeguard existing facilities.

~~**We've also considered...**~~

- ~~Requiring developments to meet carbon targets on-site in every case (e.g. not allowing flexibility for offset payments).~~
-

SD 1 Responding to the climate emergency

A. Lewisham Council has declared a climate emergency. In response to this a strategic and coordinated approach will be taken to ensure that the Borough contributes significantly to mitigating climate change and is made more resilient to its environmental, social and economic impacts. Local actions are both necessary and integral to supporting wider regional and national actions to address global climate change.

B. To help ensure that the Borough develops in a way that is environmentally sustainable ~~the Council will~~all development proposals must:
   a. Help Lewisham to become a net zero-carbon Borough as part of a net zero-carbon London;
   b. ~~Designate, P~~protect and ~~seek~~ maximise opportunities to enhance ~~a~~ the network of green and open spaces, as well as improve linkages to and between them;
   c. ~~Designate~~ Conserve sites of importance for biodiversity, protect habitats and species within the local ecological network, and ~~seek~~ deliver biodiversity net gain~~s in biodiversity wherever possible including through urban greening~~;
   d. Implement measures to reduce flood risk and ensure resilience against the impact of flooding ~~across the Borough~~, and seek to improve the quality of water bodies;
   e. ~~Ensure that new development does N~~not adversely ~~affect~~ impact on the amenity of the local population and habitats, ~~including by mitigating impacts on and improving air quality in the Borough~~;
   f. Help London to achieve ~~net~~ waste net self-sufficiency by ~~promoting the~~ applying the waste hierarchy and circular economy principles ~~in order to increase the re-use and recycling of materials and achieve reductions in waste going for disposal~~.

C. A plan, manage and monitor ~~process~~ approach will be used to support the successful transition to a net zero-carbon Borough. This ~~process~~ approach will help to ensure that the Local Plan reflects ~~the most~~ current national and regional planning policy requirements and standards for carbon management, along with the Council's latest technical ~~evidence~~ studies and strategies to deliver low and zero carbon outcomes.

Explanation

1.1. Lewisham Council is one of the first local authorities in the UK to declare a climate emergency.[140] This declaration has been made recognising that a changing

[140] London Borough of Lewisham. Meeting of Council on 27 February 2019. Motion 2 declared to be unanimously carried.

Commented [NE537]: Not required for Regulation 19 document

Commented [NE538]: Respond to consultation – the Local Plan should reflect the requirement to deliver net gains in biodiversity in line with legislation

Commented [NE539]: Amended to reflect that development should reduce flood risk both within and outside of the borough

Commented [NE540]: Consultation – stronger wording requested

Commented [NE541]: Repetition – this is covered in the standalone policy on air quality and the policy on amenity and agent of change, which this criterion links to

Commented [NE542]: Amended to align with changes to Policy SD12 Reducing and sustainably managing waste

climate will have severe and enduring social, economic and environmental implications, and that tackling climate change is an issue of inequality as the greatest impact will be on the most vulnerable and those least able to protect themselves. A strategic and coordinated approach to addressing climate change is necessary. Collaborative action will need to be pursued by authorities at different levels and across administrative boundaries – in London, the UK and beyond – in order to realise significant positive gains in carbon reduction and to limit global warming.[141] At the same time it is imperative that Lewisham's neighbourhoods and communities are made more resilient to the on-going effects of climate change. We are committed to accelerating action on climate change understanding that locally specific responses are urgently needed to help address this global issue in a meaningful way, and that local authorities will need to show more leadership in this regard. The Local Plan will work together with the Council's Climate Emergency Action Plan (2020), which sets out a roadmap for taking action on climate change in Lewisham.

Commented [NE543]: Factual update and informative

1.2. 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. These policies cut across a number of topic areas, many of which are included in the following section, and reflect the complexity of matters that must be taken into account when planning positively for climate change resilience.

1.3. The ~~draft~~ London Plan sets a strategic objective for London to become a net zero-carbon city by 2050, which we are committed to helping achieve. A plan, manage and monitor ~~process~~ approach will be used to support the successful transition to a net zero-carbon Borough. We will regularly assess performance against our strategic objectives through the Authority Monitoring Report process. This will help to inform any necessary changes to ~~our~~ the policy approaches set out in this Local Plan. In addition, we will take the opportunity to regularly review policies to ensure they reflect the latest requirements and standards at the regional and national levels, also taking account of the Council's latest technical evidence and strategies. ~~For example, we have committed to preparing a future Climate Change Action Plan and to investigate options and feasibility of becoming a net zero-carbon Borough by 2030. Through the Local Plan review process we will seek to align any future corporate strategies and actions with the local planning framework.~~

Commented [NE544]: Deleted as the Action Plan has now been adopted, and this has informed the Local Plan

SD 2 Sustainable design and retrofitting

A. Development proposals ~~will be required to~~must submit a Sustainable Design Statement. This should clearly set out how the design-led approach has been used to ensure the integration of sustainable design principles ~~have been integrated into the design-led approach~~, including consideration of the construction and operation

[141] The United Nations Framework Convention on Climate Change (FCCC), Decision 1/CP.21, more commonly referred to as the Paris Agreement, seeks to limit global warming to 1.5 degrees Celsius from pre-industrial levels.

phases of development. The statement should be proportionate to the nature and scale of development proposed with a sufficient level of detail to demonstrate that the relevant policy requirements have been satisfied. For major development proposals the Sustainable Design Statement should refer and complement other detailed statements including for:

a. Landscape design and urban greening;
b. Nature conservation;
c. Energy use and heat risk management;
d. Air quality;
e. Flood risk and water management;
f. Ground conditions; and
g. Waste reduction and the circular economy.

B. Proposals for new self-contained major and minor residential development ~~will be required to~~should seek to achieve the BRE Home Quality Mark.

C. Proposals for new non-residential development of 500 square metres gross floorspace or more, including mixed-use development, ~~will be required to~~must achieve an 'Excellent' rating under the BREEAM New Construction (Non-Domestic Buildings) 2018 scheme, or future equivalent, unless it can be demonstrated that this is not feasible.

Sustainable retrofitting

D. The use of sustainable retrofitting measures will be encouraged and supported in order to improve the energy efficiency and environmental performance of housing and other buildings, as well as the quality of living spaces for their occupants. Retrofitting measures should be integrated using the 'whole house' or 'whole building' approach, which requires an understanding of how a building has been constructed, its context and all the factors affecting energy use.

~~B.~~E. Development p~~P~~roposals for major residential domestic refurbishment ~~will be required to~~must achieve a certified 'Excellent' rating under the BREEAM Domestic Refurbishment 2014 scheme, or future equivalent, unless it can be demonstrated that this is not feasible.

~~C.~~A. ~~Proposals for new non-residential development of 500 square metres gross floorspace or more, including mixed-use development, will be required to achieve an 'Excellent' rating under the BREEAM New Construction (Non-Domestic Buildings) 2018 scheme, or future equivalent.~~

~~D.~~F. Development proposals for major non-residential refurbishment, including mixed-use development, will be required to achieve a certified 'Excellent' rating under the BREEAM Non-Domestic Refurbishment scheme, or future equivalent, unless it can be demonstrated that this is not feasible.

~~E.~~G. Where planning consent is required, s~~S~~ustainable retrofitting measures to existing buildings and other development will only be supported where ~~they comply~~

Commented [NE545]: Respond to consultation – amended in response to Written Ministerial statement regarding housing standards

Commented [NE546]: This criterion has be re-ordered within the policy

Commented [NE547]: Respond to consultation – Standard may not always be possible due to technical feasibility. This was recognised in the supporting text but needs to be reflected in policy as well

Commented [NE548]: Respond to consultation and Member feedback – new policy and standalone sub-section on sustainable retrofitting to give this matter more prominence and direction in the plan

Commented [NE549]: Respond to consultation – Standard may not always be possible due to technical feasibility. This was recognised in the supporting text but needs to be reflected in policy as well

Commented [NE550]: Moved above.

Commented [NE551]: Respond to consultation – Standard may not always be possible due to technical feasibility. This was recognised in the supporting text but needs to be reflected in policy as well

~~with~~ other Local Plan policies are satisfied, including on the historic environment and heritage assets.

Explanation

1.4. A significant step change in the design quality and environmental performance of buildings and spaces is needed to achieve the Local Plan's strategic objectives, particularly for climate change adaptation and mitigation. Sustainable design principles should therefore be considered early in the planning and design stages and be fully integrated throughout the development process, including the construction and occupation stages. The principles cut across a number of topic areas within the Local Plan but are most predominant in the policies included in this section. All applicants ~~will be expected to~~must submit a Sustainable Design Statement explaining how the proposed development positively engages with these principles. ~~The statement will be a key consideration in the determination of planning applications. It should therefore address the relevant policy requirements whilst taking into account the nature and scale of development.~~ The statement should clearly identify the need for any site-specific mitigation and demonstrate that adequate measures will be delivered and effectively implemented.

1.5. The Home Quality Mark is a nationally recognised standard for new housing that has been established by the Building Research Establishment. It provides an indication of the expected health and well-being benefits and environmental footprint of new residential development. All proposals for new self-contained residential development should seek to achieve the Home Quality Mark, as demonstrated through an independent assessment by a qualified assessor. Proposals are strongly recommended to achieve a minimum 3 star rating and for developers and/or agents to make the Home Quality Mark assessment publicly available, for example, as part of any promotional material. Published ratings will also assist the Council with monitoring implementation of the Local Plan policies.

1.6. Proposals for new non-residential development (including refurbishments) and non-self-contained housing will be expected to meet the Building Research Establishment Environmental Assessment Methodology (BREEAM) 'Excellent' standard. BREEAM provides a nationally recognised sustainable design standard for different types of development and covers a wide range of sustainability considerations. Applications for qualifying development are encouraged to submit BREEAM pre-assessments as part of the Sustainable Design Statement, identifying the credits to be targeted and measures to achieve these. All proposals will be considered having regard to individual site circumstances and the nature of development proposed. Planning contributions, such as carbon offsetting, may be sought where ~~development proposals~~ where it is suitably demonstrated that the policy requirements cannot be sufficiently satisfied such as for reasons of technical feasibility.

1.7. For commercial and industrial uses applicants must justify that the required 'Excellent' rating cannot be reasonably delivered on-site, including through evidence of a BREEAM pre-assessment. It is recognised that for some types of developments the BREEAM requirements may pose particular challenges, for example, where there is no defined end-user and/or the Council has agreed that

Commented [NE552]: Respond to consultation – request that this point is embedded in policy and not only in supporting text

Commented [NE553]: Repetition – this repeats the point in criterion A above

buildings ~~do not need to be fully fitted~~require a certain level of fit out. However, our expectation is that shell only and shell and core proposals, where appropriate, should be capable of meeting the BREEAM credits~~.~~ taking into account the flexibility provided by the BREEAM methodology.

~~1.7.~~1.8. Where the Home Quality Mark or BREEAM assessments are submitted, these must be prepared by a suitably qualified and independent assessor.

Sustainable retrofitting

1.9. Housing is the single largest contributor of carbon emissions in Lewisham, with more than 50 per cent of emissions coming from energy used within homes.[142] Sustainable retrofitting measures can help to improve the energy performance of existing buildings and minimise carbon emissions produced in the Borough. Even small-scale development, such as householder schemes, can incorporate measures that improve the environmental performance of buildings. This may include internal roof, floor and wall insulation, energy efficient fixtures, or urban greening. ~~We will therefore broadly support sustainable retrofitting recognising the positive contribution this can play locally.~~

1.10. The most appropriate type of sustainable retrofitting measures will vary depending on the type of building, its context and location, including character setting. A 'whole house' or 'whole building' approach is one that looks at the energy performance of a building in a comprehensive and integrated way. It helps to ensure that improvements are carried out in an organised, sensible order, with installations and refit measures complementing rather than working against each other. For instance, some standard retrofitting measures can cause damage to traditional or historic buildings, causing problems with trapped moisture which may reduce energy efficiency and bring risks to the health of occupants. In addition, the budget available to householders and other developers will impact on the type and amount of retrofitting works they are able to carry out. The whole house approach can be useful to inform the most appropriate and cost-effective measures, along with phasing of works delivered over a longer period. Householders and other developers are encouraged to refer good practice guidance when considering retrofitting, such as the Climate Emergency Retrofit Guide published by the London Energy Transformation Initiative (LETI).

~~1.8.~~1.11. It is important ~~that all such proposals~~ retrofitting is carried out in a way that preserves or enhances the significance of heritage assets and their setting (such as Listed Buildings and buildings within Conservation Areas) in line with other Local Plan policies. Where heritage assets are concerned, applicants are encouraged to refer the latest Historic England guidance for further information.

SD 3 Minimising greenhouse gas emissions

A. ~~Development proposals should~~To help Lewisham to become a net zero-carbon Borough ~~by~~ development proposals must be designed to ~~reducing~~ reduce greenhouse gas emissions in ~~the~~ operation ~~stage~~ and ~~minimising~~ minimise energy

[142] Lewisham's carbon emissions baseline data. Drawn from the Department of Business Energy and Industrial Strategy (June 2019).

Commented [NE554]: Respond to consultation – ensure assessments are carried out by a suitably qualified and independent assessor

Commented [NE555]: Factual update and added to strengthen policy justification

Commented [NE556]: Repetition – support is set out in criterion D above

Commented [NE557]: Respond to consultation - Additional supporting text for retrofit policy

demand (annual and peak) in accordance with the ~~draft~~ London Plan energy hierarchy~~, as follows:~~.

~~a. Be lean: use less energy and manage demand during operation.~~

~~b. Be clean: exploit local energy resources and supply energy efficiently and cleanly.~~

~~c. Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.~~

~~d. Be seen: monitor, verify and report on energy performance.~~

Commented [NE558]: Removed to make more concise – the energy hierarchy is set out in the London Plan, which the policy refers

B. Major development proposals ~~will be required to demonstrate how the~~must be net zero-carbon ~~target will be met by applying the energy hierarchy, in line with draft London Plan policy SI2 (Minimising greenhouse gas emissions)~~ and:

a. Meet the minimum on-site reduction of carbon emissions required by the London Plan;

b. Calculate and minimise emissions from any part of the development that are not covered by Building Regulations (e.g. unregulated emissions).

Commented [NE559]: Respond to consultation and align with London Plan approach – further clarification on how zero carbon will be calculated, including consideration of non-regulated emissions

~~. Details of the approach used to meet the target should be clearly set out in an Energy Strategy submitted as part of the Sustainable Design Statement.~~

~~B. Major development proposals will be required to achieve a minimum on-site reduction of at least 35 per cent (beyond the baseline of Part L) of the current Building Regulations.[143] They should also calculate and minimise emissions from any other part of the development that are not covered by Building Regulations (i.e. unregulated emissions).~~

Commented [NE560]: Re-phrased in B above.

C. ~~In exceptional circumstances,~~ W~~w~~here it is clearly demonstrated that the net zero-carbon target cannot be ~~fully~~ achieved on-site, development proposals ~~will be required to~~must make contributions to ~~address~~ meet the identified shortfall through:

a. A cash-in-lieu contribution to Lewisham's carbon offset fund; and/or

b. Appropriate off-site measures where these can be demonstrated to be deliverable.

D. Major development proposals are encouraged to assess embodied carbon emissions and maximise opportunities to reduce these emissions.

Commented [NE561]: Respond to consultation – request for policy on embodied carbon

E. Details of the approach used to meet the net zero-carbon target ~~should~~must be clearly set out in an Energy Strategy submitted as part of the Sustainable Design Statement.

Commented [NE562]: Re-ordered within the policy.

F. Development proposals should minimise energy demand of the building(s) in-use by seeking to achieve the London Energy Transformation Initiative (LETI) targets for projected Energy Use Intensity (EUI), as set out in Table 11.1.

~~[143] Building Regulations 2013. If these are updated during the plan period, the policy threshold will be reviewed in accordance with the London Plan review process.~~

Table 11.1 Targets for Energy Use Intensity by Building Type[144]

Building type	Reduce energy consumption to:	Reduce space heating demand to:
Minor residential	35 kWh/m²/year	15 kWh/m²/year
Major residential	35 kWh/m²/year	
Commercial office	55 kWh/m²/year	
Education	65 kWh/m²/year	

Explanation

1.12. The ~~draft~~ London Plan sets a strategic objective for London to become a zero-carbon city by 2050. In order ~~for the Borough~~ to contribute to meeting these objectives ~~in becoming~~ and help Lewisham become a net zero-carbon ~~itself~~borough, it will be necessary for new development to maximise energy efficiency and reduce carbon emissions. A zero-carbon target for major residential developments has been in place for London (and Lewisham) since October 2016 and ~~will apply~~this target now also applies to major non-residential developments ~~from 2019~~. To meet the zero-carbon target, the London Plan requires major developments to provide an on-site reduction of at least 35 per cent beyond the baseline of ~~part~~ Part L of the Building Regulations 2013 ~~is required~~. Should the Building Regulations change ~~over the plan period~~, then the policy threshold will be subject to review and updating through the London Plan review process.

~~1.9.~~1.13. Embodied carbon refers to the greenhouse gas emissions arising from the manufacturing, transportation, installation, maintenance and disposal of building materials. This is distinguished from operational carbon which refers to emissions arising from building energy consumption. Operational carbon is dealt with by the London Plan and Policies SD3.A-C above. To help ensure that the carbon emissions are fully accounted and minimised during the development process, applicants are encouraged to assess and address embodied emissions through the design-led approach. Good practice guidance on this element of low carbon design should be referred, such as that prepared by the London Energy Transformation Initiative (LETI).

Commented [NE563]: Respond to consultation – additional supporting text for new policy on embodied carbon

1.14. ~~We will seek to ensure that all~~ All new development proposals ~~are~~ must be designed having regard to the London Plan energy hierarchy~~giving priority to on-site carbon reductions. Consideration may be given to o~~. New development is expected to be net-zero carbon and where this is not feasible, it should get as close as possible to zero-carbon on-site. Off-site contributions~~ should be used as a last resort and will only be acceptable~~ where it ~~can be~~is clearly ~~and suitably~~ demonstrated that carbon targets cannot be fully achieved on-site. These contributions ~~will be required to~~must address any identified shortfall and will be

Commented [NE564]: Respond to consultation – the plan should emphasise that offset should only be used as a last resort

[144] All targets are set out in kilowatt hour (kWh) per metre square (m²) per year by Gross Internal Area (GIA) and excluding renewable energy contribution. The LETI Climate Emergency Design Guide should be referred for further information.

secured by planning obligations. Further details on carbon offset payments are set out in the Council's Planning Obligations SPD. Carbon costing will be established in accordance with the London Plan and its associated guidance.

~~1.10.~~1.15. The LETI Climate Change Design Guide sets out a roadmap to zero carbon development. It recommends the use of an Energy Use Intensity (EUI) metric. The EUI is an annual measure of the total energy consumed in a building. It is a good indicator for building performance as the metric is solely dependent on how the building performs in-use; rather than carbon emissions, which also reflect the carbon intensity of the grid. EUI can be estimated at the design stage and easily monitored in-use as energy bills are based on kilowatt hour (kWh) of energy used by the building. EUI includes all of the energy consumed in the building such as regulated energy (heating, hot water, cooling, ventilation, and lighting) and unregulated energy (plug loads and equipment e.g. kitchen white goods, ICT/AV equipment). It does not include charging of electric vehicles. Development proposals should make reasonable efforts to reduce energy consumption of buildings in-use, including by reducing space heating demand. Details should be set out in the Energy Statement, where appropriate. The EUI targets in Table 11.1 are non-binding and should be used as a guide to help future-proof development, until such time EUI targets may be set out in higher level policy or Building Regulations.

SD 4 Energy infrastructure

A. Development proposals must be designed in response to a site-specific assessment of the most effective and efficient energy supply options, taking into account the Council's Eenergy Mmasterplan~~s where appropriate~~. For large-scale schemes such as major developments, applicants ~~are encouraged to~~should engage at an early stage with the relevant energy suppliers and bodies to establish future energy and infrastructure requirements necessary to support the development.

Commented [NE565]: Amended to refer the Council's Energy Masterplan, which identifies key opportunities for district heating in the borough

B. ~~Proposals for new-build d~~Development proposals ~~, and wherever possible proposals for conversions or alterations to existing buildings,~~ should prioritise connection to decentralised heat networks. Major development proposals ~~will be expected to~~must provide a F~~f~~easibility A~~a~~ssessment for connecting to, and if possible extending or interconnecting, existing or planned future heat networks located on or in proximity to the~~ir~~ site. Proposals for m~~M~~inor new-build development, conversions and building alterations ~~proposals should~~ must demonstrate that they have investigated and ~~optimise~~ maximised opportunities to connect to existing heat networks.

Commented [NE566]: Amended for clarity and to aid effective policy implementation

C. Where a decentralised heat network is planned or likely to be delivered in the future, ~~All major and minor d~~development proposals should be designed ~~for~~ to enable a cost-effective ~~future~~ connection to it, ~~a heat network,~~ having regard to Heat Network Priority Areas of the London Heat Map and ~~other local area opportunities, including those identified in~~ energy masterplans.

D. Major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system. The heat source must be selected in accordance with the ~~draft~~ London Plan heating hierarchy~~, as follows:~~

a. ~~Connect to local existing of planned heat networks.~~
b. ~~Use zero-emission or local secondary heat sources.~~
c. ~~Use low-emission combined heat and power (CHP) where there is a case for CHP to deliver an area wide heat network.~~
~~Use ultra-low NOx gas boilers.~~

Commented [NE567]: Removed to make more concise – the heating hierarchy is set out in the London Plan, which the policy refers

E. Development proposals for CHP and ultra-low NOx gas boiler communal or district heating systems will only be acceptable where it is demonstrated that ~~these sources are necessary, with proposals having fully investigated~~ other options in the heating hierarchy have been fully investigated and are not feasible, and there will be no adverse impact on air quality. ~~Proposals will be considered having regard to Policy SD6 (Improving air quality) and relevant London Plan policies.~~ Air Quality Assessments ~~will be required to~~must include full dispersion modelling to assess impacts on nearby receptors.

F. Where CHP and ultra-low NOx gas boiler systems are acceptable in line with (E) above, proposals should be designed in a way that enables, and does not preclude, the decarbonisation of the site wide communal network in the future.

G. Major housing development proposals ~~will be required to~~must, and all minor housing proposals should, submit an estimated heat unit supply price (£/kWh), annual standing charges and projected annual maintenance costs for their proposed Energy Strategy. This should include information detailing any assumptions the calculations are based on. Where it can be suitably demonstrated that other Local Plan policy requirements can be satisfied without the submission of this information at the planning application stage, the Council will seek to secure this through planning obligations or through Building Control arrangements.

Commented [NE568]: Respond to consultation – flexibility should be applied for timing of submission of this information, provided policies can be met

H. Where site-wide communal and district heating systems are operational, heat and energy service providers ~~will be~~are encouraged to enter into customer charters with domestic and small business customers.

Figure 11.1: Lewisham heat map – Tier 1 and 2 heat loads

Explanation

~~1.11.~~1.16. In order ~~to achieve the strategic objective~~ for Lewisham to become a net zero-carbon Borough it will be necessary to change the way in which energy is used and supplied ~~locally~~. This means shifting from a reliance on natural gas as the main energy source to a wider range of low and zero-carbon and renewable sources. Decentralised energy covers a range of technologies that do not rely directly on the electricity transmission network or gas grid. It is expected to play an increasingly important role in London's energy supply. Decentralised energy is vital to energy security and helping the Capital become more energy self-sufficient. It also offers opportunities ~~in respect of~~for carbon reduction as a more sustainable energy source. ~~In responding to the climate emergency we are committed to promoting decentralised energy locally and will seek to exploit~~

~~opportunities for network investment, particularly as new development comes forward.~~

~~1.12.~~1.17. Development proposals should prioritise connection to decentralised heat networks wherever technically feasible. The London Plan identifies Heat Network Priority Areas where there are opportunities to facilitate decentralised energy network development. These areas feature heat densities that are sufficient for heat networks to provide an economically competitive option for supplying energy. They include parts of Lewisham and areas in adjoining Boroughs. Applicants are encouraged to refer the London Heat Map for the latest information on heat demands, supplies and networks across London along with the extent of Heat Network Priority Areas. ~~The Heat Map is accessible online and updated regularly.~~

~~1.13.~~1.18. The Council has ~~and will continue to~~ prepared ~~a suite of~~ studies ~~investigating the potential for~~to support decentralised energy network development in the Borough~~, drawing on the latest available information~~. This includes the Lewisham Energy Masterplan (2020) and Strategic Borough-wide Decarbonisation Study (2020)~~, Lewisham Heat Network Feasibility Study (2016), New Cross Heat Network Route Feasibility Assessment (2015) and Lewisham Town Centre Low Carbon and Decentralised Energy Report (2010). Building on this evidence we will prepare an Energy Masterplan to provide an updated position on the most feasible options for network development~~. All development proposals ~~will be expected to~~should refer to the Council's latest ~~local~~ energy masterplans and studies ~~evidence for guidance in considering energy sources, and~~ to ensure that opportunities for decentralised energy are maximised.

~~1.14.~~1.19. All proposals for major residential and commercial development ~~will be expected to~~must submit a F~~f~~easibility A~~a~~ssessment to fully evaluate connecting to an existing or planned future heat network ~~where it is located on or in proximity to the site~~. The ~~feasibility~~ assessment should evaluate technical and financial viability and consider a range of factors included but not restricted to: capability of the network to supply part of the heat demand, location of development and distance to network pipes, physical barriers and other developments in the areas that may also be required to connect. For the purpose of this policy, a planned future network is one that is considered by the Council likely to be operational within 3 years of the grant of planning permission. All proposals for minor new-build development, extensions and alterations ~~proposals~~ should also seek to secure connection to heat networks. Major development p~~P~~roposals ~~will be expected to~~must include an Energy Statement as part of the Sustainable Design Statement. This should provide sufficient information to demonstrate that feasibility has been fully investigated, having regard to the latest London Plan S~~s~~upplementary P~~p~~lanning G~~g~~uidance. Consideration of feasibility should take into account potential connections to networks both within and outside the Borough.

~~1.15.~~1.20. In areas where there are no existing or planned district heat networks proposals should be designed for future connection to a heat network. The latest London Heat Manual should be referred for further guidance. Designs should entail a wet heating system, single point of connection into heating system,

Commented [NE569]: Removed to make more concise – this point is captured in the policy

Commented [NE570]: Factual update to refer latest technical evidence

Commented [NE571]: Consultation – consideration should be given to networks beyond borough boundary

additional plant room space for thermal substation and low temperature heating systems (60 degrees Celsius or lower) to support low temperature heat networks This will help to ensure that connection is made more financially viable and technically feasible in future years. ~~Proposals should have regard to the spatial strategy for the Borough as this provides an indication of the areas that are expected to accommodate significant growth and where network development is likely to be delivered over the long-term.~~

Commented [NE572]: Deleted as policy now refers to the Council's Energy Masterplan

~~1.16.~~1.21. ~~Consistent with the draft London Plan, a~~All major development proposals within Heat Network Priority Areas ~~and elsewhere~~ should have a communal heating system served from a single energy centre, with the heat source for the system selected in accordance with the heating hierarchy. Proposals will be expected to demonstrate that the feasibility and viability of implementing options at the higher end of the hierarchy have been fully investigated before considering the use of CHP or gas boiler systems. We will ~~seek to resist~~refuse proposals that rely on CHP or gas boiler systems where their use is not sufficiently justified. Where the use of an ultra-low NOx is justified, this should achieve an emissions rating of <40 mg/kWh. Furthermore, all such proposals must not result in any adverse impact on air quality, in line with other ~~Policy SD 6 (Improving Air Quality) and relevant London Plan~~ Local Plan policies.

~~1.17.~~1.22. Where development proposals including CHP and ultra-low NOx gas boiler systems are acceptable in principle, they should be designed in a way that enables, and does not preclude, the decarbonisation of the site wide communal network in the future. Proposals should include information on the opportunities and potential measures in this respect. This could include, for example, details describing how the development could accommodate the plant space required for such decentralised energy networks, and how the individual dwellings have been designed to ~~allow for and accommodate~~enable future connections.

~~1.18.~~1.23. Heat networks and communal heating systems must be designed, constructed, commissioned and operated in accordance with CIBSE/ABE Code of Practice CP1 ~~.2: Heat Networks Code of Practice,~~ or ~~the latest version~~equivalent. All developments that are required to connect to an existing or planned heat network in accordance with policy must ~~explicitly~~ demonstrate in the~~ir~~ Energy Strategy how the scheme will comply with the above Code of Practice.

~~1.19.~~1.24. Where households and businesses are reliant on decentralised heat networks it is important that there are clear expectations for service standards. We will encourage the use of customer charters or publically available right of challenge in a fair and independent way. Such charters and ombudsman are useful in establishing clarity on matters such as system maintenance and end-user pricing, and can be particularly helpful to more vulnerable uses (for example, those in or at risk of fuel poverty or start-up and micro-businesses). All developments that are required to connect to an existing or planned heat network in accordance with this policy should ensure that the future network operator will be registered with the Heat Trust Scheme (Heat Customer Protection Ltd.) The scheme sets out common customer service standards and protection

requirements that are comparative to regulated utilities, drawing on legislation and good practice guidance.

SD 5 Managing heat risk

A. Development proposals ~~should~~ must minimise ~~internal heat gain and~~ the adverse impacts on the urban heat island through the design~~, layout and orientation~~ of buildings and spaces, as well through the use of materials and urban greening measures~~, having particular regard to Policy GR4 (Urban greening and trees)~~.

B. All new development ~~should~~ must be designed to reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the London Plan cooling hierarchy.~~, as follows:~~ Development proposals will only be supported where there is sufficient evidence to demonstrate that priority has been given to the implementation of feasible measures at the higher level of the ~~cooling~~ hierarchy ~~through the design-led approach~~.

~~a. Minimise internal heat generation through energy efficient design.~~
~~b. Reduce the amount of heat entering a building through orientation, shading, albedo, fenestration, insulation, and the provision of green roofs and walls.~~
~~c. Manage the heat within the building through exposed internal thermal mass and high ceilings;~~
~~d. Provide passive ventilation.~~
~~e. Provide mechanical ventilation.~~
~~Provide active cooling systems.~~

Commented [NE573]: Removed to make more concise – the cooling hierarchy is set out in the London Plan, which the policy refers

~~B.~~A. ~~Development proposals will only be supported where there is sufficient evidence to demonstrate that priority has been given to the implementation of feasible measures at the higher level of the cooling hierarchy through the design-led approach.~~

Commented [NE574]: This point has been moved to B above.

C. Major development proposals ~~will be required to~~must submit an Energy Statement to demonstrate how they will meet the requirements of (~~B~~A) and (~~C~~B) above.

D. Major development proposals incorporating ~~amenity space and~~ public realm, including amenity and open space, should be designed to create a comfortable environment~~, including~~ in the public realm through the provision of shade and other passive cooling measures, giving priority to urban greening measures.

Commented [NE575]: Respond to consultation – priority should be given to urban greening measures

Explanation

Commented [NE576]: Policy supporting text amended throughout to make more concise.

~~11.20. In recent years London has experienced higher than historic average temperatures along with more severe hot weather events. Heat risk is becoming an increasingly important issue, particularly in the context of a growing population and global climate change. All new development should therefore be designed to manage heat risk.~~

~~11.21.~~11.25. In recent years London has experienced higher than historic average temperatures along with more severe hot weather events. Heat risk is becoming an increasingly important issue, particularly in the context of a growing population

and global climate change. The urban heat island is experienced in areas where there is extensive urban development. Buildings and spaces in these areas absorb and retain heat during the day and night. In a heavily urbanised place like London, this process results in the city being several degrees warmer than its surrounding areas. The urban heat island poses a significant health risk to vulnerable groups, such as older people or those with certain health conditions, particularly during peak summer months. All new development ~~will~~ must therefore use the design-led approach to ~~be expected~~ minimise internal heat gain and manage heat risk ~~through the design, layout and orientation of buildings and spaces, along with the use of materials~~ in line with ~~. Proposals should incorporate measures in line with the Mayor's~~ the London Plan cooling hierarchy~~, recognising that Lewisham should play a role in positively supporting regional planning objectives. This will help to ensure that buildings are better equipped to manage their cooling needs in energy efficient ways over their lifetime.~~

~~1.22.~~1.26. Applicants should refer the latest Chartered Institution of Building Services Engineers (CIBSE) guidance on assessing and mitigating overheating risk in new developments, including TM59 for domestic development and TM52 for non-domestic development. The London Mayor's Energy Planning Guidance should also be referred. Proposals should undertake dynamic thermal modelling to ensure that development does not overheat, and this should address temperatures likely to be experienced over the lifetime of the development, having regard to CIBSE guidance and datasets included in document TM49.

~~1.23.~~1.27. Severe hot weather events can discourage physical and outdoor activity. Development proposals must ~~will~~ therefore ~~be expected to~~ be designed to ~~promote~~ provide for a comfortable environment~~.~~ ~~by helping to ensure that~~ This may include ~~opportunities for respite, such as~~ shaded areas~~, are~~ integrated into the public realm ~~and that and other~~ or measures to ensure indoor amenity spaces are cool and well-ventilated. ~~Where necessary, a~~Planning contributions for~~to~~ cooling measures ~~for spaces and streets~~ outside the ~~development~~site boundary may be ~~appropriate~~necessary to mitigate heat risk generated by the development, for example, to make the public realm more comfortable ~~and attractive for movement by walking and cycling. This is consistent with~~, in line with the Healthy Streets ~~a~~Approach ~~advocated by the Local Plan, in line with the draft London Plan~~.

~~1.24.~~1.28. All major development proposals ~~will be expected to~~must submit an Energy Statement as part of the Sustainable Design Statement. This should clearly set out how measures at the higher end of the cooling hierarchy have been considered and given priority through the design-led approach. We will ~~seek to resist~~ refuse proposals that use measures at the lower levels of the hierarchy unless there is evidence to demonstrate that this is necessary, for example, for reasons of technical feasibility.

~~1.25.~~1.29. ~~Whilst all development proposals will be expected to give consideration to managing heat risk, i~~It is recognised that the feasibility of measures ~~will be commensurate with~~in the cooling hierarchy will often depend on the nature and scale of development. Minor developments~~, and in particular~~ such as householder extensions~~,~~ may have limited scope to implement ~~some~~ measures

at the higher end of the hierarchy. ~~However all minor development proposals are encouraged to investigate potential measures and incorporate these wherever possible.~~ The urban heat island effect can be mitigated through the cumulative positive impacts of smaller developments. For this reason, the loss of established soft landscape features without replacement will be resisted for all proposals and new soft landscaping will be encouraged wherever possible.

SD 6 Improving air quality

A. Poor a~~A~~ir quality is a significant public health issue in Lewisham. All new development ~~should~~ must use the design-led approach and integrate on-site measures to ~~contribute to improving~~ improve air quality ~~within the Borough~~ and ~~reducing~~ prevent or minimise the population's exposure to poor air quality, having regard to~~, in line with draft London Plan Policy SI1 (Improving air quality) and by supporting the achievement of objectives in~~ Lewisham's ~~latest~~ Air Quality Management Plan.

B. ~~All New major d~~Development proposals must: ~~be at least air quality neutral and all development proposals must demonstrate that they will not~~:

   a. Seek to improve air quality and be at least air quality neutral;

   ~~a.~~b. Not l~~L~~ead to a further deterioration of existing poor air quality;

   ~~b.~~c. Not c~~C~~reate any new areas that exceed air quality limits, or ~~compromise the achievement of~~delay the date at which compliance ~~with targets~~will be achieved in areas that are currently in exceedance of ~~the~~ legal limits; and

   ~~c.~~d. Not c~~C~~reate ~~an~~ unacceptable risk of high levels of exposure to poor air quality.

~~C. Development proposals should be designed to prevent or minimise exposure to existing air pollution and implement measures to help improve air quality. Particular consideration should be given to the siting, layout and design of proposals located in Air Quality Management Areas and Air Quality Focus Areas, as well as for developments that are likely to be used regularly by large numbers of people (including public open space) and vulnerable groups, such as children and older people.~~

~~D.~~C. Air Quality Assessments ~~will be required to~~must be submitted with proposals for:

   a. Major development;
   b. Minor development within an Air Quality Management Area and/or Air Quality Focus Area if the development is likely to adversely impact on air quality or introduce new sensitive receptors to exposure to an area of existing poor air quality; and
   c. Community infrastructure ~~(including health, education and leisure facilities),~~ or other uses (including public open space) that are likely to be used ~~regularly~~ by large numbers of particularly vulnerable groups, such as older people and children and young people.

Commented [NE577]: Amended to emphasise the use of design-led approach to address air quality

Commented [NE578]: Respond to consultation - amended to align with London Plan including policy which requires all developments (not just majors) to be at least air-quality neutral

Commented [NE579]: Amended to make more concise and avoid repetition – the requirements have been brought into QD7 Amenity and agent of change, along with criterion A above and C below.

Commented [NE580]: Amended to bring in criteria from B above, which has been deleted and incorporated elsewhere

~~E.~~D. Development proposals must demonstrate how they will comply with the Non-Road Mobile Machinery Low Emission Zone requirements and reduce emissions from the demolition and construction of buildings following the Mayor's 'The Control of Dust and Emissions for Construction and Demolition' SPG ~~(2014)~~, or subsequent guidance.

~~F.~~E. Development proposals will be considered having regard to their individual and cumulative impacts on air quality. Proposals that do not meet the requirements of (~~B~~A) and (~~C~~B) above will be ~~resisted~~ refused unless it can be suitably demonstrated that ~~appropriate measures are implemented to ensure~~ adverse impacts can be mitigated to an acceptable level. Mitigation should be provided on-site. In exceptional circumstances~~,~~ where it is demonstrated that ~~this~~ on-site mitigation is not feasible~~impracticable or inappropriate~~, off-site provision may be acceptable where equivalent air quality benefits will be delivered in the ~~local~~ area affected by the development.

Figure 11.2: Air Quality Management Areas (AQMAs) and Air Quality Focus Areas (AQFAs)

Explanation

~~1.26.~~1.30. 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.[145] This policy supports the London Mayor's commitment to making air quality in London the best of any major world city. It also helps 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).

~~1.27. Alongside London Plan, including draft policy SI1 (Improving air quality), the implementation of this and other Local Plan policies on sustainable transport, green infrastructure, energy, sustainable design and waste management will together contribute towards the objective of improving air quality across the Borough.~~

1.31. There are currently 6 AQMAs in Lewisham with two major AQMAs. 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. 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~~. An assessment of air quality in Lewisham has shown a decreasing trend in the levels of two pollutants, nitrogen

Commented [NE581]: Amended for clarity and to aid policy implementation

Commented [NE582]: Removed to make more concise and avoid repetition covered elsewhere in plan

[145] Lewisham Joint Strategic Needs Assessment, A Picture of Lewisham. 2019.

dioxide (NO^2) and particulate matter (PM) in recent years. However more needs to be done to meet the guidelines set out by the World Health Organisation. In Lewisham, the highest concentrations of nitrogen/nitric oxides (NOx), NO^2 and PM which breach the legal limits are found on the busiest main roads. However, pollution levels quickly reduce with distance from the pollution source.[146]

~~1.28.~~1.32. In addition to AQMAs there are also 10 Air Quality Focus Areas (AQFAs) in the Borough.~~:~~ ~~T~~these ~~areas~~ are locations that have been identified as having high levels of pollution and human exposure. The current AQMAs and the Mayor's 'London Datastore' maintains an up-to-date list of AQFAs across the Capital, taking account of changing circumstances and latest available evidence. AQMAs are identified in Figure 11.2 and may be subject to periodic review and updating. Development proposals within AQFAs must submit a desktop Health Impact Assessment in line with Policy DM5 (Health Impact Assessments)

~~1.29.~~1.33. New ~~major~~ development ~~will be required to~~must be at least 'air quality neutral' and not ~~development shall~~ lead to a further deterioration of existing poor air quality, in line with the London Plan. Development proposals ~~should~~ must also reduce the population's exposure to poor air quality, particularly for those groups who are most vulnerable to its impacts such as children and young people and older people. New development, as a minimum, must not cause new exceedances of legal air quality standards or compromise achievement of compliance in those areas currently in exceedance, as currently provided by the Air Quality Standards Regulations 2010. The Healthy Streets Approach should be used wherever possible to help address poor air quality. Development proposals will be considered taking into account individual and cumulative impacts of development in an area, consistent with national policy.

~~1.30.~~1.34. Applicants should refer to ~~refer relevant~~the London Plan ~~supplementary planning~~ guidance for further information on the Air Quality Neutral and Air Quality Positive standards. The Council's latest Air Quality Action Plan and associated monitoring reports should also be referred, along with our Good Practice Guide: Control of Pollution and Noise from Demolition and Construction. Sites. In addition, development proposals on or adjacent to waterways should refer to the Port of London Authority's Air Quality Strategy.

~~1.31. Proposals will be considered taking into account the individual and cumulative impacts of development in an area, consistent with national policy. We will have particular regard to proposals for major development and those located within AQMAs and AQFAs, recognising the existing localised levels of poor air quality and potential impacts of larger schemes. Applicants should take particular care where development is likely to be used regularly by vulnerable groups. This includes proposals community facilities and specialist housing. Exposure to poor air quality can be avoided through the site selection process and/or through site~~

[146] Draft Lewisham Air Quality Management Action Plan 2022-2027 (2021). Lewisham AQMA declared in 2001 for exceedances in annual mean NO^2 and 24-hour mean PM^{10} concentrations and Crofton Park and Honor Oak Park AQMA declared in 2013 for exceedances in annual mean NO^2 concentrations. It is also important that development proposals consider $PM^{2.5}$ which are smaller particles than PM^{10}, in line with the Mayor of London target to align with the WHO guidelines.

Commented [NE583]: Respond to consultation – The footnote below is provided to clarify that consideration must be given to both PM10 and PM2.5

Commented [NE584]: Factual updates with information from draft Lewisham Air Quality Management Action Plan.

Commented [NE585]: Respond to consultation – a new policy has been included on Health Impact Assessments to respond to concerns about air quality other factors impacting public health – See Part 4 Policy DM6

Commented [NE586]: Respond to consultation – the Healthy Streets Approach should be signposted in the air quality policy

Commented [NE587]: Amended to align with London Plan and NPPF

Commented [NE588]: Respond to consultation – PLA Air Quality Strategy should be referred

~~layout and design solutions. New developments will be expected to contribute to actively reducing air pollution in Air Quality Focus Areas, supporting measures to improve air quality.~~

~~1.32.~~11.35. Air Quality Assessments (AQAs) will be required for ~~certain types of~~ qualifying development set out in the policy and~~. Assessments~~ must address impacts arising during the construction, occupation and operation~~al~~ phases of development. They should also consider the wider cumulative impacts on air quality arising from development within the locality.

~~1.33.~~11.36. Where an AQA indicates a potential negative impact on air quality, appropriate measures that will minimise or offset impacts from the development should be identified and implemented on-site. Planning permission will be refused unless appropriate mitigation measures are adopted to reduce the impact to acceptable levels. In practice, it may not always be possible to achieve Air Quality Neutral standards or to acceptably minimise impacts using on-site measures alone. If on-site measures are insufficient to make the development acceptable, the AQA should demonstrate that it is possible to include measures in the local area with equivalent air quality benefits. Mitigation measures may be secured either by planning condition or legal agreement, where appropriate.

~~1.34.~~11.37. An AQA with full dispersion modelling is required for all proposed Biomass and CHP boilers and this must demonstrate that the impact on nearby receptors is minimal.

~~1.35.~~11.38. Development that involves significant demolition, construction or earthworks will be required to assess the risk of impacts according to the Institute of Air Quality Management Dust Guidance and the London Mayor's SPG on 'The Control of dust and Emissions during Construction and Demolition'. Mitigation measures should be included in the Construction Management Plan. All medium and high risk sites should include real time construction dust monitoring, in line with the London Plan guidance.

SD 7 ~~Reducing~~ Minimising and managing flood risk

A. The Council will w~~W~~ork~~ing~~ in partnership with stakeholders to implement the ~~flood risk management actions in the~~ Thames Estuary 2100 Plan. To minimise and manage flood risk development proposals must:~~; and~~

~~seek to reduce flood risk and ensure resilience against the impact of flooding by:~~

a. ~~Using~~ Apply a sequential approach to the location of new development to avoid~~, where possible,~~ flood risk to the population and property whilst taking account of the long-term impact of climate change.~~;~~

~~Directing new development to those areas of the Borough that are at the lowest risk of flooding, having regard to Lewisham's Strategic Flood Risk Assessment (SFRA), by applying the Sequential and Exception Tests in accordance with national planning policy;~~

b. ~~Requiring that all new development does n~~Not increase flood risk ~~in the Borough,~~ and reduce~~s~~ the risk of flooding from all sources;

c. Make space for water by providing an undeveloped setback from rivers and other watercourses; ~~and~~

Commented [NE589]: Removed to make more concise – these points are addressed in policy above and London Plan.

Commented [NE590]: The Local Plan water management and flood risk policies have been restructured throughout for legibility.

In addition, these policies have been strengthened where possible in response to consultation feedback (including from the Environment Agency) and findings of the Local Plan Integrated Impact Assessment. The IIA identified that flood risk was a key sustainability issue in terms of the spatial strategy, given that a significant amount of the land available for development was located within flood zones, and this would need to be appropriately managed in line with national policy.

Commented [NE591]: Moved from SD9 Lewisham's waterways

Commented [NE592]: Repetition – the sequential approach is referred in A.a above. This is well established by the NPPF which sets out further details in this respect

Commented [NE593]: Respond to consultation-addition requested by Environment Agency

d. Where appropriate, ~~provide~~carry out a condition survey of ~~existing~~ flood defence and other watercourse infrastructure and if necessary, provide for maintenance, repairs or remediation to secure ~~the~~ its functional integrity ~~of this infrastructure~~ over the lifetime of the development. This includes raising the Thames Tidal Defences in accordance with the TE2100 plan, in the case of riparian ownership of land; and

~~b.~~e. Be ~~is~~ designed to remain safe and operational under flood conditions.~~;~~

~~c.a. Working in partnership with stakeholders to implement the flood risk management actions in the Thames Estuary 2100 Plan; and~~

~~d. Seeking that new development maximises opportunities for river restoration, in line with Lewisham's River Corridors Improvement Plan SPD~~

B. A site specific Flood Risk Assessment (FRA) will be required for all development proposals within Flood Zone 2, 3a and 3b, all major development in Flood Zone 1, and elsewhere in the Borough where development may be at risk of other sources of flooding. The ~~assessment~~ FRA must provide sufficient ~~evidence~~ information for the Council to assess whether the requirements of the Sequential and Exception Tests have been satisfied~~.~~. ~~and will be expected to~~The FRA must:

a. Be proportionate with the degree of flood risk posed both to and by the development;
b. Take account of all potential sources of flooding both on and off-site;
c. Make an appropriate allowance for the hazard posed by climate change over the lifetime of the development~~, informed by the latest Government guidance~~; and
d. Have regard to the recommendations of the latest Lewisham SFRA and the Lewisham Local Flood Risk Management Strategy.

C. Where development proposals satisfy the Sequential and Exception Tests ~~the site layout and~~they must be designed ~~of development~~to should ensure that:

a. The most vulnerable land uses are directed to areas of the site that are at lowest risk of flooding;
b. There is no net loss of flood storage capacity and adequate provision is made for flood storage and compensation, with priority given to on-site provision;
c. There is no detrimental impact on the natural function of the floodplain and floodwater flow routes across the site; and
~~d.~~ Appropriate mitigation measures are incorporated to address any residual flood risk, including safe access and egress for all likely users of the development.~~; and~~

~~e. Flood risk is not increased elsewhere.~~

D. Development proposals ~~will be required to~~must provide a site-specific Flood Emergency Response Plan to manage actual and/or residual flood risk, where appropriate.

Figure 11.3: Flood Zones and Critical Drainage Areas

Explanation

Commented [NE594]: Moved from SD9 Lewisham's waterways

Commented [NE595]: Respond to consultation – addition requested by Environment Agency

Commented [NE596]: Moved to A above

Commented [NE597]: Repetition – this point is covered in SD9 Lewisham's waterways

Commented [NE598]: This is set out and explained in the supporting text and supported by the NPPF

Commented [NE599]: Repetition – covered in criterion A.b above

~~1.36.~~11.39. 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. The Honor Oak Stream (Chudleigh Ditch), another tributary of the Ravensbourne, also passes through the Borough. 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.

11.40. The Thames Estuary 2100 Plan sets out ~~recommendations and~~ actions that are needed to manage flood risk in the Thames Estuary~~,~~ taking account of the long-term impacts of climate change. It promotes a multi-agency approach ~~to implementation of priority strategic and local actions with partners~~ including Government bodies, local authorities and developers. ~~The TE 2100 Plan sets~~ Lewisham ~~Borough~~is within 'Action Zone 2 – Central London' of the Plan, where~~.~~ ~~The Local Plan both supports and helps to set a framework for positively managing development consistent with the TE2100 Plan.~~requirements 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 of 16 metres for tidal rivers and 8 metres for fluvial rivers, or other distance agreed by the Council and Environment Agency. Riparian landowners have a responsibility to maintain and raise tidal flood defences and follow the latest good practice guidance, such as the Estuary Edges guidance.

Commented [NE600]: Supporting text Moved from SD9

Commented [NE601]: Respond to consultation - Addition supporting text and clarification at request of Environment Agency. Estuary Edges guidance included at request of Port of London Authority.

~~1.37.~~1.41. ~~It is important that~~New development ~~does~~ must not increase flood risk to people and~~,~~ properties ~~and infrastructure~~. ~~and that all~~ Development proposals should proactively seek to minimise and mitigate flood risk ~~wherever possible. This is particularly important in locations that are known to be at risk of flooding. Applicants will be expected to~~ by considering risk from all sources ~~of flooding~~ using appropriate and up-to-date information. Early engagement with relevant stakeholders, including the Council as Lead Local Flood Authority, the Environment Agency (EA), ~~and~~ Thames Water Utilities and Port of London Authority is strongly advised.

Commented [NE602]: Respond to consultation – Port of London Authority should be referred for advice

~~1.38.~~1.42. 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 Level 1 SFRA (2019) maps the Borough into flood zones according to the probability of flooding occurring, discounting the presence of any flood defences and alleviation measures. Flood Zone 3b is the functional floodplain, where water has to flow or be stored in times of flood. ~~The flood zone maps have been prepared using the latest available data from the Environment Agency however~~ Aapplicants should consult the EA for site specific flood model outputs to better understand flood risk, and to establish whether the flood zones ~~have~~ in the SFRA have ~~since~~ been updated. Lewisham's Surface Water

Commented [NE603]: Respond to consultation – additional clarification points included

Management Plan (SWMP) provides ~~additional~~ information on other sources of flood risk. ~~All proposals will be assessed against the latest available information.~~

~~11.39.~~11.43. In line with the NPPF ~~and its associated guidance we will apply~~ a sequential approach must be used ~~to the location of new development. This is in order~~ to ensure that new development is directed to those areas of the Borough, and locations within sites, that are at the lowest risk of flooding. We will consider the appropriateness of ~~proposed uses~~development ~~within the different flood zones~~ having regard to the Sequential and Exception Tests, and ~~informed by Flood Risk Assessments~~FRAs submitted by applicants. ~~Assessments are required to~~FRAs must take into account the long-term hazard posed ~~to development~~ by climate change. The latest standing advice on climate change allowances published by the EA should be referred and form the basis of assessments. ~~Furthermore, t~~The Lewisham Level 2 SFRA ~~(2019) sets out evidence of~~also provides ~~the flood characteristics in the Borough~~site specific information (including flood depth, velocity, rates of inundation and duration of flooding) ~~that should also be considered~~. The NPPF states that the Exception Test may be satisfied where development provides wider sustainability benefits to the community 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.

Commented [NE604]: Respond to consultation – the Local Plan should provide details of what might constitute 'wider sustainability benefits'

~~11.40.~~11.44. As part of the preparation of the Local Plan the Council has undertaken a Sequential Test to assist in identifying those areas of the Borough that are suitable for strategic sites. Allocated sites that have passed the Sequential Test will not need to apply this test again, unless the proposed use is not consistent with the site allocation.

~~11.41.~~11.45. Where the Sequential and Exception Tests are satisfied ~~we will seek that~~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).

~~11.42.~~11.46. Development p~~P~~roposals ~~will need to~~must be accompanied by a Flood Emergency Response Plan to ensure safe access and egress from actual and/or residual flooding, where appropriate. This measure is necessary to ensure that building occupiers can be made aware of the responses to various types and scale of flood threat, evacuation logistics, evacuation routes and other safety arrangements in terms of dry access, egress and refuge. Examples of such developments can include proposals with water compatible uses, alterations to existing buildings and building floor levels that have been raised, but where there is remaining flood risk under the 0.1% AEP event.

~~11.43.~~~~11.1.~~ ~~The Thames Estuary 2100 Plan sets out recommendations and actions that are needed to manage flood risk in the Thames Estuary, taking account of the long-term impacts of climate change. It promotes a multi-agency~~

~~approach to implementation of priority strategic and local actions with partners including Government bodies, local authorities and developers. The TE 2100 Plan sets Lewisham Borough within 'Action Zone 2 – Central London'. The Local Plan both supports and helps to set a framework for positively managing development consistent with the TE2100 Plan.~~

Commented [NE605]: Moved to paragraph 11.37 above

SD 8 Sustainable drainage

A. Development proposals should b~~B~~e located and designed having regard to the London Sustainable Drainage Action Plan, ~~along with~~ the Council's Surface Water Management Plan and Local Flood Risk Management Strategy;

Commented [NE606]: Moved from C.a below

~~A.~~B. Development proposals ~~should aim to~~ must achieve greenfield runoff rates and ensure that surface water runoff is managed as close to its source as possible~~.~~ ~~Sustainable Drainage Systems (SuDS) should be incorporated into new development wherever possible, with priority given to green and blue over grey features~~, in line with the London Plan drainage hierarchy~~.~~ ~~, as follows:~~ Proposals for major development and development in a Critical Drainage Area must submit a Drainage Strategy.

Commented [NE607]: Respond to consultation - amended for conformity with London Plan

Commented [NE608]: Moved to criterion C below

~~a. Rainwater use as a resource.~~
~~b. Rainwater infiltration to ground at or close to source.~~
~~c. Rainwater attenuation in green infrastructure features for gradual release.~~
~~d. Rainwater discharge direct to a watercourse, unless not appropriate.~~
~~e. Controlled rainwater discharge to a surface water sewer or drain.~~
~~Controlled rainwater discharge to a combined sewer.~~

Commented [NE609]: Removed to make plan more concise – the drainage hierarchy is set out in the London Plan, which the policy refers

~~B.~~C. Sustainable Drainage Systems (SuDS) should be integrated into development wherever possible with priority given to green and blue over grey measures. All SuDS ~~will be required to~~must meet the Department for Environment, Food and Rural Affairs~~"~~ Non-Statutory Technical Standards~~. They should also~~and be designed ~~to reflect guidance and principles set out in the London Plan Sustainable Design and Construction SPD and~~in accordance with the latest Construction Industry and Research Association (CIRIA) SuDS Manual or equivalent. ~~In addition, all SuDS should:~~ Development proposals must demonstrate that SuDS will function effectively over the lifetime of development.

~~a. Be located and designed having regard to the London Sustainable Drainage Action Plan along with the Council's Surface Water Management Plan and Local Flood Risk Management Strategy;~~

Commented [NE610]: Moved to A above.

~~b. Be sensitively integrated into the development;~~
~~c. Maximise opportunities to enhance biodiversity and local amenity;~~
~~d. Improve the quality of water discharges, with provision for clean and safe water at the surface; and~~
~~e. Function effectively over the lifetime of the development.~~

Commented [NE611]: These are addressed by the SuDS non-statutory technical standards, referred in the policy

Commented [NE612]: Addressed in C above

~~All proposals for major development and development within a Critical Drainage Area must achieve a greenfield runoff rate and volume leaving the site, as demonstrated~~

~~through a Drainage Strategy. All other development will be expected to achieve at least a 50% reduction in existing runoff rates.~~

D. SuDS involving infiltration must not have an adverse impact on groundwater sources. Where infiltration is proposed, the Environment Agency should be consulted to consider the suitability of SuDS having regard to the impact of drainage into the groundwater aquifer.

~~C.~~E. Where it is clearly demonstrated that a greenfield runoff rate cannot be achieved~~,~~ or SuDS cannot be implemented due to reasons of ~~technical~~ feasibility ~~or financial viability~~, development proposals must ~~demonstrate that~~:

a. Ensure that s~~S~~urface water runoff (both in terms of volume and flow) has been reduced as much as reasonably practical; and
b. Investigate and integrate m~~M~~easures to improve water quality ~~have been investigated and implemented, wherever feasible~~.

~~D.~~F. Development proposals should be designed to include permeable surfaces wherever possible. Proposals for impermeable ~~paving~~surfacing, including on ~~small surfaces such as~~ front gardens, ~~and~~ driveways, and car parks, will be ~~strongly resisted~~refused unless it can be suitably demonstrated that this is ~~not technically feasible or appropriate~~unavoidable.

Explanation

~~1.44.~~1.47. Surface water flooding occurs when high intensity rainfall generates runoff which flows and ponds in low-lying areas. It is generally associated with intense rain, saturated soils and an insufficient drainage capacity of the surface water system. Surface water flooding is ~~becoming an increasing~~an issue in London due to continued urban development (increased impermeable area) and climate change (greater rainfall intensity). Lewisham's Surface Water Management Plan (SWMP) identifies 9 Critical Drainage Areas (CDAs) which are particularly susceptible to surface water flooding. The CDAs fall within much of ~~the~~ Lewisham's London Plan Opportunity Area~~s~~ ~~corridor~~ and are also widely present in southern part of the Borough.

~~1.45.~~1.48. New development ~~will be expected to~~must contribute to minimising and mitigating flood risk through the use of Sustainable Drainage Systems ~~(SuDS) and measures~~. SuDS ~~comprise a sequence of~~involve management practices and techniques used to slow the rate of surface water runoff and improve infiltration by mimicking natural drainage. This reduces the risk of flash-flooding which occurs when rainwater rapidly flows into the public sewerage and drainage systems. ~~Drainage measures are particularly important in CDAs however we will seek to ensure that new development proactively responds to surface water management throughout the Borough~~.

~~1.46.~~1.49. Development proposals should ~~seek to~~ reduce flows to a greenfield runoff rate. This is the rate that reflects the natural rate of water runoff from an undeveloped, naturally permeable site. The volume of runoff must be stored on site and be calculated based on the nationally agreed

Commented [NE613]: Respond to consultation – deleted for conformity with London Plan. See B above, all development must achieve greenfield runoff

Commented [NE614]: Respond to consultation – additional wording requested by Environment Agency

Commented [NE615]: Amended for clarity and to aid policy implementation

Commented [NE616]: Removed to make plan more concise – this is covered in the policy

return period value of a 1 in 100 year critical storm event, including an allowance for climate change. ~~For major development and proposals within CDAs, it is particularly important that schemes optimise the use of Sustainable Drainage Systems to achieve these outcomes. The Government has published Non-Statutory Technical Standards for Sustainable Drainage Systems which proposals will be expected to comply with.~~

~~1.47.~~11.50. SuDs should be viewed as more than just a tool to manage surface water flooding. Where they are well designed and sensitively integrated into development, SuDS can enhance the attractiveness and amenity value of a site ~~and area by improving the quality and attractiveness of the public realm and open spaces. Furthermore,~~. T~~t~~hey ~~offer opportunities to~~can also support ~~and enhance~~ biodiversity through the creation of habitats, such as ponds and wetlands, ~~along with~~and by improving the quality of water discharges. ~~All proposals should apply the principles of the latest SuDS Manual published by the Construction Industry Research and Information Association (CIRIA), which is nationally recognised good practice guidance, or other local guidance where appropriate.~~

~~1.48.~~11.51. SuDS should be designed giving priority to 'green' or 'blue' over 'grey' measures~~, although it is recognised that technical feasibility issues may constrain opportunities~~. This policy provides flexibility to implement a variety of SuDS measures, as the techniques used will depend on ~~individual~~ site characteristics and the nature of development proposed. Applicants ~~will be expected to~~must demonstrate that SuDS will function effectively over the lifetime of the development. A Drainage Strategy must accompany all major development proposals and other proposals within a ~~Critical Drainage Area~~CDA. This should include a SuDS Management Plan setting out long-term management and maintenance arrangements.

~~1.49.~~11.52. If it is suitably demonstrated that ~~the policy requirements cannot be satisfied~~a greenfield runoff rate cannot be achieved, for example ~~, by~~due to reasons of site condition (e.g. land contamination ~~or other site constraints~~) or ~~financial viability~~technical feasibility, ~~we will require applicants to provide evidence that~~development proposals must ~~runoff rates have been~~ minimise~~d~~ runoff rates as far as reasonably practical and maximise measures to improve water quality.~~.~~

Figure 11.4 Safeguarded Wharf at Convoys Wharf

SD 9 ~~Water management~~Lewisham's waterways

~~Watercourses and flood defences~~

A. Waterways provide multifunctional social, economic and environmental benefits that support sustainable neighbourhoods and communities. Development proposals should identify and respond positively to the unique attributes of waterways, giving particular consideration to their:
   a. Environmental function and ecological qualities;
   b. Contribution to the Borough's network of open spaces;

Commented [NE617]: Repetition – this is referred in criterion C above

Commented [NE618]: Repetition – this is referred in criterion C above

Commented [NE619]: Amended for clarity and to aid policy implementation

Commented [NE620]: The Local Plan water management and flood risk policies have been restructured throughout for legibility.

c. Recreational and amenity value;
d. Distinctive features that help to shape and reinforce the Borough's physical, cultural and historical character;
e. Support for the visitor economy; and
~~a.~~f. Potential to facilitate water transport, for both passengers and freight.

B. Development proposals on sites containing or adjacent to a main river, ~~or~~ ordinary watercourse or other water space ~~will be required to~~must:
   a. Demonstrate how the objectives of the Thames River Basin Management Plan, Vision for the Tidal Thames, London River Restoration Action Plan, Marine Plan for the South East and other relevant local guidance, including the River Corridors Improvement Plan SPD and Ravensbourne Catchment Improvement Plan, have been taken into account, where appropriate;
   b. Ensure that there is no adverse impact on the natural functioning of the watercourse, including by maintaining an undeveloped buffer zone with an adequate set back distance from the watercourse, as agreed with the Council and the Environment Agency;
   c. Investigate and maximise opportunities to enhance or restore river channels, flood flow pathways, floodplains and other natural flood management features with the objective of returning them to their natural state wherever possible;
   ~~d.a. Where appropriate, provide a condition survey of existing flood defence and other watercourse infrastructure and if necessary, provide for maintenance, repairs or remediation to secure the functional integrity of this infrastructure over the lifetime of the development; and~~
   d. Incorporate measures to enhance the ecological, amenity, recreational and historic value of water spaces, including by enhancing public access to these spaces~~.~~; and
   e. Contribute to a safe riverside environment by making appropriate provision for riparian life-saving equipment such as grab chains, access ladders, life buoys, along with information signage and CCTV.

~~Water quality~~

C. ~~All d~~Development proposals should seek to improve water quality and must ensure that there is no deterioration in the quality of a watercourse or groundwater, in line with the European Water Framework Directive 2000.

~~D.A. Where development is proposed within a Source Protection Zone it must not result in an unacceptable risk to groundwater quality.~~

~~Wastewater and water supply~~

~~E.A. Development proposals will be supported where it is demonstrated that the local water supply and public sewerage networks have adequate capacity both on and off site to serve demand arising from the development; or where such capacity does not exist and there are no programmed works, arrangements are made to ensure adequate provision prior to the occupation of development. A Water Supply~~

Commented [NE621]: Respond to consultation – Port of London Authority request to emphasise potential role for water based transport both for passengers and freight

Commented [NE622]: Respond to consultation – PLA Vision for the Tidal Thames (Thames Vision) to be referred

Commented [NE623]: Respond to consultation – Ravensbourne Catchment Improvement Plan to be included on list of key strategies

Commented [NE624]: This has been moved to Policy SD7 Minimising and managing flood risk

Commented [NE625]: Respond to consultation – include provisions for safer riverside environment

and/or Drainage Strategy may be required to demonstrate that suitable arrangements are in place to service the development.

F.A. Development proposals should ensure the separation of surface and foul water systems, including by rectifying misconnections. The Council will give preference to mains foul drainage and seek to restrict the use of non-mains drainage for foul water disposal, particularly in Source Protection Zones. Where non-mains drainage is proposed for foul water, proposals should implement the most sustainable drainage options as supported by a Drainage Strategy.

G.A. All proposals for new development should maximise opportunities to alleviate water scarcity and be designed to minimise pressure on the combined sewer network by incorporating SuDS in line with Policy SD 8 (Sustainable Drainage), and by meeting the draft London Plan requirements for water efficiency, as follows:

a. All proposals for new residential development should achieve mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption);

b.a. Major non-residential development should achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent.

Strategic role of waterways

Waterways provide multifunctional social, economic and environmental benefits that support sustainable communities. Development proposals should identify and respond positively to the unique attributes of waterways, giving particular consideration to their:

Environmental function and ecological qualities;

Contribution to the Borough's network of open spaces;

Recreational and amenity value;

Distinctive features that help to shape and reinforce the Borough's physical, cultural and historical character;

Support for the visitor economy; and

Potential to facilitate water transport.

H.D. The Lewisham section of the Thames Policy Area is designated in the Local Plan, as reflected in the Policies Map. All new development within the Thames Policy Area will be expected to respond positively to the distinctive character and qualities of the River Thames and its surrounds, in line with Policy LNA 4 (Thames Policy Area and Deptford Creekside).

I.E. Convoys Wharf is included within London's network of safeguarded wharves. The Council will continue to safeguard Convoys Wharf taking into account the Ministerial safeguarding Direction for the wharf and extant planning consents and any future safeguarding Direction. Development proposals involving water transport at Convoys

Wharf will be ~~considered having regard to draft~~ supported where they comply with London Plan policy SI15 (Water transport), along with other relevant policies.

~~J.~~F. Development p~~P~~roposals for water and marine based residential, commercial, community, recreational and transport uses (including moorings and jetties) alongside or within a waterway will only be supported where they:

a. Are demonstrably a water-dependent use;
b. Are appropriately located and designed, taking into account the nature and scale of the proposed use;
c. Respond positively to, and do not adversely impact on, the open character, historic setting and views of the waterway, its frontage (including foreshore) and the surrounding area;
d. Do not have a detrimental impact on river navigation and flood defence infrastructure;
e. Do not have a detrimental impact on the environment, including water quality in line with (B) above;
f. Do not impede or compromise existing public access points to the waterway, and extend or enhance access wherever possible; and
g. Ensure adequate access and servicing arrangements for all intended users of the development.

Explanation

~~Watercourses and flood defences~~

~~1.50. Watercourses within Lewisham form part of the network of rivers and streams within the London basin and are one of the defining features of the Borough. They contribute to local character and visual amenity, offer health benefits through recreational opportunities and provide the setting for Borough's historical past. Watercourses also have an important environmental role in supporting biodiversity and are critical to climate change adaptation through their flood management function. We will seek to ensure that watercourses are positively managed recognising the many important contributions they make to sustainable and resilient communities.~~

11.53. The term 'waterways' refers to the network of linked waterways in London – also known as the Blue Ribbon Network – which includes the River Thames, its tributaries, canals and other water spaces. Waterways are of strategic importance, particularly in Lewisham given its Thames-side location, and provide multifunctional benefits to the environment and local communities. The Lewisham Characterisation Study (2019) is helpful in explaining the significant role waterways have played in the Borough's historical and cultural development, and the way in which they contribute to local character today.

~~1.51.~~1.54. ~~All~~ Development proposals ~~will be expected to~~must demonstrate how they have taken into account the Thames River Basin Management Plan and the London River Restoration Action Plan, particularly in contributing to the European Water Framework Directive (WFD) 2000 objectives. ~~Furthermore, applicants~~They should also refer to and engage positively with ~~Lewisham's~~ the River Corridors

Commented [NE626]: Public consultation – to appropriately reflect the relevant safeguarding Direction and in principle support for water transport, in line with London Plan

Commented [NE627]: Respond to consultation – Port of London Authority request for recreational uses to be included

Commented [NE628]: Repetition – covered

Improvement Plan SPD. The SPD sets out local guidance to ~~secure~~ support the delivery of high quality development along the Borough's river corridors whilst balancing objectives for environmental protection and flood risk management.

~~1.52.~~1.55. Lewisham's river corridors are heavily constrained by urban development along much of their respective lengths. The River Thames has been heavily modified over time with the growth of London, including the construction of raised defences along much of its width. Considerable modifications have also been made to other river channels in the Borough over the past decades including through canalising and culverting. The compromising of natural river processes can adversely impact on biodiversity and water quality. The Council has recently worked with the Environment Agency and other partners to deliver investment in river corridor improvements as part of its ongoing regeneration programme. This includes works along the Rivers Ravensbourne and Quaggy to provide improved defences and dedicated landscaped areas for flood storage, local amenity and improved biodiversity. These schemes have demonstrated that it is possible to put rivers back at the heart of new development and we aim to continue building on these successes.

~~1.53.~~1.56. In order to ensure there is no adverse impact of the natural functioning of a watercourse, or the integrity of a flood defence, all new development must maintain an undeveloped buffer zone with an adequate set back distance from the watercourse. A relief of 8 metres from a main river and 5 metres from an ordinary watercourse should be secured, unless otherwise agreed by the Council and the Environment Agency. Buffer zones should be left free of permanent structures, ensure adequate access for the maintenance of flood defences and be sensitively integrated into development in order to enhance their amenity value. Development within 20 metres of a bank of a main river will need Environment Agency consent. Some rivers have defined flood defence assets and proposals will be required to identify assets and these into consideration, where appropriate.

~~1.54.~~1.57. On sites with existing flood defence infrastructure we will seek to ensure that the functional integrity of this infrastructure is secured over the lifetime of the development. We may require proposals to include a Condition Survey of all existing infrastructure and if necessary, make provision for any necessary repairs or maintenance, to be secured through a legal agreement or planning conditions. Culverts are considered flood defences and sites with existing culverts will be expected to investigate the feasibility of deculverting, with robust justification provided where this is not considered possible.

Water quality

~~1.55.~~1.58. The European Water Framework Directive 2000 (WFD) provides the legal framework for the protection, improvement and sustainable use of waterbodies including rivers and groundwater. The improvement of waterbodies to 'good' ecological status or potential, and not allowing the deterioration in the status of waterbodies, are key requirements of the WFD. Applicants are encouraged to refer the Thames River Basin Management Plan for details of the quality of waterbodies in the Borough and throughout the basin district, along with measures

needed to meet the WFD objectives for water quality. Proposals will be expected to investigate and maximise opportunities to integrate these measures.

11.56.11.1. There are groundwater abstraction points in Lewisham that are used for the public water supply. It is important that groundwater at these points is protected from new sources of pollution, and its quality improved wherever possible. The Environment Agency has identified and mapped Source Protection Zones (SPZs) and aquifers within the Borough. We will seek to ensure that all proposals appropriately consider and manage risk to groundwater contamination in these areas and elsewhere across the Borough. Proposals that present an unacceptable risk to groundwater quality will be resisted.

Wastewater and water supply

1.57.11.1. It is vital that development sites and localities are supported by efficient and well functioning sewerage and wastewater infrastructure, particularly as this plays an important role in the management of flood risk and water quality. Lewisham has a mix of separate and combined sewer systems. Sewer flooding can arise in the foul system when surface water enters via misconnection, or where the capacity of combined systems is exceeded. In both cases this results in surcharge of contaminated surface water. Applicants are encourage to consult with Thames Water who record sewer flooding incidents by postcode area, and this information gives an indication of sewer flood risk at sites across the Borough.

1.58.11.1. All proposals will be expected to demonstrate that there is adequate water supply, surface water, foul drainage and sewerage capacity both on and off-site to service demand arising from the development. Applicants are therefore encouraged to engage with Thames Water, or other water and sewerage undertakers as appropriate, early in the planning and design stage. Where there is a capacity issue and there are no planned capacity works or upgrades, the applicant should agree with the infrastructure provider a programme of necessary improvements. These should be implemented prior to the occupation stage. In some circumstances we may require submission of a Water Supply and/or Drainage Strategy, such as where major development is proposed in an area where there are concerns about existing infrastructure provision. This supporting information should include a detailed model of the network capacity to determine whether mitigation is required.

1.59.11.1. For surface water, development should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. Where it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Where it is proposed to discharge to a public sewer prior approval from Thames Water Utilities will be required.

1.60.11.1. The Thames Tideway Tunnel is a major project being undertaken by Thames Water and Thames Tideway Limited. The project will assist in upgrading to London's sewerage system to cope with long term future demands. A new 25 kilometre interception, storage and transfer tunnel is being constructed, running up to 65 metres below ground and below the River Thames. The sewer will run

~~across London and capture flows from sewer overflow points along the River Thames. There are two temporary major works sites within Lewisham, one at Earl Pumping Station and one at Deptford Church Street. We will continue to work with stakeholders to secure the delivery of this strategic infrastructure.~~

~~1.61.~~11.1. ~~The built environment plays a significant role in the way water is consumed, distributed and disposed of. London experiences lower rainfall than the national average while having a very large population. It has been declared an area of serious water stress and this trend is likely to be exacerbated by climate change. The Council supports London Plan objectives for delivering a sustainable and secure water supply, and addressing water scarcity, particularly in the context of a growing population and increased demand for this valuable resource.~~

~~1.62.~~11.1. ~~All development should be designed to maximise water efficiency. New residential development will be required to meet the draft London Plan target for mains water consumption, which reflects the Optional Requirement set out in Part G of the Building Regulations. Major non-residential development will be expected to meet BREEAM excellent standard for the 'Wat 01' water category, to achieve at least a 12.5% improvement over defined baseline performance standard. In addition, major developments and high or intense water use developments (such as hotels) should include a grey water and rain water harvesting system, and applications will be required to submit robust justification where such a system is not considered feasible.~~

Commented [NE629]: Moved to new standalone policy SD10 wastewater and water supply

~~Strategic role of waterways~~

~~The term 'waterways' refers to the network of linked waterways in London – also known as the Blue Ribbon Network – which includes the River Thames, its tributaries, canals and other water spaces. Waterways are of strategic importance, particularly in Lewisham given its Thames side location, and provide multifunctional benefits to the environment and local communities. The Lewisham Characterisation Study (2019) is helpful in explaining the significant role waterways have played in the Borough's historical and cultural development, and the way in which they contribute to local character today.~~ ~~Waterways also form part of the local network of open space, offering recreational opportunities and amenity value for residents and visitors. Further, as set out elsewhere in this section, the water environment is crucial to supporting biodiversity and flood risk management. All development proposals will be expected to respond positively to the unique attributes of Lewisham's waterways. Applicants should provide planning statements that detail how the different functional values of water spaces have been taken into account. This is particularly important for proposals within the Thames Policy Area, for which further detailed policies are set out in Policy LNA 4 (Thames Policy Area and Deptford Creekside), and reflect the key objectives for the Thames Policy Area: Bermondsey to Woolwich set out in sub-regional strategies.~~

Commented [NE630]: Moved to first paragraph of supporting text above

Commented [NE631]: Repetition – covered elsewhere in the plan

Water infrastructure

~~1.63.~~1.59. There is a network of wharves along the River Thames that are protected for use as a wharf by a safeguarding Direction issued by the Secretary

of State ~~for Housing, Communities and Local Government~~on 1st March 2021.[147] ~~. The existing network dates from 2005 and includes one wharf in Lewisham, Convoys Wharf. The London Mayor undertook a review of the network in 2018[148] and this included some recommended changes. The Council submitted representations through the formal consultation process, and highlighted its position that the review did not reflect the extant outline planning permission at Convoys Wharf, granted by the Greater London Authority in 2015. In particular, the planning permission has effectively reduced the size of the wharf and sets conditions with respect to its future use. The London Mayor is currently considering consultation responses and will submit recommendations for safeguarding to the Secretary of State, who will then make a determination on the matter. The Council will continue to safeguard Convoys Wharf taking into account the extant planning consent and any future safeguarding Direction.~~

~~1.64.~~1.60. ~~We strongly support the use of~~Development proposals at Convoys Wharf should support and enable appropriate waterborne and riverside uses, ~~to facilitate delivery of the Lenox Project,~~ consistent with the safeguarding Direction, London Plan policy S15 (Water transport) and extant planning consent~~s at this strategic development site~~. 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 ~~will~~ 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.

~~1.65.~~1.61. It is important that water infrastructure, including residential and commercial moorings, do not adversely impact on the Borough's waterways. Where new development is proposed on, ~~or~~ within or adjacent to a waterway, including the foreshore, ~~we will expect~~ applicants ~~to~~ should consult with the relevant ~~authorities and~~ bodies including Environment Agency, Port of London Authority, Marine Management Organisation, ~~and~~ the Canal and River Trust, and river catchment partnerships such as Your Tidal Thames. Early engagement will help to ensure that development is appropriate to its location and does not result in a detrimental impact on waterways, including on navigation, water quality, biodiversity, flood defences and local character. Proposals must demonstrate that there will be adequate access and servicing arrangements to support all intended users of the development, and that any new provision is sensitively located into the site and its surrounds. ~~We will strongly resist~~Development proposals that unnecessarily inhibit or detract from existing public access to waterways, or preclude future opportunities for enhanced access from being delivered will be refused.

Commented [NE632]: Respond to consultation – the plan should be amended with this factual update

Commented [NE633]: Respond to consultation – Changes requested by Port of London authority to ensure plan is consistent with the Ministerial direction and London Plan.

Commented [NE634]: Respond to consultation – PLA request to also refer engagement on development adjacent to waterways

Commented [NE635]: Respond to consultation – MMO and river catchment partnerships groups should be referred as part of engagement

[147] This refers to the safeguarding Direction issued by the Secretary of State for the former Department of Housing, Communities and Local Government, now Department for Levelling Up, Housing and Communities.

[148] ~~The Safeguarded Wharves Review 2018. Greater London Authority. 2018.~~

SD 10 Water supply and wastewater

A. Development proposals for new water supply and wastewater facilities or the expansion of existing facilities will be supported where the development:
   a. Makes provision for infrastructure that is required within the Borough as demonstrated by an asset management or similar investment plan;
   b. Will not result in an unacceptable adverse impact on the environment, human health, public safety, amenity and local character; and
   c. Will be constructed in a timely and sustainable manner.

B. Development proposals ~~will be supported where it is~~should have regard to Drainage and Wastewater Management Plans (DWMPs) and must demonstrate~~d~~ that the local water supply and public sewerage networks have adequate capacity both on and off-site to serve demand arising from the development; or where such capacity does not exist and there are no programmed works, arrangements are made to ensure adequate provision prior to ~~the~~ occupation ~~of development~~. A Water Supply and/or Drainage Strategy may be required to demonstrate that suitable arrangements are in place to serv~~ice~~ the development.

C. Development proposals should ensure the separation of surface and foul water systems, including by rectifying misconnections. ~~The Council will give preference to~~ Proposals should prioritise mains foul drainage and ~~seek to restrict~~avoid the use of non-mains drainage for foul water disposal, particularly in Source Protection Zones. Where non-mains drainage is proposed for foul water~~. proposals should implement~~ the most sustainable drainage options must be implemented, as supported by a Drainage Strategy.

~~All proposals for new development should maximise opportunities to alleviate water scarcity and be designed to minimise pressure on the combined sewer network by incorporating SuDS in line with Policy SD 8 (Sustainable Drainage), and by meeting the draft London Plan requirements for water efficiency, as follows:~~

~~All proposals for new residential development should achieve mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption);~~

~~Major non-residential development should achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent.~~

D. Development proposals should be designed to be water efficient, reduce water consumption and minimise pressure on the combined sewer network by integrating SuDS and complying with the London Plan requirements for water efficiency. Planning conditions will be applied to ensure that water efficiency standards are met.

E. ~~Where d~~Development ~~is proposed~~ proposals within a Source Protection Zone ~~it must not result in an unacceptable~~will only be supported where there is no risk ~~to~~ of contamination to groundwater ~~quality~~sources~~,~~ or if a risk is identified, it is suitably demonstrated that adequate mitigation measures will be implemented.

Commented [NE636]: Respond to consultation – request for policy to provide in-principle support for new water supply and wastewater facilities

Commented [NE637]: Respond to consultation – policy should specifically refer DWMPs

Commented [NE638]: Moved from previous policy SD9 Water Management

F. Development proposals for piled foundations must ensure that disturbances to the ground will not lead to adverse impacts on water quality, including turbidity in the water supply. Development proposals on or in proximity to sites with contaminated land must not introduce new pathways for contamination materials to reach groundwater.

~~Wastewater and water supply~~ Explanation

1.62. ~~It is vital that d~~Development sites and localities ~~are~~must be supported by efficient and well-functioning sewerage and wastewater infrastructure~~, particularly as this plays an important role in the management of flood risk and water quality~~. The Council will continue to work with its key stakeholders, including Thames Water and other water companies, on its Infrastructure Delivery Plan. However, the short-term nature of water companies' investment plans means that it is not possible to identify all of the infrastructure required over the plan period. The Local Plan therefore provides in-principle support for new or upgraded water supply and wastewater infrastructure where required.

1.63. Lewisham has a mix of separate and combined sewer systems. Sewer flooding can arise in the foul system when surface water enters via misconnection, or where the capacity of combined systems is exceeded. In both cases this results in surcharge of contaminated surface water. ~~Applicants are encourage to consult with~~ Thames Water ~~who~~ record sewer flooding incidents by postcode area~~,~~ and~~nd~~ this information ~~gives an indication of sewer flood risk~~should be referred ~~at sites across the Borough~~.

1.64. ~~All proposals will be expected to demonstrate that there is adequate water supply, surface water, foul drainage and sewerage capacity both on and off-site to service demand arising from the development.~~ Applicants ~~are therefore encouraged to~~should engage with Thames Water, or other water and sewerage undertakers ~~as appropriate~~, early in the planning and design ~~stage~~process. Where there is a capacity issue and there are no planned capacity works or upgrades, the applicant should agree with the infrastructure provider a programme of necessary improvements. These should be implemented prior to ~~the~~ occupation ~~stage~~. ~~In some circumstances we may require submission of~~ A~~a~~ Water Supply and/or Drainage Strategy may be required, such as ~~where~~for major development in ~~is proposed in an~~ areas where there are concerns about existing infrastructure provision. This supporting information should include a detailed model of the network capacity to determine whether mitigation is required.

1.65. ~~For surface water,~~ New development should ensure that storm flows are attenuated or regulated into the receiving public network through on or off-site storage. Where it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Where it is proposed to discharge to a public sewer prior approval from Thames Water ~~Utilities~~ will be required. Connections to trunk sewers should be avoided - an alternative point of connection to a non-trunk sewer or requisition a new connection and associated pipe laying will be required. It is the responsibility of a developer to make proper provision for surface water drainage to ground.

Commented [NE639]: Respond to consultation – inclusion of policy points recommended by Environment Agency and Thames Waster

Commented [NE640]: The majority of the policy supporting text has been moved from previous Policy SD Water management

Commented [NE641]: Respond to consultation – supporting text included to support new policy SD10.A

water courses or surface water sewer. It must not be allowed to drain to the foul sewer as this is the major contributor to sewer flooding.

11.66. The Thames Tideway Tunnel is a major project being undertaken by Thames Water and Thames Tideway Limited. The project will assist in upgrading to London's sewerage system to cope with long-term future demands. ~~A new 25-kilometre interception, storage and transfer tunnel is being constructed, running up to 65 metres below ground and below the River Thames.~~ The 'supersewer' will run across London and capture flows from sewer overflow points along the River Thames. There are two ~~two temporary major works~~ sites within Lewisham, one at Earl Pumping Station and one at Deptford Church Street. ~~We will continue to work with stakeholders to secure the delivery of this strategic infrastructure.~~ New development should not adversely impact on the construction, operation and long-term maintenance of the tunnel infrastructure.

11.67. The built environment plays a significant role in the way water is consumed, distributed and disposed of. ~~London experiences lower rainfall than the national average while having a very large population.~~ The Environment Agency ~~It~~ has ~~been~~ declared the Thames Water region as ~~an area of~~ to be "seriously water stressed" and this trend is likely to be exacerbated by climate change. ~~The Council~~This policy supports London Plan objectives for delivering a sustainable and secure water supply, and addressing water scarcity~~, particularly in the context of a growing population and increased demand for this valuable resource~~.

11.68. ~~All development should be designed to maximise water efficiency.~~ New residential development ~~will be required to~~must meet the ~~draft~~ London Plan ~~target~~standard for mains water consumption, which reflects the Optional Requirement set out in Part G of the Building Regulations. Major non-residential development ~~will be expected to~~must meet BREEAM excellent standard for the 'Wat 01' water category, to achieve at least a 12.5% improvement over defined baseline performance standard. In addition, major developments and high or intense water use developments (such as hotels) should include a grey water and rain water harvesting system, and applications ~~will be required to submit~~must provide robust justification where ~~such a system~~this is not considered feasible. Planning conditions will be used to ensure water efficiency targets are met.

11.69. There are groundwater abstraction points in Lewisham that are used for the public water supply. ~~It is important that groundwater at these points is protected from new sources of pollution, and its quality improved wherever possible.~~ The Environment Agency has identified and mapped Source Protection Zones (SPZs) and aquifers within the Borough. ~~We will seek to ensure that~~ D~~all~~evelopment proposals ~~appropriately~~must ~~consider~~assess and manage risk to groundwater contamination in these areas and elsewhere across the Borough. Proposals that present an unacceptable risk to groundwater quality will be ~~resisted~~refused.

SD ~~10~~11 Ground conditions

~~Contaminated land~~

Commented [NE642]: Respond to consultation – recommended supporting text to aid policy implementation

Commented [NE643]: Respond to consultation – make clear that new development must not adversely impact on Tideway Tunnel

A. Development proposals that will enable contaminated sites to be brought back into beneficial use will be supported where the requirements of B-D below are satisfied.

~~A.~~B. Development proposals must demonstrate that any risks associated with land contamination, including to human health, public safety and the environment~~, can~~ will be adequately addressed in order to make the development safe.

~~B.~~C. ~~All proposals for D~~development proposals on land which is suspected of being contaminated or potentially contaminated, or if a sensitive use is proposed, ~~will be required to~~must submit a Preliminary Risk Assessment (Phase 1 Study) to identify the level and risk of contamination on the site and adjacent land, and where necessary:

a. Undertake a Site Intrusive Investigation (Phase 2 Study) to provide a detailed assessment of contamination and risks to all receptors;
b. Prepare a Risk Management and Remediation Strategy appropriate to the individual site circumstances; and
c. Submit a Verification Plan and Closure Report prior to the occupation of the development.

~~Hazardous substances~~

D. Development proposals involving the storage or use of hazardous substances, or development of a site in the vicinity of a hazardous installation, will only be permitted where it is demonstrated that appropriate safeguards are in place to ensure there is no unacceptable risk to human health, public safety and the environment.

~~C.~~E. Planning conditions may be applied to ensure that remedial measures will be implemented and the development is safe prior to occupation.

Explanation

Contaminated land

~~1.66.~~1.70. Contaminated land is defined within the Environmental Protection Act 1990. It refers to land that has been polluted with harmful substances to the point where it could pose an unacceptable risk to human health and the environment. Environmental health and planning legislation requires the Council to ensure that land is assessed for contamination and made suitable for current and proposed future uses. Through the planning process we will seek that all development is appropriate to its location, whilst requiring landowners and developers to fulfil their responsibility for securing safe development where a site is affected by contamination.

~~1.67.~~1.71. In order to appropriately identify and manage the risks associated with land contamination ~~we will require~~development proposals ~~to~~ must undertake a series of steps to ensure that development is safe. In the first instance a Preliminary Risk Assessment must be undertaken. This should consist of a desktop study and site walkover report that shows all previous and existing uses of the site and adjacent land. It should assesses the potential contamination risks

Commented [NE644]: Respond to consultation – Local Plan should be more proactive in supporting land remediation to enable development to come forward

Commented [NE645]: Respond to consultation – the Council should seek to use planning conditions to secure remedial measures for contaminated sites

to identified receptors. Following this preliminary assessment applicants will be required to submit, where appropriate:

- A Site Intrusive Investigation which provides a more detailed assessment of site characteristics and risks to receptors;
- Where contamination is present, a Risk Management and Remediation Strategy to deal with the identified hazards to human health and the environment, along with site management and monitoring arrangements;
- A Verification Plan for any remediation works, completed by a suitably qualified professional, in order to ensure effective measures to protect: occupiers of the development and neighbouring land uses; the structural integrity of new and existing buildings; and any watercourses or aquifers; and
- A Verification/Closure Report, to be submitted prior to occupation, which demonstrates completion and validation of the works set out in the approved Risk Management and Remediation Strategy, including results of sampling and monitoring carried out in accordance with the Verification Plan.

~~1.68.~~1.72. The Council's Environmental Protection ~~(EP)~~ service maintains a Contaminated Land Register and the ~~EP~~ Council's website ~~pages~~ provides information that can direct applicants to further resources which may assist with site investigations and possible remedial measures. Planning conditions may be used to secure appropriate measures prior to the commencement and occupation of development.

~~1.69.~~1.73. When contaminated land has the potential to affect watercourses or groundwater, the Environment Agency should be contacted, as in certain circumstances it is the responsible authority under the Environmental Protection Act 1990.

Hazardous substances

~~1.70.~~1.74. Hazardous installations consist of sites and facilities for chemical processing, fuel and chemical storage and pipelines. It is important that any risks associated with hazardous substances (including to human health, safety and the environment) are appropriately managed and mitigated. There are listed hazardous installations both within and in proximity to the Borough, including the Lower Sydenham Gas Holders. Whilst hazardous substances are controlled by the separate need for hazardous substances consent along with health and safety regulations, the Local Plan also has a role in ensuring public safety from major accidents, consistent with the NPPF and its associated guidance.

~~1.71.~~1.75. All planning applications for hazardous installations, or the use of land in proximity to them, must suitably demonstrate that development will not constitute a risk to the population or the environment. In considering proposals and potential risks, we will apply the Health and Safety Executive (HSE) land use planning methodology and consult with the HSE, Environment Agency and other stakeholders as appropriate. Depending on individual site circumstances proposals may be required to submit a Preliminary Risk Assessment and/or a Risk Management Strategy that clearly identifies risks and sets out measures to appropriately manage and mitigate these.

SD ~~11~~12 Reducing and sustainably managing waste

A. The Council will ensure that waste is sustainably managed in ways which protect human health and the environment. A circular economy approach will be promoted in Lewisham in order to conserve and make a more efficient use of resources, to achieve increases in the re-use and recycling of materials and reductions in waste going for disposal. Development proposals ~~should~~ must apply the waste hierarchy and follow circular economy principles ~~in the design and construction process~~, in line with Policy SD 1~~2~~3 (Design to support the circular economy).

B. To help London achieve ~~net~~ waste net self-sufficiency, ~~and ensure~~meet the Borough's strategic waste apportionment target ~~is met~~ and other requirements, including the London Mayor's recycling and composting targets, the Council will work in partnership with ~~the local authorities comprising~~ stakeholders including the South East London Joint Waste Planning Group ~~to identify and safeguard strategic sites suitable for waste management~~. The following ~~existing sites will be~~ are strategically safeguarded waste sites in Lewisham:
   a. South East London Combined Heat and Power (SELCHP) energy recovery facility, New Cross
   b. Recycling Centre (HTL Waste Management Services), New Cross
   c. Reuse & Recycling Centre (London Borough of Lewisham), New Cross.

C. Development proposals that will result in the loss of an existing waste site through a change of use will only be permitted where adequate replacement waste processing capacity is secured in accordance with London Plan policy SI9 (Safeguarded waste sites).

D. Development proposals for new waste management facilities will only be permitted where:
   a. They are required within the Borough to meet an identified strategic need, having regard to the proximity and self-sufficiency principles;
   b. It is demonstrated that the waste management capacity at existing safeguarded waste sites has been maximised, and there are no opportunities for appropriately increasing capacity at these sites to meet the identified need;
   c. They are located within a Strategic Industrial Location, or involve alterations or extensions to an existing facility located outside a SIL, and have high quality supporting infrastructure necessary for the intended use;
   d. 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 SI8 (Waste capacity and net waste self-sufficiency); and
   e. They will not result in any adverse impacts on human health, the natural environment and local amenity, having regard to relevant legislation and other development plan policies.

E. Development proposals for waste management facilities must be located and designed with reference to the Agent of Change principle. They should be fully

Commented [NE646]: Amended to ensure the local plan aligns with the Council's adopted and emerging Waste Management Strategy, and in line with the Waste Framework Directive

Commented [NE647]: Respond to consultation – recognition that there are additional sites with licenced waste capacity (i.e. Environment Agency permits) which are safeguarded in line with the London Plan

Commented [NE648]: Amended to aid effective policy implementation – the proximity principle is that waste should be managed as close to its source as possible, and is set out in higher level policy

Commented [NE649]: Respond to consultation – additional criterion to ensure waste management facilities are appropriately supported by infrastructure

enclosed on all sides and have a roof along with fast-acting doors, and must be designed with these measures where the development is likely to have a significant impact on impact on local amenity.

~~E.~~F. Where development proposals involve alterations to an existing waste management facility, they must demonstrate how they have maximised opportunities to improve the environmental performance of the facility as well as to reduce and mitigate its impact on local amenity.

Explanation

~~1.72.~~1.76. The waste hierarchy (see Figure 11.6) is set out by the Waste Framework Directive [149] and provides a framework for how waste management can be made more sustainable. The aim is to move up the hierarchy away from a reliance on waste disposal. The ~~draft~~ London Plan ~~advocates~~ principles on the 'circular economy' ~~as a strategic approach to~~for the sustainable use and management of materials and waste (see Figure 11.7) aligns with the hierarchy. 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. ~~The main principles of the circular economy, which are explained in detail in the draft London Plan, are reflected in the Figure 11.6 below. These principles should be applied in the design and construction stages of all new development.~~ The successful implementation of the~~se~~ waste hierarchy and circular economy principles ~~will help~~ are necessary to reduce the volume of waste that is produced and will need to be managed both in Borough and across London. The policy supports the Council's Waste Management Strategy 2021-2031. The strategy includes targets for recycling and composting which are cross-referenced in the Local Plan monitoring framework. ~~Transition towards the circular economy in Lewisham is necessary to support wider regional and national strategies on sustainable waste management. This is recognising that the continuation of the current linear economy approach (where resources are taken to make products, which are then disposed of at the end of their useful lifetime) would require significant investment in additional waste infrastructure along with land to support this.~~

1.77. The ~~draft~~ London Plan includes a strategic objective for London to be ~~net~~ waste net self-sufficient by 2026. This means that all waste generated in ~~the city~~ London 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 ~~B~~borough, which is set out in tonnes. It then requires ~~B~~boroughs to allocate sufficient land ~~or sites,~~ and identify facilities~~,~~ to manage the apportioned tonnages of waste. The Council will continue with the approach to 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 (SELJWPG). This includes Lewisham, ~~along with~~ Bexley, Bromley, Royal Borough of Greenwich~~,~~ and Southwark ~~and~~ along with the City of London Corporation. The South East London Joint Waste Technical Paper has

[149] Directive 2008/98/EC of the European Parliament and of the Council, 19 November 2008.

Commented [NE650]: Respond to consultation – request for additional criterion to protect amenity and to ensure conformity with London Plan

Commented [NE651]: Respond to consultation – included to help address concerns with existing safeguarded waste facilities on public health and environment

Commented [NE652]: Supporting text amended to explain the waste hierarchy.

Commented [NE653]: Removed to make more concise – covered by the London Plan, which is referred in the policy

Commented [NE654]: Included to reflect new adopted Strategy

Commented [NE655]: Respond to consultation – include targets for waste management

Commented [NE656]: Removed to make more concise – covered by the London Plan, which is referred in the policy

been prepared by the SELJWPG and provides further details on the pooled apportionment and ~~strategic~~ waste management sites with capacity to manage this over the long-term. The Technical Paper will be subject to periodic review and updating where necessary.

~~1.73.~~1.78. There are 3 strategic waste management sites in Lewisham which are safeguarded ~~in~~ by the Local Plan~~.~~. ~~which~~ They are located within the ~~Strategic Industrial Location~~SIL at Surrey Canal Road. These sites and facilities are necessary to ensure that the Borough's London Plan waste apportionment can be met, along with the pooled apportionment of the constituent SELJWPG authorities. In addition, there are a number of sites within the Borough with waste management permits from the Environment Agency. The London Plan states that waste sites should only be released to other land uses where waste processing capacity is re-provided elsewhere within London, based on the maximum achievable throughput of the site proposed to be lost.

Commented [NE657]: Respond to consultation – reference made to explain London Plan requirements on safeguarded waste sites, in line with policy addition C above

~~1.74.~~1.79. The South East London Joint Waste Technical Paper ~~provides~~ demonstrates that there is currently sufficient waste management capacity in the constituent Boroughs to meet the London Plan pooled apportionment. It also shows that there is a sufficient surplus of capacity that will provide for a robust buffer against any future changes to the sub-region's apportionment requirements. Development p~~P~~roposals for new waste management facilities (including extensions to existing facilities) will therefore only be supported where they are required to meet an identified strategic need within the Borough, taking into account the pooled capacity within the sub-region, and also having regard to the proximity and circular economy principles. We will ~~expect~~ require all applications to provide evidence of a local need and to demonstrate that capacity at existing sites has been fully maximised before pursuing other development alternatives, taking into account the technical feasibility and financial viability. Consideration should be given to the enhancement of existing facilities through the site selection process. ~~We will require that all~~Development proposals for new or enhanced waste management facilities ~~are~~ must be located within ~~Strategic Industrial Locations~~SILs, unless the proposal relates to an existing authorised facility, which are the Borough's designated locations for general industrial and storage uses. Other employment areas are not appropriate for this type of use. This is because the successful delivery of spatial strategy relies on the intensification of Mixed-use Employment Locations, ~~and~~ Locally Significant Industrial Sites and certain non-designated employment land, giving priority to Class ~~B1~~ E(g) (office and light industrial) uses to meet future employment needs. ~~All~~ Development proposals for waste management ~~facilities~~ will be ~~required to demonstrate that there will be no adverse impacts on human health, the natural environment and local amenity. Proposals will be~~ assessed against relevant London Plan policies~~, including draft Policy SI8 (Waste capacity and net waste self-sufficiency)~~.

Commented [NE658]: Amended to make more concise – this is stated in the policy above.

Table 11.1 Safeguarded strategic waste sites

Commented [NE659]: Respond to consultation – amended for clarification. There are other 'non-strategic' waste sites in borough with licenced waste capacity and are safeguarded by virtue of the London Plan. These sites are safeguarded as integral to meeting London Plan waste apportionment figure

Facility	Address	Site size	Licenced capacity (tonnes)	Average annual throughput

				(tonnes)
South East London Combined Heat & Power (SELCHP) energy recovery facility	Landmann Way, New Cross, SE14 5RS	2.30 ha	464,000	426,880
Deptford Recycling Centre	Landmann Way, New Cross, London SE14 5RS	0.63 ha	130,000	52,000
Landmann Way Reuse & Recycling Centre	Landmann Way, New Cross, Lewisham, SE14 5RS	0.24 ha	~~TBC~~25,000	~~5,660~~ 6,650

Commented [NE660]: Factual updates

Figure 11.5 Safeguarded Waste Sites

Figure 11.6 Waste hierarchy

Figure 11.~~7~~6 Circular Economy Principles (London Plan and Dave Cheshire, AECOM)

SD ~~12~~13 Design to support the circular economy

~~A. All development proposals will be expected to apply circular economy principles in order to minimise waste and support the delivery of sustainable development in Lewisham. Consideration should be given to the circular economy hierarchy for building approaches, as set out in the draft London Plan, at the start of the design process taking into account the following principles:~~

- ~~a. Building in layers, ensuring that different parts of buildings and spaces are accessible and can be maintained and replaced when necessary;~~
- ~~b. Designing out waste, ensuring that waste reduction is planned in from project inception to completion (including consideration of standardised components, modular build and re-use of secondary products and materials);~~
- ~~c. Designing for adaptability;~~
- ~~d. Designing for disassembly; and~~
- ~~e. Using materials that can be re-used and recycled.~~

A. Development proposals should apply circular economy principles in order to conserve resources and improve resource efficiency, with reference to London Plan policy SI7 (Reducing waste and supporting the circular economy).

B. Major development proposals should aim to be net zero-waste. ~~They will be required to~~Development proposals that meet the threshold for being referable to the Mayor of London must submit a Circular Economy Statement, as part of the Sustainable Design Statement, in line with ~~the requirements of draft~~ London Plan policy SI~~1~~7 ~~(Reducing waste and supporting the circular economy)~~.

Commented [NE661]: Amended for clarity – align with the requirement set out in the London Plan

C. Development proposals ~~will be expected to~~must sustainably manage both the type and volume of recyclable materials and waste arising from the development during the construction and operational phases.

D. Development proposals must be designed to ensure adequate on-site provision for the sorting of recyclable material, composting of organic material and the disposal of general waste during the occupation stage. ~~Proposals will be expected to~~They must make provision for:

   a. Dedicated internal and external storage facilities, with flatted residential development including temporary storage space for each unit and communal storage for waste materials pending collection;
   b. Safe and convenient access to storage facilities, both for building occupiers and collection services;
   c. Well sited and designed development that avoids and mitigates adverse impact on the amenity of building occupiers and neighbouring site users and uses; and
   d. Separate provision for commercial and household waste where mixed-used development is proposed.

E. All proposals for new multi-storey ~~flatted residential~~ development, including ~~mixed-use~~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 ~~fully investigate design options for basement servicing before giving consideration to the~~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~~.~~

F. Where public realm is included as part of a development proposal appropriate provision for recycling and waste ~~management~~ disposal facilities ~~appropriate to this element~~ will be required. Provision should be sensitively located and designed~~. This includes~~ with accessible and clearly legible facilities to enable the public to easily distinguish between options for sorting of recyclable material, disposal of general waste and where appropriate, composting of organic material.

Explanation

~~1.75. The circular economy supports a holistic and sustainable approach to the use and management of materials. Lewisham can make a significant contribution to helping London achieve net waste self-sufficiency if new buildings and spaces within the Borough are designed in a way that avoids and reduces waste arisings and supports high recycling rates. By seeking that new developments apply circular economy principles in the design and construction process, we aim to prioritise the re-use and recycling of materials over their disposal.~~

Commented [NE662]: Respond to consultation – greater flexibility for design solutions

Commented [NE663]: Policy text amended throughout to make more concise.

Commented [NE664]: Repetition – covered in Policy SD11 above

1.76.1.80. ~~Applicants~~ Development proposals should refer the London Plan and London's circular economy route map[150] for further policies and guidance on the application of circular economy principles. ~~Large-scale developments present significant opportunities to support the transition to more sustainable and innovative building design and construction, particularly where they are to be delivered through the comprehensive redevelopment of sites. In line with the draft London Plan, m~~Major development proposals ~~will be required to~~present significant opportunities for innovative design and construction. Development proposals that are referable applications to the Mayor of London must submit a Circular Economy Statement demonstrating how the circular economy ~~hierarchy~~ principles have~~s~~ been taken into account. This should be included as part of the Sustainable Design statement. The London Mayor's ~~has committed to providing further guidance on~~ Circular Economy Statement~~s, covering the construction phase of development~~ Guidance should be referred for further information.

1.77.1.81. Development proposals should ~~seek to~~ maximise opportunities ~~for~~ to design adaptable ~~design of~~ buildings and spaces. Residential developments are unlikely to ~~come forward for a~~ change ~~of~~ use ~~over the long term~~ given housing needs and residential land values in the Borough. However this should not discourage ~~applicants from considering building options~~ designs that can extend the life of developments, for example, ~~by using~~with durable materials and ~~designing~~ adaptable spaces ~~that can be modified to the needs of different users~~. Non-residential developments, such as retail and commercial uses, are likely to have shorter lifespans or a range of end-users and are therefore well ~~positioned to support more comprehensive approaches~~suited to adaptive design. ~~This is in part owing to the changing requirements of building occupiers and business turnover, particularly in the context of London's competitive and evolving economy.~~

1.78.1.82. All development proposals ~~will be expected to~~must consider options for sustainably managing the materials used and arising from the development using the design-led approach. ~~Consideration at the early stages in the design process will help to~~This will ensure the most appropriate and practical solutions are employed during the construction and occupation stages. It is important that recycling, composting and waste management facilities are well designed ~~and sensitively integrated into new development~~, particularly in the interests~~. This will help to ensure protection~~ of amenity ~~and avoidance of nuisance, both for site occupiers as well as those in surrounding properties~~. New multi-storey flatted development poses unique challenges given the number of households that require provision, the limited space available for sorting, collection and servicing, and the unique nature of managing waste through vertically stacked buildings. However, this should not preclude occupiers benefitting from suitable and convenient access to facilities, and that waste collection services are not compromised by poorly designed and laid out buildings.

1.79.1.83. Public realm must also be adequately serviced with readily accessible and clearly legible recycling and waste ~~management~~ disposal facilities, where

[150] London's C~~c~~ircular E~~e~~conomy R~~r~~oute M~~m~~ap, GLA & London Waste and Recycling Board. 2017

appropriate. Public spaces should include adequate provision of facilities that encourage easy separation of recyclable and waste materials at the point of disposal. Not only will this assist with reducing waste but it can help to protect local amenity through the avoidance of unsightly litter.

12 Transport and connectivity

What you've told us

Public transport improvements needed

- Wide support for the Bakerloo line extension
- Better bus routes and more reliable services are needed, especially in areas lacking good rail services
- Concerns with overcrowding on train platforms
- More trains are needed on the Catford Loop line

Walking and cycling should be encouraged by:

- Making routes and pathways safer and easier to use
- Improving routes between parks and open spaces

Concerns with local roads

- Many are too busy and polluted
- Vehicles passing through the borough add to traffic and congestion
- Too much reliance on main roads, such as the South Circular
- Safety on major roads, especially in and around town centres

Mixed views on car parking

- Car-free development must be carefully considered
- Pressure for parking on streets if new residents are not provided with spaces
- Local businesses often rely on parking for customers

What we've learned

Some parts of Lewisham are more accessible than others

- The DLR, Overground and rail services link with Lewisham. But these are mainly north-south routes, and there is no direct access to the Underground.
- Most areas in the north are better served by public transport than those in the south.
- More people own cars in areas lacking good access to public transport

Pollution and congestion

- Major roads (such as the A21, A2 and South Circular) are often congested and pollution hotspots.
- Traffic affects bus journey times - busy (high frequency) routes take about 20% longer than intended
- The Ultra-Low Emission Zone (ULEZ) will be extended to north Lewisham

Public transport: improvements planned but more investment needed

- The Bakerloo line extension will greatly improve transport access in Lewisham and south London - land must be safeguarded for stations and routes.
- Funding secured for upgrades to the Overground and DLR will improve services, including a new Overground station in Deptford
- Foot traffic at Lewisham interchange has tripled over the past 15 years
- New platforms at Brockley station would allow for an interchange between the Overground and the Lewisham-Victoria rail line
- Stations and platforms are becoming busier at peak travel times, with some overcrowding
- Not all stations in the Borough have step-free access
- Our research suggests there are some 280,000 trips daily that could be made by bicycle instead of a car or public transport.

Main issues

Public transport access

Lack of public transport options in many parts of Lewisham limits people's access to opportunities - for schools, jobs, services and community facilities.

North-South links Lack of east-west routes

Lewisham benefits from good north-south links to and from central London but east-west routes are lacking, making trips across Lewisham and into neighbouring areas more difficult.

Rising demand for services

Population growth will increase demand for public transport. Improved facilities and services are needed to keep journeys safe and convenient.

Improving transport options
There is potential to boost the number of journeys made by walking and cycling by investing in new and improved routes.

Environmental impacts

Vehicle use and traffic contributes to pollution and carbon emissions.

We're proposing to…

Promote walking and cycling

- Make trips by walking, cycling and public transport safer and more convenient
- Carefully manage the amount of car parking

Make neighbourhoods healthier and more liveable

- Transform major roads into 'Healthy Streets' that are greener and safer for walking and cycling
- Create the 'Lewisham Links', a network of high quality walking and cycle routes that link green spaces

Secure improvements to the transport network

- Work with partners to deliver the BLE and Lewisham interchange upgrade to improve accessibility and support growth
- Re-route the South Circular to help regenerate Catford town centre
- Enable river bus services with a stop at Convoys Wharf
- Require new developments to help fund transport improvements

We've also considered

- How to plan for the future if the Bakerloo line extension is not delivered, or arrives later than expected.
- If the regeneration of Catford major centre can be delivered without re-routing the South Circular.
- Using London Plan parking standards, but using a local approach for car-free development

Commented [NE665]: Not required for Regulation 19 plan

TR 1 Sustainable transport and movement

A. 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 will be expected to must make the most effective use of land, and optimise the capacity of sites, by taking into account connectivity and accessibility to existing and planned future public transport. Priority should be given to reducing car use and improving opportunitiesboth promoting and enabling for movement by walking, cycling and the use of public transport.

Commented [NE666]: Respond to consultation – more emphasis on promoting and enabling sustainable transport modes

B. Development proposals must aim should seek to improve and must not adversely impact on the effective functioning and safe use of Lewisham's transport network and public realm, including walking and cycling transport infrastructure.

Commented [NE667]: Respond to consultation – clarify that the network includes walking and cycling infrastructure

C. The land, buildings, space and supporting infrastructure required for the construction and operation of Lewisham's network of strategic and other transport infrastructure will be safeguarded, including for the schemes identified in Table 12.1. New Ddevelopment proposals will be required to provide adequate protection for, and respond positively to the need to facilitate the delivery of, the Borough's network of transport infrastructure.

D. To encourage and enable a modal shift away from car use to more sustainable transport modes, as well as to tackle local deprivation by ensuring equality of access to opportunities, the Council will work positively and in partnership with stakeholders to secure improvements to the public transport network including:

   a. Improvements at Lewisham's stations, including enhancements to accessibility and interchange between modes, such as step-free access;

b. Bus priority and bus stop infrastructure; ~~and~~
c. The use of the River Thames for passenger-based transport; and
~~c.~~d. Expansion of cycle hire.

E. ~~Development proposals must contribute to sustaining and creating healthy, liveable and walkable neighbourhoods.~~ Development proposals should use the design-led approach to maximise opportunities to ~~improve the~~ remove barriers to access and introduce measures that encourage and enable movement by walking and cycling~~e environment~~. ~~This will require that careful consideration is given to the~~ They must address the movement and connective function of the public realm~~,~~ along with its place qualities~~, having particular regard~~with reference to Policies QD3 (Public realm and connecting places) and TR3 (Healthy streets as part of healthy neighbourhoods).

Assessing and mitigating transport impacts

F. Transport Assessments, Transport Statements and/or Travel Plans must be submitted with applications for Major development and other development proposals that are likely to impact on the capacity and functioning of the transport network (including ~~the walking and cycling network~~walking and cycling transport infrastructure, deliveries and servicing, and the Bakerloo line extension). These should be commensurate with the nature and scale of development proposed~~,~~ and provide a sufficient level of information for the Council, Transport for London and other relevant authorities to assess applications, and for development proposals to adequately address impacts at the local, network-wide and strategic level where relevant.

G. Development proposals that do not comply with (B) and (C) above, or otherwise prohibit or prevent the necessary and safe functioning of Lewisham's transport infrastructure and network, will be refused unless it can be demonstrated that adverse impacts will be avoided or appropriately mitigated. Proposals ~~will be expected to~~must deliver direct mitigation measures, with suitable alternative provision that is agreed by the relevant transport authorities and service providers, including Transport for London, and/or planning contributions, where appropriate.

H. Development proposals will be assessed having regard to the cumulative impact of development~~,~~ including within Lewisham and neighbouring local authority areas.

I. Where there are identified capacity issues with respect to the additional travel demand expected to be generated by new development proposals, planning permission will be contingent on the provision of the necessary public transport and/or walking~~/~~ and cycling infrastructure to cater for this demand, in line with ~~draft~~ London Plan Policy T4~~.D~~ (Assessing and mitigating transport impacts). Consideration will be given to both existing and planned transport infrastructure, taking into account timeframes and funding committed for any future schemes. The Council will use measures to ensure that development is appropriately phased~~,~~ in order to avoid excessive strain on the transport network and to ensure additional infrastructure demands arising from the development (including for community and

Commented [NE668]: Respond to consultation – TfL request for addition of this scheme

Commented [NE669]: Repetition – captured in A above and elsewhere in the plan

Commented [NE670]: Respond to consultation – request for these additions

Commented [NE671]: Respond to consultation – clarification to aid policy implementation

green infrastructure) can be appropriately accommodated.

Table 12.1 – Indicative list of strategic transport schemes

Scheme	Timeframe
Public transport	
Bakerloo line extension	Medium
Lewisham Station and interchange	Short to medium
Brockley Station and interchange	Medium
Surrey Canal Road Station	Short to medium
~~New Cross to Lewisham Overground extension~~	~~TBC~~
'Metroisation' of London Overground services	Short to medium
Healthy streets and active travel	
A2 New Cross Road / Amersham Gyratory removal	Short
A21 Healthy Streets Corridor ('Lewisham Spine)	Short to medium
A205 (South Circular) Re-routing (Catford)	Short
Ringway Corridor (Southend Land and Whitefoot Lane)	Medium
Healthy Neighbourhoods	Short to medium

Commented [NE672]: Respond to consultation - removed at request of GLA/TfL who do not support the scheme at this time

Figure 12.1: Public Transport Accessibility Levels

Explanation

12.1. An effective, resilient and safe transport network is necessary to ensure equality of access to opportunities for people in Lewisham ~~residents~~ and to facilitate Good G~~g~~rowth ~~in an efficient and sustainable way~~. The integration of land use and transport is an important consideration both at the strategic Borough-wide and ~~individual~~ site level. The Local Plan ~~aims to~~ support~~s~~ ~~delivery of~~ the London Mayor's Transport Strategy, the Council's Transport Strategy and Local Implementation Plan and the Lewisham Cycle Strategy by seeking to ~~rebalancing~~ rebalance the transport system away from car use and towards more sustainable transport modes. This policy sets out our approach to facilitate this 'modal shift' so that Lewisham contributes to the achievement of the ~~draft~~ London Plan target for 80 per cent of all journeys in London to be made by walking, cycling or public transport by 2041; as in inner-London borough, Lewisham's modal shift target is 90 per cent. The policy also forms part of our response to the c~~C~~limate e~~E~~mergency as a means to significantly reduce greenhouse gas emissions locally, along with tackling the associated issues of poor air quality and noise.

Commented [NE673]: Respond to consultation – request that Council's relevant key plans and strategies signposted

12.2. There is an uneven distribution of public transport provision in the Borough ~~particularly in terms of public transport~~. Neighbourhoods around New Cross, Deptford, Lewisham and Catford are generally well served by rail and bus transport. A high concentration of stations link to frequent services on the Docklands Light Railway (DLR), National Rail and London Overground networks. However, other parts 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. This situation, combined with the uneven distribution of public transport infrastructure, has contributed to a greater reliance on car use in some areas.

12.3. Investment in transport infrastructure is necessary to support the levels of ~~planned~~ growth planned within the Borough ~~over the plan period,~~ as well as to substantially increase the proportion of journeys being made by walking, cycling and public transport. An indicative list of strategic transport schemes is set out in Table 12.1. These schemes have been signposted as they ~~are critical to~~will play a key role in supporting the delivery of the spatial strategy for the Borough. However a wider complement of ~~investments and interventions~~ transport projects are also needed to address the ~~distinct~~ accessibility issues in local areas. This list should therefore be read together with Lewisham's Transport Strategy and Local Implementation Plan, Lewisham's Infrastructure Delivery Plan and Table 10.1 in the ~~draft~~ London Plan[151]. Whilst the delivery of the spatial strategy is not dependent on t~~T~~he Bakerloo line extension ~~to Hayes and interchange upgrades at Lewisham and Brockley stations are noteworthy as they~~ are the scheme will play a vital ~~to~~ role in supporting growth and regeneration, particularly in the Opportunity Areas and the Bell Green and Lower Sydenham area. ~~ensuring the development capacity of sites is optimised, and to~~ It will also help to address~~ing~~ the increase in passenger demand arising from London's growth. Further details are set out in Policy TR2 (Bakerloo line extension).

12.4. We will work proactively with key stakeholders (including the Greater London Authority / Transport for London and Network Rail) along with landowners and development industry partners to deliver new and improved transport infrastructure. This includes safeguarding the land, sites, buildings, space and associated infrastructure required to facilitate the construction and safe operation of Lewisham's transport network. Development proposals will be required to provide adequate protection for, and respond positively to the need to facilitate, strategic and other transport ~~schemes~~infrastructure.

12.5. High quality public realm underpins the integrated approach to land use and transport. By improving the public realm and making places and streets well-connected, greener, safer and more accessible, we aim to encourage and better enable movement by ~~sustainable modes~~walking, cycling and public transport. ~~Development proposals will be expected to consider public realm at the early stage of the design-led approach, having regard to Policies~~ Further details on public realm are set out in Policies QD3 (Public realm and connecting places) and TR3 (Healthy streets as part of healthy neighbourhoods). ~~High quality public realm will be integral to increasing the number of trips made by walking, cycling and public transport, which in turn has the potential to lead to improved health outcomes, including through uptake in physical activity and improved air quality.~~

Assessing and mitigating transport impacts

12.6. It is important that ~~opportunities are taken to~~new development avoids and/or mitigates any potential adverse impacts on the transport network. In order to ensure that impacts are appropriately ~~considered~~ identified and addressed through the planning process, development proposals will be required to include a Transport Assessment, Transport Statement and/or Travel Plan, where appropriate. The information should be sufficiently detailed and accurate to allow

Commented [NE674]: Respond to consultation – removed for clarification

Commented [NE675]: Repetition – already set out in policy and covered elsewhere in plan

Commented [NE676]: Repetition – covered elsewhere in plan

[151] London Plan (2021) Table 10.1 provides an indicative list of transport schemes across London.

for the clear identification and assessment of specific impacts and to inform any necessary mitigation measures.

12.7. Transport Assessments should be undertaken in line with relevant good practice guidance, including that published by the Greater London Authority / Transport for London. Transport modelling may be required to demonstrate that a proposal will not result in any adverse impacts, either individually or cumulatively in combination with other development. Healthy Streets Assessments must be included as part of the Transport Assessment for major development proposals, in line with Policy TR3 (Healthy streets as part of healthy neighbourhoods). Where new or improved public realm is proposed within or around open spaces and biodiversity sites, this must be sensitively integrated to ensure that there will be no adverse impact on the environment.

12.8. Travel Plans must reflect the Local Plan priority given to supporting and enabling sustainable transport modes, including active travel along with use of public transport. They should address the accessibility requirements of all likely users of the development, taking into account the needs of disabled people and others with specialist mobility requirements.

Figure 12.2 Proposed Bakerloo line route and potential stations

TR 2 Bakerloo line extension

A. The Bakerloo line extension is fundamental to improving public transport accessibility and as well as supporting strategic growth and regeneration objectives in Lewisham and southeast London. The Council will work in partnership with stakeholders to secure the timely delivery of the BLE, in accordance with the draft London Plan. It will also seek to maximise the opportunities associated with the BLE by directing new investment to significantly improve accessibility across the Borough, tackle deprivation and optimise the development potential of local areas and sites in proximity to the BLE.

B. Development proposals will be required tomust demonstrate that they will facilitate and not preclude the delivery of the Bakerloo line extensionBLE, having regardwith reference to Ppolicies TR1.C and TR1.D (Sustainable transport and movement). They must take into account taking into account Ministerial safeguarding Directions and relevant Mayor of London / Transport for London infrastructure requirements and/or feasibility studies associated with BLE, and should consult with relevant transport bodies at the early stage of the planning process;

C. 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 Bakerloo line extensionBLE, and will 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

Commented [NE677]: Respond to consultation – signpost policies on green infrastructure here as a key consideration

Commented [NE678]: Respond to consultation – to reflect that BLE Phase 2 route has not been confirmed and only Phase 1 currently benefits from the Safeguarding Direction

Commented [NE679]: Respond to consultation – GLA/TfL request for wording to strengthen policy

by ~~its~~ the introduction of the BLE into the local area. This may include provision for new or improved public realm and transport infrastructure enhancements.

D. Development proposals should optimise the use of land and capacity of sites taking into account the ~~Bakerloo line extension~~BLE and future improvements to Public Transport Access~~ibility~~ Levels enabled by its delivery. The Council will seek to ensure that development on sites in proximity to existing, planned or potential future Bakerloo line stations is appropriately phased in order to secure the most beneficial use of land, particularly to help meet Lewisham's housing needs., ~~including by implementing Policy TR1.H (Sustainable transport and movement).~~

Explanation

12.9. Despite its inner-London location Lewisham does not currently benefit from direct access to the London Underground network. However, the ~~draft~~ London Plan commits to extend the Bakerloo line from Elephant and Castle to Lewisham and beyond. We will continue to advocate and plan positively for the extension of the Bakerloo line ~~through Lewisham to Hayes~~. This strategic transport scheme will improve connectivity, increase the capacity and resilience of the transport network in London., It will also contribute to the delivery of Good Growth in Lewisham by encouraging and enabling ~~as well as support~~ modal shift ~~in the Borough~~ which in turn can contribute to reducing carbon emissions and improving air quality.

Commented [NE680]: Respond to consultation – refer to wider sustainability benefits of BLE

12.10. The Secretary of State has made formal safeguarding Directions for the Bakerloo line extension which will support the project in safeguarding sites and routing alignment. The Bakerloo line extension will make a higher number of homes possible within the existing Opportunity Area and that proposed at Bell Green/Lower Sydenham. As such, the extension is a catalyst for change, providing an opportunity to enhance the transport offer at Lewisham town centre which will support and enable growth while also enhancing the public realm and connectivity. At Lewisham, it will also provide an improved strategic public transport hub with improved National Rail and DLR stations and bus services. The Directions require the local planning authority to consult TfL on planning applications within the safeguarding zone'. A map of the safeguarding Direction area is included on the Policies Map. There is not currently a safeguarding Direction for Phase 2 of the BLE (i.e. the phase extending south beyond Lewisham station) as this phase is in the design and feasibility stages. Applicants should consult the Mayor of London and TfL at the early stage of the planning process for the latest information on infrastructure requirements for the BLE. Where the preferred route is not confirmed, feasibility studies can be helpful to provide an indication of land or sites that may be essential to enable the delivery of the BLE.

~~12.10.~~12.11. The Bakerloo line extension is critical to the achievement of our growth and regeneration objectives. The ~~extension~~ BLE will assist in addressing the existing inequality in access to public transport, particularly in the Borough's southern area where ~~we have~~there is a designated ~~a~~ Strategic Area for Regeneration. The ~~extension~~ BLE will also play a vital role in stimulating inward investment ~~in~~and helping to unlock the development potential of ~~strategic~~ sites,

including those ~~sites~~ around stations and within areas along its route. For example, it will incentivise landowners to assemble and bring forward sites for redevelopment and help to ensure the optimal use of land, including higher density development in highly accessible areas. ~~In addition, T~~the scheme could potentially enable a future London Plan Opportunity Area designation in the Bell Green and Lower Sydenham area. The BLE Local Economic Impact Assessment (2020) sets out some of the key benefits this project offers for Lewisham and southeast London.

~~12.11.~~12.12. Given the expected transformative effects of the ~~Bakerloo line extension~~BLE it is important that new development helps to facilitate and does not preclude its delivery. This includes the safeguarding of land and buildings required for the construction and operation of the extension, including for its route, stations, portals, ventilation shafts and other operational functions. The nature and phasing of new development close to the route alignment or sites required for stations or construction has the potential to impact upon the deliverability of the scheme. Development p~~P~~roposals within 400 metres (approximately 5 minutes walking distance) of a proposed Bakerloo line station will be heavily scrutinised and must demonstrate how they will ensure that development will not prejudice the scheme's delivery, and responds positively to its introduction in the locality. This includes transport and public realm measures to enhance legibility and access to the station and the surrounding area by all sustainable modes of travel. Where the 400 metres zone extends into neighbouring Boroughs the relevant Local Planning Authority should be consulted on relevant policy requirements.

~~12.12.~~12.13. Development proposals should optimise the use of land and capacity of sites taking into account the ~~Bakerloo line extension~~BLE and future improvements to Public Transport Access~~ibility~~ Levels enabled by its delivery. A pragmatic and carefully managed approach to site development will be required. This is in order to ensure that new development contributes to the delivery of sustainable neighbourhoods and communities, with density levels that are appropriate to the site context, including public transport accessibility and local area character. For M~~m~~ajor development proposals and development proposals delivered comprehensively through the masterplan process, we will seek to ensure that development is appropriately phased. Planning conditions may be applied to ensure that all or particular elements of a scheme proceed in a certain sequence. This includes the use of Grampian conditions.[152] The Council will continue to liaise with landowners on a site and area-wide basis to understand their aspirations for landholdings, any redevelopment plans and the timing for this. Planning permission may be contingent on the provision of the necessary infrastructure to cater for additional demand arising from the scheme, in line with the Policy TR1~~.H~~ (Sustainable transport and movement) and ~~draft~~ London Plan Policy T4~~.D~~ (Assessing and mitigating transport impacts).

Commented [NE681]: Respond to consultation – clarification on how BLE can unlock development

Commented [NE682]: Respond to consultation- neighbouring borough request for additional text

Commented [NE683]: Respond to consultation –further details requested on how phasing will be achieved and managed

[152] This refers to conditions which prohibit development authorised by the planning permission or other aspects linked to the planning permission (e.g. occupation of premises) until a specified action has been taken (such as the provision of supporting infrastructure). Further details are set out in the National Planning Practice Guidance. Paragraph: 009 Reference ID: 21a-009-20140306.

Figure 12.3: Bakerloo Line Extension map

Figure 12.4: Strategic walking and cycling routes

TR 3 Healthy streets as part of healthy neighbourhoods

A. The Healthy Streets Approach will be promoted and implemented in Lewisham in order to support the delivery of inclusive, healthy, safe, liveable, walkable and sustainable neighbourhoods. Priority will be given to approaches and measures that encourage and ~~help to improve the~~ enable movement by walking, ~~and~~ cycling ~~experience, along with travel by~~ and public transport~~, including high quality public realm~~, so they become people's preferred choice of travel in Lewisham.

B. Development proposals ~~will be required to~~must demonstrate how they have ~~considered and~~ applied the ~~draft~~ London Plan Healthy Streets Approach and Indicators through the design-led approach. All major development proposals ~~will be required to~~must submit a Healthy Streets Assessment as part of the Transport Assessment. Proposals will be supported where they have engaged positively with the Healthy Streets Approach ~~through the design-led approach~~ to deliver public realm and other improvements that support walking, cycling and the use of public transport. Cycle infrastructure must be designed in accordance with the London Cycling Design Standards.

C. The Healthy Streets Approach will ~~be given particular priority~~have particular importance within town centres, along and around Growth Corridors and other key movement corridors that link Lewisham's neighbourhoods and town centres with each other and those outside of the Borough. This includes corridors located in areas with lower ~~levels of~~ Ppublic Ttransport Aa~~c~~cessibility Levels and~~/or~~ areas experiencing higher levels of deprivation. Development proposals must have regard to relevant guidance that supports corridor improvements, including the Council's A21 ~~Design Guidance SPD~~Development Framework.

D. Development proposals ~~should~~ must safeguard and contribute to maintaining and enhancing the Borough's network of walking routes and ~~cycling routes~~cycleways, including the ~~strategic routes of the~~ Thames Path, South-East London Green Chain, ~~and the~~ Waterlink Way~~, along with Cycle Superhighways and Quietways~~ and other components of the Lewisham Links. Opportunities to enhance connections between existing and proposed future routes should be investigated and implemented wherever appropriate and feasible, including the expansion of cycle hire along these routes. Development p~~P~~roposals that adversely impact on the safety, quality and convenience of the Borough's network of walking routes and ~~cycling routes~~cycleways, and associated infrastructure (including dedicated cycle parking provision), will be ~~strongly resisted~~refused unless appropriate mitigation measures are provided.

E. High quality public realm is integral to the delivery of the Healthy Streets Approach. In line with Policy QD 3 (Public realm and connecting places) development proposals must be designed to maximise the contribution that public realm makes to encourage and enable active modes of travel. This includes measures to reduce vehicle

Commented [NE684]: Respond to consultation – plan should be more proactive and positive in encouraging modal shift, not just encourage but 'enable' in line with London Plan

Commented [NE685]: Respond to consultation – request that the London Cycling Design Standards are embedded in the plan

Commented [NE686]: Respond to consultation and information session feedback – to clarify that the healthy street approach applies to all streets; policy continues to reflect that this will have particular significance on key corridors where significant growth is planned and where development can deliver improvements directly on site

Commented [NE687]: Terminology updated to reflect term 'cycleways' in line with London Plan and Mayors Transport Strategy

dominance and enhance ~~site~~ access, permeability and connectivity to and within sites by maintaining or integrating safe and legible routes for walking and cycling along with removing barriers to movement, such as gates, guardrails and stepped kerbs.

F. To support the Healthy Streets Approach~~,~~ development proposals should provide end-of-trip facilities for cyclists that are ~~accessible~~ easy to access and designed ~~to a high quality~~in accordance with the London Cycling Design S~~s~~tandards. These facilities should be provided at a level that is commensurate with the nature and scale of development and the required level of cycle parking, in line with the parking standards of Policy TR4 (Parking).

G. To help facilitate liveable and sustainable neighbourhoods in Lewisham, the Council will work with stakeholders and local communities to investigate the feasibility of, and implement where appropriate, traffic management and other measures to improve the quality and amenity of residential areas. This may include interventions to reduce, re-route or calm vehicular traffic (particularly around schools and other community facilities) and/or lower speed limits in localities, as well as to enhance the quality and safety of the walking and cycle environment.

H. Development proposals ~~should~~ must be designed to ensure that the public realm is not adversely impacted by installations, including advertising columns, and seek opportunities to remove redundant installations wherever possible~~, in line with Policy QD3 (Public realm and connecting places)~~.

~~H.~~I. To help facilitate modal shift the Council will work positively with its partners and stakeholders to raise awareness of active travel and to enhance opportunities for the public to access related training and funding.

Explanation

~~12.13.~~12.14. The Healthy Streets Approach is set out in the ~~draft~~ London Plan and underpins the ~~its objectives for achieving '~~Good Growth' policies. It will be strongly supported in Lewisham in order to achieve a significant step-change away from car use to ~~more sustainable transport modes such as~~ walking, cycling and the use of public transport. Key projects and initiatives that will support t~~T~~he Healthy Streets Approach ~~is reflected~~are included in Lewisham's Transport Strategy and Local Implementation Plan and Infrastructure Delivery Plan.~~, which includes a number of objectives that will guide implementation of the Healthy Streets Approach locally and which are given effect through the Local Plan.~~

~~12.14.~~12.15. ~~Everyone should benefit from safe and convenient access to public transport, local services, community facilities, education, training and employment opportunities. Through~~ Guided by the Healthy ~~Neighbourhood~~ Streets Approach and its associated 'Indicators' we will work with stakeholders and development industry partners to deliver a wide range of public realm improvements. Together these ~~should~~ will contribute to making Lewisham's neighbourhoods more liveable and its streets safer, greener, ~~and~~ less polluted, more legible and accessible to all.

Commented [NE688]: Respond to consultation – these standards should be referred and applied

Commented [NE689]: Repetition

Commented [NE690]: Respond to consultation – to reflect other ways in which the council can promote modal shift

Commented [NE691]: Deleted for clarity – transport is implicit healthy streets approach

Commented [NE692]: Reflected more concisely in 'liveable' neighbourhoods concept, which is included as new insertion within paragraph

~~A key guiding principle is to ensure that~~Development proposals should give priority ~~is given~~ to movement by walking and cycling~~, making~~ in order to make active travel a more attractive option for people to move throughout the Borough.

~~12.15.~~12.16. Lewisham's population ~~will~~ is expected to continue to increase in the context of London's growth. Maintaining the current levels and high proportion of journeys made by car is not efficient or sustainable. Many of London's streets are already heavily congested and the road network has limited capacity to absorb further increases in the number of vehicles. In response to this situation, we will seek to deliver a more efficient and effective use of land. This includes ~~and~~ rebalancing road space by promoting travel by walking, cycling and public transport.

Figure 12.5 Healthy Street Wheel (Lucy Saunders)

~~12.16.~~12.17. ~~In the local context, Lewisham's southern areas currently have the highest levels of dependency on car use for personal travel. This is due to the comparatively low levels of public transport accessibility along with limited opportunities for active travel on high quality walking and cycle routes. The Local Plan places a particular focus on key strategic corridors that can better link the Borough's neighbourhoods with each other.~~ The Healthy Streets Approach will apply to all streets in the Borough. However to support the spatial strategy the Local Plan emphasises the need for public realm improvements in key locations, such as town centres, along and around Growth Corridors, within areas experiencing higher levels of deprivation and those with low Public Transport Access Levels. This includes the A21 Corridor which has the potential to significantly improve north to south connections ~~in the Borough,~~ and encourage multi-modal journeys by linking walking routes and cycleways ~~routes~~ with bus and rail services. Similarly, public realm improvements along the Ringway Corridor (Southend Land and Whitefoot Lane), New Cross Road / A2 and South Circular (A205) can help to improve orbital movements east to west. In addition to ~~the strategic~~Growth C~~c~~orridors it is imperative that there is good connectivity within and between town centres, along with improved access to community facilities and public transport nodes. Development proposals should support the delivery of a fully integrated active travel and public transport network in Lewisham, with good linkages to neighbouring Boroughs and wider London.

Commented [NE693]: Re-phrased for clarity

Commented [NE694]: Respond to consultation – clarification about where Healthy Streets Approach applied

~~12.17.~~12.18. High quality and effectively managed public realm is integral to the successful delivery of the Healthy Streets Approach. ~~All development proposals will therefore be considered in line with the detailed requirements of~~ This policy will work together with Policy QD3 (Public realm and connecting places). Development p~~P~~roposals ~~should seek to~~must identify and ~~positively address~~ proactively respond to issues of severance, ~~and~~ poor connectivity, amenity and pollution (including air quality) to support the creation of healthy, attractive, vibrant and accessible ~~urban environments~~neighbourhoods and places. By transforming the quality of ~~our~~ streets and other elements of the public realm, we also aim to encourage people to spend more time in public spaces~~.~~ ~~which~~ This can in turn~~, can~~ provide more opportunities for recreation and socialising~~, and~~ as well as help to support the vitality and viability of town centres and other places.

~~12.18.~~12.19. By referring the Indicators of the Healthy Streets Approach, and the London Mayor's relevant guidance, development proposals should demonstrate how buildings, including their main access points, ~~positively interface~~create a positive relationship with the street and help to improve local area amenity. Proposals should explore options to increase widths to footpaths~~,~~ and ~~building~~ design~~s~~ buildings ~~that provide~~with vehicular access sited away from adjoining street junctions. Where such interventions cannot feasibly be delivered~~,~~ planning contributions may be sought for public realm enhancements to help mitigate impacts.

~~12.19.~~12.20. Improving safety on Lewisham's roads is also a key objective of this policy. ~~Interventions that~~Where priority~~ise~~ is given to safe movement by walking and cycling, ~~and which may consequently impact on~~there is a greater likelihood of reducing car use ~~and~~ as well as the dominance and speed of vehicles ~~movement (such as by reducing~~ speeds~~), are necessary to realise modal shift~~. This approach will support the Mayor of London's 'Vision Zero' strategy of eliminating all deaths and serious injuries on the London transport network from all road collisions by 2041.

~~12.20.~~12.21. Addressing the current high levels of inactivity amongst Londoners is a key focus of the Healthy Streets Approach. According to data cited in the London Plan, currently only 34 per cent of adult Londoners report having walked or cycled for two ten-minute periods on the previous day. This lack of activity is a cause of many of public health issues, including Type 2 diabetes, colon cancer, coronary heart disease and depression. Implementation of this policy within the Borough will deliver people-oriented infrastructure (such as street furniture, landscaping, and cycle parking) to encourage active travel, improving the health of our local communities over the long-term.

TR 4 Parking

A. ~~Development proposals should be designed to promote and enable safe movement by walking, cycling and the use of public transport.~~ A carefully managed approach to parking ~~provision~~, and particularly car parking, will be taken ~~recognising the varying levels of access to public transport across Lewisham. Proposals should seek to reduce car use to support the Local Plan's strategic objectives~~ to support the delivery of inclusive, healthy, safe, ~~and~~ liveable and sustainable neighbourhoods~~, including by significantly reducing air pollution and greenhouse gas emissions~~. 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,

B. Development proposals for car-free development will be supported where they are located in highly accessible and well-connected locations. Elsewhere, car-free development will ~~only~~ be supported where it can be suitably demonstrated that:
   a. The development is appropriately located at a well-connected ~~and accessible~~ location with good walking and cycling access to local amenities and services; or
   b. The development is appropriately located within an Opportunity Area, Growth Node, Regeneration Node, Growth Corridor or town centre where the Local Plan makes provision for significant public realm enhancements that will bring

Commented [NE695]: Respond to public consultation - This policy has been amended throughout to ensure conformity with the London Plan and to respond to requests to raise the profile of, and strengthen policies on cycling provision

Commented [NE696]: Repetition – this is covered in Policy TR1 Sustainable transport and movement and TR3 healthy streets

Commented [NE697]: Repetition – this is covered elsewhere in the plan

about attractive conditions for walking and cycling and improve access to local amenities and services; and

c. There ~~development is located within~~ is an existing Controlled Parking Zone (CPZ), or ~~it can be demonstrated that there is no capacity on the existing local road network to accommodate the parking demand generated by the development~~a future CPZ can be established through planning contributions;

d. There is sufficient capacity on the public transport network or potential for active travel interventions or implementation of Low Traffic Neighbourhoods in the local~~ity~~ area to cater to the additional demand arising from the development, taking into account existing and planned transport infrastructure;

~~and~~

e. ~~There will be no adverse impact on existing provision of on-street parking~~;

~~A.~~C. ~~The design of parking provision and the amount of spaces provided in new development should respond to the need to ensure safe and convenient access for all users, and also reflect the priority given to encouraging active modes of travel and use of public transport.~~ Development proposals ~~will be assessed against, and should~~must not exceed the maximum car parking ~~requirements and~~ standards set out in ~~draft~~ the London Plan, including for:

~~a. Residential and non-residential disabled persons parking;~~

~~b. Cycle parking, with the higher minimum standards applying in Lewisham;~~

~~c. Car parking;~~

~~d.~~a. Residential parking;

~~e.~~b. Office parking;

~~f.~~c. Retail parking; and

~~g.~~d. Hotel and leisure uses parking (including consideration of coach parking).

~~B. When assessing proposals against (B) above, consideration will be given to existing and future planned Public Transport Accessibility Levels, along with the existing provision of step-free access at stations.~~

D. Development proposals must make adequate provision for residential and non-residential disabled persons parking, recognising that car-free development has no general parking but should still provide disabled persons parking. All such provision must be in accordance with the relevant London Plan standards and the requirements for design and management of parking bays.

~~C. Where development proposals for housing require the provision of parking, the design and allocation of space for occupants should be considered in line with the following sequential approach~~

~~a. Disabled persons parking and access arrangements.~~

~~b. Cycle parking and associated end-of-trip facilities.~~

~~c. Car share or car club parking.~~

~~d. Family dwelling car parking~~

~~e. Other occupant parking~~

~~f. Visitor parking.~~

E. Development proposals must make provision for high quality and fit-for-purpose cycle parking in accordance with the London Cycle Design Standards. They must meet and wherever possible seek to exceed the minimum cycle parking standards set by London Plan (which for Lewisham are the 'higher minimum' standards). This includes sufficient provision of short and long-stay spaces along with spaces to accommodate larger cycles including adapted cycles for disabled people and cargo bikes.

Commented [NE698]: Respond to consultation – London Plan conformity and request for London Cycle Design Standards to be given effect in the plan

~~D.~~F. Major development proposals, development proposals located within town centres and employment ~~locations~~areas, ~~-~~or other developments likely to generate a significant number of visitors should ~~investigate opportunities to~~ integrate dedicated space for cycle hubs to accommodate provision of cycle parking including for cycle hire schemes~~, as well as~~ and space for cargo bikes wherever feasible. Proposals for the comprehensive development of sites, including through masterplans, must demonstrate how they have maximised opportunities to deliver this provision in order encourage and enable cycling.

~~E.~~A. ~~Development proposals for car-free development will be supported where they are located in highly accessible and well-connected locations. Elsewhere, car-free development will only be supported where it can be suitably demonstrated that:~~

- ~~a. The development is appropriately located at a well-connected and accessible location;~~
- ~~b.~~a. ~~The development is located within an existing Controlled Parking Zone (CPZ), or it can be demonstrated that there is no capacity on the existing local road network to accommodate the parking demand generated by the development;~~
- ~~c.~~a. ~~There is sufficient capacity on the public transport network in the locality to cater to the additional demand arising from the development, taking into account existing and planned transport infrastructure; and~~
- ~~d.~~a. ~~There will be no adverse impact on existing provision of on-street parking;~~

Commented [NE699]: Moved to B above.

~~F.~~G. The Council will consider the need for Controlled Parking Zones to manage additional or new demand arising from development across the Borough, and will implement these where appropriate.

~~G.~~H. In order to manage the parking demand associated with new development~~,~~ the Council will consider on a case-by-case basis~~,~~ whether it is appropriate to require that the development is Permit Free (except for Blue Badge holders). Proposals for new car-free development must be Permit Free.

~~H.~~I. Where car parking is appropriate, a~~A~~ minimum of 20 per cent of total car parking spaces provided on-site ~~are to~~must have active provision of ~~electric~~ charging points for electric or Ultra-Low Emission vehicles, with ~~a minimum of a further 40 per cent designed with the cabling prepared for future use~~passive provision for all remaining spaces. In the case that a development has a Travel Plan in place, the levels of usage of electric or Ultra-Low Emission vehicles should be monitored, with new charging points installed as demand increases.

~~I.~~J. Parking Design and Management Plans (PDMPs) ~~will be required to~~must be submitted with ~~applications for Major development and other~~development proposals that include parking. PDMPs must also be submitted for development proposals

without parking but which are likely to generate a significant demand for parking or impact on existing parking provision. ~~This includes parking provision for large public and community facilities, including for sport, leisure and recreation uses. Cycle parking provision should be considered by Parking Design and Management Plans.~~

K. Development proposals for residential and commercial uses will be expected to investigate opportunities to implement rapid ~~electric vehicle~~ charging points, having regard to the Council's Low Emissions Vehicle Charging Strategy.

~~J.~~L. Surface-level car parking should be designed to be permeable, with reference to Policy SD8 (Sustainable drainage),

Explanation

12.21. ~~When considering the level of parking provision for new development, we will apply the draft London Plan parking standards, as set out in Policy T5 (Cycling) and T6 (Car parking), taking into account the car parking standards for different types of land uses. Development proposals will be expected to refer the London Plan for further information on the requirements in this respect. Where development proposals for housing require the provision of parking, the allocation of spaces should be provided having regard to the sequential approach set out in TR4.D however recognising that types 3,4,5 and 6 may not be necessary or appropriate in all cases.~~

12.22. An effective and well-functioning road network is essential to supporting local businesses and London's economy, the resilience and efficiency of emergency services and the public transport network. As the population grows the road network will not be able to absorb the additional cars that would result from continued levels of car ownership and use. In order to achieve the Local Plan's strategic objectives and the London Mayor's objective for 90 per cent of journeys in inner-London to be made by walking, cycling and the use of public transport, parking must be carefully managed and controlled. Reduced car parking provision together with improved walking and cycling infrastructure can support the creation of places that are designed for people rather than vehicles.

12.23. The London Plan parking standards will be applied including the maximum standards for car parking. The London Plan makes clear that 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. Elsewhere, developments should be designed to provide the minimum necessary car parking (car-lite).

~~12.22.~~12.24. ~~When assessing proposals against the parking standards, we will take into account the presence of step-free access at stations.~~ Whilst some areas of the Borough may benefit from high Public Transport Access~~ibility~~ Levels, the lack of step-free access at stations can significantly constrain travel options and access for some users. We will ~~therefore take a carefully managed approach to parking provision where stations are in proximity to, and likely to be servicing, new developments~~continue work with key stakeholders, such as Transport for London and Network Rail, along with development industry partners to address ~~do not~~

Commented [NE700]: Removed – this is not a definitive list and is not considered to be helpful; this will need to be considered on a case-by-case basis

Commented [NE701]: Deleted as the PDMPs must address all types of parking, not just car parking

Commented [NE702]: Amended to 'future proof' and provide flexibility for different types of technologies

Commented [NE703]: Supporting text amended throughout to align with policy changes

~~currently benefit from~~ step-free access and~~/or there are no immediate funding commitments to~~ deliver this provision ~~by the time of the development's occupation~~ which is necessary for inclusive and well-connected neighbourhoods.

~~12.23.~~12.25. ~~New d~~Development ~~will be expected to deliver and help to facilitate~~proposals must be designed to encourage and enable movement by walking and cycling. This will require that careful consideration is given to the design of public realm~~, as discussed elsewhere in this section,~~ along with the provision of high quality and dedicated facilities for cyclists, including easily accessible, safe and secure cycle parking, taking into account the need to accommodate cargo-bikes. ~~Applicants are minded to note that for cycle parking, Lewisham is identified in the draft~~ London Plan Policy T5 (Cycling) provides that Lewisham ~~a~~is a borough where the 'higher minimum' cycle parking standards apply.

Commented [NE704]: Respond to consultation – signpost consideration and support for cargo bikes as part of cycle provision

~~12.24. Whilst we are broadly supportive of car-free or car-capped development, it is important that this type of development is appropriately managed. This will ensure there is no adverse impact on the highway network and local amenity. Car-free or car-capped development will only be acceptable in principle where the development is located within a highly accessible location and within an area where there is an existing Controlled Parking Zone. Consideration will be given to proposals where it can be demonstrated that a new CPZ will be in place by the time of the occupation of development. In addition, there may be some circumstances where car-free development is not acceptable, for instance, to ensure the needs of Blue Badge holders are suitably accommodated.~~

~~12.25.~~12.26. Cycle hire schemes are becoming an increasingly attractive, convenient and cost-efficient option for people to make part or all of their journeys by cycling. There are a number of schemes within the Capital with different operational requirements, ranging from dedicated docking stations to 'remote collection and drop-off', which are aided by new technology. To encourage cycling we are broadly supportive of these schemes, whilst recognising spaces do not count towards the cycle parking requirement for new development. The use of cycle hire schemes must be carefully managed to ensure that docking stations or cycles do not result in unsightly or hazardous street clutter, or otherwise adversely impact on the public realm, safety and local amenity. We will encourage proposals to investigate opportunities to make provision of dedicated space to accommodate cycle hubs and cargo bikes, so that they can be sensitively integrated into the site and neighbourhood. This is particularly for major development proposals, proposals within town centres and employment locations or those which are likely to attract a significant number of visitors (for example, cultural or education facilities).

~~12.26.~~12.27. ~~Whilst it is recognised that some residents and commercial uses in less well-connected areas will continue to rely on vehicles, T~~the use of car clubs and electrically charged or Ultra-Low Emission vehicles can provide an alternative to car ownership and conventional gas fuelled vehicles. ~~Their use can help to reduce harmful greenhouse gas emissions and mitigate impacts on climate change. We will therefore encourage d~~Development proposals must ~~to~~ make

appropriate provision for rapid electrical vehicle charging points, ~~wherever vehicle parking is necessary. The Council has prepared a~~ also having regard to the Council's Low Emission Vehicle Charging Strategy, ~~which applicants will be expected to refer. The strategy is targeted at increasing the range of charging options for electric vehicle, including both residential and commercial uses~~. However in light of the climate emergency the use of car clubs and Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through tyre and brake wear and can therefore contribute to poor air quality.

Commented [NE705]: Respond to consultation – supporting text to acknowledge issues around electric vehicles

TR 5 Deliveries, servicing and construction

A. Development proposals should facilitate sustainable freight, where possible, through water, rail, and road ~~and~~ including ~~over the~~for 'last ~~-~~mile distribution~~, cargo bikes~~. They must also facilitate and enable safe, clean and efficient delivery and servicing for all of the ~~site's~~ development's intended occupiers and uses, including emergency services. Delivery and servicing requirements should be considered at the early stage of the design-led approach, particularly in mixed-use ~~schemes~~development, in order to ensure practical site layouts and building designs that protect local amenity and avoid or mitigate adverse impacts to the highway network.

Commented [NE706]: Amended to align with terminology used in London Plan

Commented [NE707]: Typo – cargo bikes signposted in TR4 above

Commented [NE708]: Respond to consultation – emergency services should be flagged

B. Provision of adequate space and facilities for deliveries and servicing should be made off-street, with on street loading bays or other facilities only used where it is demonstrated this is necessary due to feasibility. Major and other l~~L~~arger developments~~, including major residential schemes,~~ should make provision for well-integrated facilities to allow for deliveries to be received outside of peak hours and for secure, temporary storage of parcels or goods.

C. Development proposals for commercial and industrial uses should ensure that parking provision for servicing and delivery is commensurate with the specific operational needs of the development. The level and type of parking provision will be considered on a case-by-case basis with reference to Policy TR4 (Parking)~~. and applicants~~ Proposals must provide evidence to demonstrate that the provision is appropriate to location, nature and scale of commercial or industrial use.

Commented [NE709]: Included for clarity and to aid effective policy implementation

D. Major developments and other development proposals that are likely to generate a significant number of vehicle movements from deliveries, servicing or construction will be required to submit a Delivery and Servicing Plan and/or Construction Logistics Plan as part of the Transport Assessment. This should provide a sufficient level of detail about the servicing, delivery and freight requirements of the development from the construction to occupation stages, and demonstrate that all likely adverse impacts on local amenity and the highway network have been avoided or mitigated, recognising that final details may be sought by condition. Consideration should be given to the timing of deliveries.

E. For ~~larger schemes, including where~~major developments and other developments which ~~sites~~ are to be delivered comprehensively through a masterplan, proposals will be required to prepare and implement a site-wide strategy for deliveries,

servicing and construction. This should support the design-led approach and help to enable coordination and integration of servicing requirements across the site(s). 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.

Commented [NE710]: Respond to consultation – support for shared facilities should be included

Explanation

~~12.27.~~12.28. Freight movement ~~(including for deliveries, servicing and construction)~~ is an important consideration in the planning and design process. ~~At a strategic level, t~~The ~~draft~~ London Plan seeks to facilitate sustainable freight movement by rail, river and road through the consolidation of activities, modal shift and improved coordination in the timing of deliveries. ~~We broadly support these strategic objectives, which are given effect locally through the Local Plan.~~

~~12.28.~~12.29. Careful consideration will need to be given to development proposals involving large-scale freight consolidation and distribution activities. All such proposals should be appropriately located, for example, in Strategic Industrial Locations. ~~.~~ Consideration may also be given to the potential use of existing or proposed piers and structures to support small scale, last-mile distribution. ~~and~~ Proposals must clearly demonstrate how they will ~~positively~~ address sustainable freight movement in the Borough without adversely impacting on the road network, local amenity or the environment. Consolidation and distribution uses should also be commensurate with the role and function of the site or area within which they are located. ~~This is particularly important for employment areas, where our priority is to safeguard land for Class B1 uses to meet identified local needs for workspace.~~

Commented [NE711]: Respond to consultation – Port of London Authority request

Commented [NE712]: Repetition – the Economy and Culture policies provide information on employment land management

~~12.29.~~12.30. To support ~~implementation of the strategic approach to~~sustainable freight, and as part of Lewisham's Transport Strategy, we will explore options and work with stakeholders to make provision for centralised delivery hubs, including secure lockers, in ~~optimal~~ appropriate locations throughout the Borough. This will support our objectives ~~for~~ around traffic reduction and reducing road danger, with consequential benefits in terms of address traffic congestion, poor air quality and noise pollution.

~~12.30.~~12.31. Largely driven by advances in technology, the logistics and freight industry is rapidly shifting to a model of 'last mile' delivery. It is also adapting to changes in consumer behaviour and the rising popularity of home deliveries, including for groceries, other retail items and takeaway meals. These changes have contributed to the prevalence of delivery vehicles on the road network. They have also introduced new challenges for the design of buildings and spaces.

~~12.31.~~12.32. Delivery and servicing requirements for new development needs to be considered at the early stage of the design-led approach. Provision of adequate space and facilities should be made off-street and well-integrated into the site and locality. Larger developments, including residential and mixed-use schemes, have the capacity to generate a significant number of service and delivery trips, which will need to be addressed. Proposals should incorporate delivery receipt and

storage facilities that suit the needs the intended occupiers and uses, include secure storage and where possible, containerised (cold storage). Opportunities should be taken to consolidate or coordinate provision in order reduce the number vehicle movements.

~~12.32.~~12.33. All major development proposals, and other proposals that are likely to result in a significant number of freight movements, including in the construction and operation stages will be required to submit a Delivery and Servicing Plans and/or Construction Logistics Plan. These should be prepared having regard to the latest Transport for London Guidance.

TR 6 Taxis and private hire vehicles

A. Development proposals for offices, taxi ranks, and other operational space associated with taxis and private hire vehicle businesses (including minicabs) will only be supported where:
   a. They are appropriately located, ~~giving~~ with priority given to sites within or in close proximity to town centres and at or near stations;
   b. The development will not result in a harmful overconcentration of similar uses in the locality;
   c. It is suitably demonstrated that there will be no adverse impact on ~~local area~~ amenity and the highway network, including existing on-street parking provision;
   d. Walking routes and cycleways ~~routes~~ will not be ~~impeded~~adversely impacted, particularly where these are used for access to bus stops, station entrances and other public transport services;
   e. The development, ~~including any ancillary facilities,~~ is ~~designed to~~of a high quality ~~standard and well-integrated into local area~~design;
   f. Offices and ranks are accessible and safe during operational hours, including through the use of appropriate lighting and CCTV; and
   g. Parking spaces delivered on-site to meet the operational use of a building (including offices, hotels, community facilities and major public facilities) have active charging points for all designated taxi spaces, in line with the ~~draft~~ London Plan.

B. Development proposals will be assessed having regard to the cumulative impact of facilities for taxis and private hire vehicles in the locality and the ~~draft~~ London Plan strategic target to increase mode share for walking, cycling and public transport to 80% of all trips by 2041, and 90% in inner-London.

Explanation

~~12.33.~~12.34. This policy sets out requirements for new development associated with taxi and private hire vehicle businesses, including minicabs. This type of development is distinguished from the land and facilities used for car clubs or car share services, which are dealt with separately in Policy TR4 (Parking).

~~12.34.~~12.35. ~~Our priority is to~~The Local Plan seeks to deliver inclusive, ~~and~~ healthy liveable and sustainable neighbourhoods by encouraging and ~~helping to facilitate~~enabling active travel and the use of public transport. However, it is recognised that other modes of travel play a role in supporting local residents,

Commented [NE713]: Removed for clarify – where ancillary facilities form part of the development the policy will apply

Commented [NE714]: Removed – there are no standards for such development, but policy retain focus on high quality

Commented [NE715]: Repetition – this is captured in the Design section policies

businesses and visitors, including taxis and private hire vehicles. This travel mode makes up a small proportion of local journeys, around 1 per cent of all trips per day in Lewisham.[153] Yet it is an important part of London's transport network and valuable for a wide range of users. This includes people with reduced mobility who require accessible door-to-door transport services, or who those who do not have access to reliable alternative means of travel, for example, due to the lack of public transport accessibility or infrequent services.

~~12.35.~~12.36. Taxis and minicabs also provide a safe and regulated transport option. They assist people to complete journeys beyond the reach of the bus or train network, or in many cases, provide the only safe and convenient transport option during the early morning, evening and night-time. In addition, the taxi and private hire vehicle industry plays a role in the local and wider regional economy, and is in itself a source of jobs. As of July 2019, there were over 20,000 licensed taxi drivers and 100,000 licensed private vehicle hire drivers registered in London.

~~12.36.~~12.37. A ~~balanced~~ carefully managed approach is therefore necessary to ensure the appropriate management of land for transport functions, including that required for taxis and private hire vehicles. Facilities should ideally be located in close proximity to town centres or train stations where there are compatible land-uses, opportunities for linked trips and where journeys are most likely to originate or end. Proposals will be expected to demonstrate that development will not result in an overconcentration of similar uses in the locality. The cumulative impact of development will therefore be a consideration in the assessment of proposals.

~~12.37.~~12.38. ~~As with all other types of development,~~Development proposals ~~associated with~~for taxis and private hire vehicles must be of a high quality design~~ed to a high quality standard~~. Taxi offices, ranks and other facilities should be appropriately sited and provide all users of the development with good levels of safety and security, including through sensitively integrated lighting and the use of CCTV. It is also important that facilities are designed to be accessible to all. ~~In line with other Local Plan policies, development proposals will be supported where they do not result in adverse impacts on traffic congestion, public safety, amenity and local character.~~

TR 7 Digital ~~and communications infrastructure and~~ connectivity

A. Digital connectivity infrastructure is necessary for access to services and other opportunities, inclusive communities and growth and diversification of the local economy. The Council will work with stakeholders to address barriers to digital access and secure the provision of high quality, fast and reliable digital infrastructure across Lewisham. ~~to support accessible and inclusive communities, as well as to facilitate growth and diversification of the local economy~~.

B. In line with ~~draft~~ London Plan Policy SI ~~1~~6 (Digital connectivity infrastructure) development proposals will be required to take appropriate measures to enable full-fibre, or equivalent infrastructure, connectivity to all end users within new

Commented [NE716]: Repetition – covered elsewhere in plan and addressed in the policy itself

Commented [NE717]: Terminology changed throughout to align with that used in the London Plan

Commented [NE718]: Respond to consultation – To better reflect existing gaps in provision. Also officer addition to reflect that barriers to digital access not necessarily limited to availability of infrastructure

Commented [NE719]: Re-ordered within policy

[153] Lewisham Transport Strategy and Local Implementation Plan 2019-2041. (2019). Information drawn from the London Travel Demand Survey.

development, along with meeting the ex~~ce~~pected demand for mobile connectivity generated by the development. Proposals must demonstrate that the development will be 'connection-ready' on first occupation.

C. Development proposals must demonstrate how they will improve digital connectivity on sites located in areas where full-fibre broadband, or equivalent infrastructure, is not currently available or on sites that are otherwise poorly served by broadband coverage, including in designated employment ~~locations~~areas and town centres. Proposals ~~will be expected to~~must have regard to Lewisham's Infrastructure Delivery Plan and other relevant information on broadband coverage.

Infrastructure and equipment design

D. Development proposals for ~~communications~~ digital connectivity infrastructure and associated equipment will only be supported where it can be suitably demonstrated that:
   a. The infrastructure and equipment is the minimum needed to meet operational requirements, having regard to future demand or planned improvements;
   b. Opportunities for infrastructure and equipment sharing have been fully investigated and taken into account;
   c. There ~~is~~ will be no significant adverse impact on the visual amenity of the occupiers of the host building, where relevant, and neighbouring occupiers;
   ~~c.~~d. There will be no adverse impact on open space and biodiversity;
   ~~d.~~e. If located on a main road or walking route, a minimum residual footway is provided;
   ~~e.~~f. Detrimental impact on the external appearance of the host building or structure, street scene or space on which the equipment is located will be avoided or appropriately mitigated; and
   ~~f.~~g. The infrastructure and equipment is sensitively located and appropriately designed, and does not detract from local area character, having particular regard to:
      i. The need to preserve or enhance the significance of heritage assets, including Listed Buildings and conservation areas;
      ii. The use of design treatments to ensure the least possible visual impact, including colour, landscape and other interventions to help screen or conceal cabling and other apparatus; and
      iii. The cumulative impact of telecommunications installations on a structure, site or area.

E. In order to minimise visual impact all ~~communications~~ digital connectivity infrastructure and equipment should be removed as soon as reasonably practicable once it is not required for use, and older equipment should be upgraded wherever feasible.

Explanation

~~12.38.~~12.39. Digital connectivity~~Communications~~ infrastructure~~, including digital infrastructure,~~ is playing an increasingly important role in the functioning of cities

and society. It is transforming how infrastructure and services are provided, with innovative 'Smart City' technologies that make use of information to deliver more resource and cost efficient provision. It is also helping to facilitate different forms of communication between people as well as enabling more convenient and wider access to goods and services. In addition, digital connectivity infrastructure is important for business and now considered essential to sustainable economic development.

12.39.12.40. Digital connectivity infrastructure also has implications for physical connectivity and the transport network. For example, new technologies are changing the way in which people work and commute, often reducing the need for workers in some industries to travel. The Covid-19 pandemic has accelerated the transition to online and flexible working arrangements. Further, smart technologies are supporting efficiencies in the distribution and logistics sector, with improved timing and coordination in servicing and deliveries. Over time ~~communication~~ these technologies may have significant impacts on the transport network~~,~~ by helping to reduce demand and/or the volume of movements, particularly during traditional peak hours.

12.40.12.41. Digital connectivity infrastructure is ~~considered essential strategic infrastructure and~~ necessary to support ~~more~~ inclusive and sustainable neighbourhoods and communities. Not all areas of Lewisham benefit from the same level of provision ~~of digital and communications infrastructure~~. Premium full-fibre broadband is currently only available in 13 per cent of the Borough~~,~~ and there is very limited availability in the area covering the Lewisham ~~North~~ Creative Enterprise Zone.[154] It is vitally important that full-fibre broadband coverage is provided and enhanced. This is to ensure equality of access to services for people in Lewisham ~~residents,~~ and to support our economic development objectives, particularly to grow the cultural and creative industries. We will therefore work with industry stakeholders and development industry partners to ensure the provision of high quality, fast and reliable digital connectivity infrastructure across the Borough, including full-fibre or equivalent broadband.

Infrastructure and equipment design

12.41.12.42. ~~We are committed to ensuring that local residents, organisations and business are well placed to benefit from modern digital and communications technology. However, it is important that the development of associated infrastructure is appropriately managed. If not carefully sited and designed, infrastructure and equipment can adversely impact on amenity, local character, heritage assets and the functioning of the public realm.~~

12.42.12.43. ~~I~~it is important that ~~the development of associated~~digital connectivity infrastructure is of a high quality design and appropriately managed. ~~If not carefully sited and designed, infrastructure and equipment can~~ This will ensure that development does not adversely impact on amenity, local character, heritage

Commented [NE720]: Repetition – covered above

Commented [NE721]: Moved to paragraph below and re-phrased

[154] London Connectivity, Greater London Authority. Data cited August 2019. https://maps.london.gov.uk/connectivity/

assets, open space and biodiversity and the functioning of the public realm. ~~Communications equipment, including satellite dishes,~~ Development proposals should be sited and designed so ~~they will~~ to avoid or have the least detrimental visual impact~~. It is particularly important that equipment~~ and must respond~~s~~ positively to local character~~,~~ including ~~conservation areas, listed buildings and other designated and non-designated~~ the significance of heritage assets and their setting. ~~In addition to siting,~~ P~~p~~roposals should consider how to conceal equipment by using design treatments including colour, landscaping ~~or other means, such~~ and GRP ~~shrouding~~shrouds or screens. ~~Unless extremely well designed into a building or structure, or disguised from view~~, ~~telecommunications i should not be~~ Development located on a principal street frontage must be well designed and sensitively integrated onto or within a building, structure, or space and disguised from view wherever feasible.

~~12.43.~~12.44. ~~All~~ Development proposals ~~will be expected to~~must demonstrate that they have optimised opportunities to mitigate visual impacts~~,~~. ~~including through~~Applicants should engage~~ment~~ with neighbouring landowners, ~~relevant~~ infrastructure providers and service operators to investigate the feasibility for sharing equipment, such as masts and cabinet boxes. This should include consideration of any planned future improvements necessary to meet the needs of current or future occupiers within a site or area.

~~12.44.~~12.45. The Manual for Streets should be referred for guidance on appropriate residual distances where development is located on a main road. In town centres and other high traffic areas, the minimum residual distance of 1.8 metres may not be sufficient to enable appropriate pedestrian flow, and the minimum width will be determined based on the number of pedestrians per square metre and pedestrian flows per minute.

~~12.45.~~12.46. Digital connectivity~~Communications equipment~~ infrastructure ~~and~~ including supporting structures and equipment (such as masts, cabinet boxes, satellite and other dishes, antennae, cabling, shrouds and stands) should be removed as soon as reasonably practicable once it is not required. This will help to ensure that the quality of townscapes, ~~and~~ streetscapes and public realm are not adversely impacted by unnecessary clutter.

Commented [NE722]: Officer review – considered too prohibitive and could preclude new infrastructure from being delivered. Re-worded below, whilst retaining the main policy intent

Part Three:

Lewisham’s neighbourhoods and places

13 Lewisham's neighbourhoods and places

Figure 13.1: Character areas and neighbourhoods

Celebrating Lewisham's diversity and valuing its distinctiveness

13.1. Lewisham is a diverse Borough comprising many communities of people, neighbourhoods and places, all of which have distinctive identities that should be celebrated and valued. The Local Plan aims to respond to the unique qualities of our communities and neighbourhoods in supporting Good Growth. To achieve the Vision for Lewisham and secure the successful delivery of spatial strategy, new development must respect and contribute positively to Lewisham's local distinctiveness.

13.2. To assist people with understanding and appreciating Lewisham's local distinctiveness, and to establish 'place-based' priorities for guiding investment and sensitively managing new development, this part of the Local Plan is organised around five character areas. These areas contain a number of neighbourhoods which together share similarities that distinguish them from other parts of the Borough.[155] This includes similarities in the prevailing urban form, historic character, topography, landscape and other features. Figure 13.1 illustrates the extent of the character areas and their neighbourhoods.

13.3. Each character area will play an important role in supporting the delivery of the Borough's spatial strategy, helping to accommodate growth that meets local needs (such as for genuinely affordable housing, new workspace and supporting infrastructure). To set clear expectations in this respect, and to ensure that new development is sensitively integrated into our neighbourhoods, the Local Plan sets out a future vision, key (spatial) objectives and place principles for each area. These should be used to inform investment decisions and guide development proposals.

13.4. In addition, each character area is accompanied by site allocation policies. These establish land use principles and design guidelines for strategic development sites. These sites have been included within the Local Plan because they are considered necessary to support the delivery of the spatial strategy for the Borough.

~~13.5. We have published, and are in the process of preparing, additional guidance to help realise the vision for the character areas and to support implementation of their place principles. This includes supplementary planning documents and masterplans that all new development proposals will be expected to have regard to and positively engage with. Some of the key guidance documents for Lewisham's character areas are signposted throughout the following section.~~

Commented [NE723]: Repetition – deleted

Lewisham in the context of London

[155] The setting of the character areas has been informed by the Lewisham Characterisation Study (2019), which should be referred for further information. We acknowledge the neighbourhood boundaries overlap with each other, and that communities may define themselves around different geographies and social contexts. However, the organisation of the Borough in this way provides a useful starting point for a place-based planning and delivery framework.

~~13.6.~~13.5. It is recognised that neighbourhoods and communities are defined around different geographies and social contexts, and that people's sense of place is not solely shaped by the extent of Lewisham's administrative boundaries. Places and spaces beyond the Borough also contribute to local distinctiveness and influence the way in which people relate to their surroundings. The vision and place principles for each character area are therefore informed by Lewisham's relationships with other London boroughs, particularly those adjoining it.

~~13.7.~~13.6. The overarching objective for "An Open Lewisham as part of an Open London" reflects our commitment to strengthening relationships with the rest of the Capital. This will not only promote inclusive neighbourhoods and communities but is necessary to support the delivery of the London Plan's spatial development strategy. The Local Plan sets out a shared vision for how Lewisham's character areas should evolve over time, building on their functional relationships with other parts of London. This includes, for example, cross-boundary relationships established through transport connections and the public realm, the network of green infrastructure (including open spaces and waterways), town centres and the local economy. As well, the character areas will be influenced by their changing sub-regional context, including significant new development delivered in Opportunity Areas near the Borough, such as Canada Water and Old Kent Road in Southwark and at Greenwich Peninsula.

Delivering the spatial strategy and meeting local needs

~~13.8.~~13.7. To help to facilitate Good Growth in Lewisham the Local Plan includes site allocation policies. These are detailed policies for strategic development sites that are critical to the delivery of the spatial strategy. The sites will play an important role in addressing the Borough's needs for new housing, workspace and main town centre uses, along with supporting infrastructure (including community facilities, transport and green infrastructure).

13.8. Each site allocation includes information on the development capacity of a site for different types of land uses. The process for identifying sites and the methodology used for setting capacity figures are set out in the "Lewisham Local Plan: Site Allocations Background Paper" – this should be referred for further information. The site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach, and having regard to relevant planning policies. Table 13.1 summarises the overall delivery outcomes expected by the site allocations, both borough-wide and by character area. This demonstrates that the Local Plan has identified sites with sufficient capacity to meet the Borough's ~~new London Plan~~ housing target~~s, as set by the London Plan (Intend to Publish version),~~ as well as needs identified in our latest Employment Land and Retail Capacity Studies.[156]

[156] For the South area, the housing capacity figures are set out as a range. This is owing to the significant uplift in development capacity that could be achieved on selected sites in Bell Green / Lower Sydenham through delivery of Phase 2 of the Bakerloo ~~L~~line e~~E~~xtension.

Table 13.1: Site allocations – indicative delivery outcomes			
Character area	Homes (net units)	Employment (gross floorspace sqm)	Town centre uses (gross floorspace sqm)
Central	7,085	73,714	131,499
North	12,921	110,597	124,866
East	1,244	5,140	13,325
South	2,262-4,736	23,793	38,648
West	901	23,985	10,612
Total	**24,413 – 26,887**	**237,228**	**318,950**
		NET ADDITIONAL (excluding consented developments) 62,634	**NET ADDITIONAL (excluding consented developments) 32,394**

Commented [SA724]: Amended to reflect latest housing trajectory and employment floorspace figures

14 Lewisham's Central Area

Context and character

Commented [NE725]: Following section amended throughout for factual updates

14.1. 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 Cconservation Aareas and listed buildings within and adjacent to the area. The Central Area contains the linked but complementary major town centres of Lewisham and Catford.

14.2. The character of Lewisham Mmajor Ccentre and its surrounds is strongly informed by its shopping and leisure destinations, as well as its highly active public places, including the strategic rail interchange and market. It has an distinctive urban scale character with a tall buildings cluster which is surrounded by a lower density grid of residential terraces. Many sites have recently been redeveloped with high quality designs.Whilst public realm improvements have been delivered through the redevelopment of larger sites over recent years However much of the town centre remains fragmented and disconnected from its surrounding neighbourhoods as a result of larger sites and blocks, with .There remain areas of with poorer quality public realm, including the walking and cycle environment, particularly on Lewisham High Street. Many of the older sites have a poor quality retail and leisure offer. There are sSignificant site redevelopment opportunitiesexist, including the 1970s built shopping centre and multi-storey car park, which alongside planned strategic public transport investment improvements, that will allow the character of Lewisham to be 'reimagined'.

14.3. Catford Mmajor Ccentre comprises the civic hub of the Borough with a key focal point at the historic Broadway Theatre. The town centre has a generally distinctive urban scale character with office and commercial buildings that iswhich are surrounded by smaller scale, established residential areas and high quality open spaces. Some key sites have recently been redeveloped to a high quality design standard, such as the Catford Stadium, which has enabled river restoration works. However the layout of larger sites and blocks, and the location of the South Circular dissecting the town centre, has led to high levels ofcreates issues of severance and poor permeability with the town centre and its surrounds, and poor permeability and legibility, especially in the main shopping area. Generally there is aThe quality of the public realm is generally poor throughout the centre, poor walking and cycle environment particularly along the South Circular and at its junction with Rushey Green (A21). There are sSignificant site redevelopment opportunities, exist which alongside planned strategic transport investment improvements, that will allow the character of Catford to be 'reimagined'.

14.4. The A21 Ccorridor is currently dominated by vehicular traffic with a vehicles, giving rise to issues of congestion, noise and poor air quality. Its poor quality public realm, which inhibits movement by walking and cycling. The High Street is generally not well connected to its surrounding neighbourhoods, and is dominated by larger sites and blocks leading to irregular east-west connections. Whilst the character of the Ccorridor is well established around Lewisham Hospital (with opportunities to 'reinforce' the existing character), opportunities exist for intensification along the majority of the corridor.

~~14.4.~~14.5. Hither Green is characterised by predominantly ~~smaller scale historic~~established residential areas of a Victorian character which are serviced by local centres and parades, including near Hither Green station and along Hither Green Lane. ~~There is a poor sense of arrival to the immediate west of the train station with limited links across the railway~~. 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 o~~O~~pportunities ~~exist~~ for the sensitive ~~infill and high quality~~intensification of the area through small sites development to 'reinforce' the existing local character and enhance the vitality and viability of commercial areas.

Commented [NE726]: Respond to consultation – more detail sought on Hither Green

Vision

14.5. By 2040 the linked but complementary town centres of Lewisham and Catford will evolve as vibrant hubs of commercial, cultural, civic and community activity. The character and role of the centres, and the A21 corridor that connects them, will be re-imagined by building on the area's many attributes and excellent transport links. The arrival of the Bakerloo line together with the modernisation of Lewisham interchange will open opportunities for everyone to benefit from.

14.6. New housing, including a high proportion of genuinely affordable housing, business space and jobs, and community facilities will be focussed along the A21 C~~c~~orridor (Lewisham High Street, Rushey Green and Bromley Road), encompassing Lewisham and Catford town centres, as well as out-of-centre retail parks. The A21 will be transformed ~~into a 'healthy street'~~using the Healthy Streets Approach, ~~that better connects neighbourhoods,~~ with public realm enhancements that better connect neighbourhoods and make walking, cycling and the use of public transport safer and more convenient. Lewisham M~~m~~ajor C~~c~~entre will become a highly accessible M~~m~~etropolitan C~~c~~entre of exceptional quality; its continued evolution supported by new transport infrastructure and the renewal of larger sites, including the shopping centre. The re-routing of the South Circular (A205) will enable the comprehensive regeneration of Catford major centre into London's greenest town centre, with high quality public realm enhancing links to the stations and supporting its role as the Borough's main civic and cultural hub. In Hither Green and e~~E~~lsewhere, the character of established residential areas will be reinforced, with their sensitive intensification providing for improvements throughout the wider area.

14.7. Residents and visitors will benefit from excellent access to high quality parks, open and green spaces. The river valley network will have greater prominence. Improvements to the environmental quality and amenity value of the Rivers Ravensbourne, ~~and~~ Quaggy and Pool will be realised through their re-naturalisation, particularly around the key visitor destinations of Lewisham and Catford centres. Waterlink Way, running alongside the River Ravensbourne, will be enhanced, with breaks in the route repaired to form the central feature of a network of walking and cycle routes that link open and green spaces.

Figure 14.1: Central area

Key spatial objectives

To achieve the vision our key spatial objectives are to:

1. Secure the delivery of the Bakerloo line extension and Lewisham interchange upgrade to improve public transport access~~ibility~~ within the Borough and to help unlock the development potential of the Opportunity Area.

2. Facilitate the renewal of Lewisham M~~m~~ajor C~~c~~entre into a well-connected modern metropolitan centre and employment hub~~,~~. ~~with a~~ Strengthen the centre's role as a community and cultural destination, building on the presence of a thriving market at its heart. Enhance routes and permeability within and through the centre by the redevelopment of ~~strategic~~ larger sites, including the shopping centre.

3. Secure the re-routing of the South Circular (A205) to enable the comprehensive regeneration of Catford M~~m~~ajor C~~c~~entre into London's greenest town centre, and reinforce and expand its role as the Borough's main civic and cultural hub.

4. Transform the A21 C~~c~~orridor, South Circular (A205) ~~into a 'healthy street'~~ and the A20 by applying the Healthy Streets Approach with public realm improvements that make walking, cycling and the use of public transport safer and more convenient. Enhance the place qualities of the A21 C~~c~~orridor by integrating new high quality housing development along and around it, and redeveloping out-of-centre retail parks and buildings for a wider mix of uses.

~~4.~~5. Strengthen the role of Staplehurst Road and Hither Green Lane Local Centres, and other commercial areas nearby, to secure their long-term vitality and viability and to make the neighbourhood more liveable. Improve connectivity within and through Hither Green by addressing severance caused by railways and major roads, including public realm enhancements at the Hither Green station approaches and their surrounds.

~~5.~~6. Reinforce and enhance the character of established residential areas, local centres and parades~~. At the same time, d~~ whilst deliver~~ing~~ new homes and area improvements through their sensitive intensification.

~~6.~~7. Protect and ~~promote~~ enable the renewal of industrial land at Bromley Road. Improve the quality of the townscape around Bellingham local centre, particularly at Randlesdown Road and Bellingham station approach.

~~7.~~8. Enhance the environmental quality and amenity value of the Ravensbourne and Quaggy Rivers. Improve public access to the rivers with new and improved routes, focussing on Waterlink Way and Silk Mills Path.

~~8.~~9. Protect and enhance open and green spaces, including waterways. Deliver the Lewisham Links, a connected network of high quality walking routes and cycleways ~~routes~~ that link these spaces and other key destinations.

Figure 14.2: Central Area key diagram

LCA 1 Central Area place principles

~~A. Development proposals must make the best use of land in helping to facilitate Good Growth and ensuring that the regeneration potential of the Opportunity Area[157] is fully~~

Commented [NE727]: Respond to consultation – more emphasis needed on cultural and community role of the centre

Commented [NE728]: To reflect the objective of the Catford Town Centre Framework

Commented [NE729]: Respond to consultation – more prominence given to A20

Commented [NE730]: Respond to consultation – more details sought on Hither Green, especially area west of Hither Green station

~~[157] Refers to the New Cross / Lewisham / Catford Opportunity Area, as established by draft the London Plan policy SD1 (Opportunity Areas).~~

~~realised. This will require that investment is appropriately coordinated within Lewisham's Central Area and that:~~

~~a. A significant amount of new development is directed to the major town centres of Lewisham and Catford, and along the A21 corridor linking the centres, including for high quality housing, workspace, town centre and community uses, along with supporting infrastructure;~~

~~b. New employment development is concentrated within town centres and the Bromley Road Strategic Industrial Location;~~

~~c. Opportunities are taken to deliver new and improved workspace through the intensification of sites and renewal of industrial land, along with improving the environmental quality of employment locations;~~

~~d. The out-of-centre Retail Park at Bromley Road is comprehensively redeveloped for a wider mix of complementary uses; and~~

~~e. Land is safeguarded to secure the delivery of strategic transport infrastructure, in line with Policies TR1 (Sustainable transport and movement) and TR2 (Bakerloo line extension) including:~~

~~i. Bakerloo line extension;~~

~~ii. Lewisham station interchange; and~~

~~iii. Realignment of the South Circular road.~~

~~B. Development proposals will be expected to facilitate growth and investment within the Central Area whist enhancing its place qualities by supporting:~~

~~a. Lewisham major centre's transition to a metropolitan centre of sub-regional significance, having regard to Policy LCA2 (Lewisham major centre and surrounds);~~

~~b. The comprehensive regeneration of Catford major centre, reinforcing its role as the Borough's principal civic and cultural hub, having regard to Policy LCA3 (Catford major centre and surrounds); and~~

~~c. The transformation of the A21 corridor and its immediate surrounds into a series of healthy neighbourhoods with a distinctive urban character, and reinforcing its role as a strategic movement corridor for sustainable transport modes, having regard to Policy LCA4 (A21 corridor).~~

A. Development proposals must contribute to the delivery of Good Growth with reference to Policy OL1 (Delivering an Open Lewisham) and in doing so, demonstrate how they have responded positively to and will support the achievement of the key spatial objectives for the Central Area.

~~C.~~B. Development proposals ~~should~~ must help to ensure the Central Area benefits from a high quality network of walking routes and cycleways ~~connections and routes~~ that ~~better link~~connect neighbourhoods and places, including green spaces and waterways, ~~having regard~~with reference to Policy ~~LCA5~~ GR4 (~~Central~~ Lewisham Links).

~~D.~~C. Staplehurst Road ~~will be~~ and Hither Green Lane are designated as ~~a~~ Llocal Ccentres reflecting the role ~~it~~ they play~~s~~ in the provision of local services and community facilities, along with ~~its~~ their accessible location near Hither Green station.

Commented [NE731]: Removed to reduce repetition – these points are covered both in Policy OL1 and the key spatial objectives above. A new Criterion (A) has been written to ensure developments engage with these objectives.

Commented [NE732]: Respond to consultation – Hither Green Lane designated new Local Centre, following further review. Details also in Part 2 Economy and Culture chapter

To help secure the long-term viability of the L~~l~~ocal C~~c~~entres, development proposals should:

a. ~~Enhance the character and~~ Address severance caused by the railway and improve access~~ibility~~ to and along the station approaches and the Local C~~c~~entres~~, including by improving~~ through public realm enhancements.~~ and the legibility of~~ that make walking routes, ~~and~~ cycleways ~~routes; and~~ and station entrances (including at Springbank Road) safer and more legible;

~~a.~~b. Enhance the character of the Local Centres through shopfront improvements, tree planting and, where appropriate, refurbishing or redeveloping buildings that detract from local character; and

~~b.~~c. Facilitate the renewal of non-designated employment sites in proximity to the station to secure a complementary mix of commercial and other uses.

~~E.~~D. The distinctive character of the residential hinterland within Catford, Lewisham and Hither Green will be reinforced. To help meet the Borough's future needs, particularly for housing, sensitively designed and high quality development on small sites ~~(such as infill and backland sites)~~ will be supported where this responds positively to the area's local and historic character.

~~F.~~E. The river valley network is a defining feature of the Central Area which development proposals ~~should~~ must respond positively to by:

a. Ensuring that development is designed to improve the ecological quality of the Ravensbourne and Quaggy rivers, including by naturalising the rivers, wherever opportunities arise;

b. 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~~

c. 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 routes and ~~cycling links~~ cycleways that enhance access to the river from the town centres of Lewisham and Catford, and the A21 C~~c~~orridor, will be strongly supported; and

~~c.~~d. Designing development with reference to the River Corridor Improvement Plan .

~~G. Development proposals for tall buildings in the Central Area will only be acceptable in those locations identified as being appropriate for tall buildings, having regard to the requirements of Policy QD4 (Building heights).~~

~~H. The Council has prepared evidence base documents and planning guidance to assist with understanding of the distinctive characteristics of the neighbourhoods and places within the Central Area, and to help ensure coordination in the delivery of new investment. Development proposals should refer to and positively engage with these documents, including:~~

~~a. Lewisham Characterisation Study (2019);~~

~~b. Catford Town Centre Masterplan (Forthcoming);~~

~~c. A21 Design Guidance SPD (Forthcoming); and~~

~~d. River Corridor Improvement Plan SPD (2015).~~

Commented [NE733]: Respond to consultation – more details sought on Hither Green, especially area to west of station

Commented [NE734]: Small sites typologies are set out in elsewhere in the plan

Commented [NE735]: Repetition – this is addressed in Policy QD4 on building heights

Commented [NE736]: Repetition – covered elsewhere in the plan

LCA 2 Lewisham Mmajor Ccentre and surrounds

A. Continued investment in Lewisham Mmajor Ccentre to enable its ~~transition to~~future designation as a Mmetropolitan Ccentre of sub-regional significance in London~~, and a gateway to the south east,~~ is a strategic priority. To realise this objective and secure the centre's long-term vitality and viability, development proposals must contribute to a coordinated process of transformational improvement to the town centre and its environment. They should ~~also~~ deliver a complementary mix of main town uses, ~~including~~ along with new housing, whilst ensuring that the centre's predominant commercial role is maintained and enhanced.

B. Development proposals will be ~~expected~~ required to help facilitate, and must not prejudice, the delivery of ~~strategic~~ transport infrastructure necessary to ensure the centre can effectively serve, and benefit from, a wider sub-regional catchment and to support Opportunity Area objectives. This includes the Bakerloo line extension, Lewisham station interchange, land required for bus services, ~~and~~ as well as new and improved walking routes and cycleways ~~routes~~. ~~Detailed site specific~~Further requirements are set out in Policy TR1 (Sustainable transport and movement) and the site allocation policies for the Central Area.

C. Development proposals should respond positively to the evolving urban ~~scale and~~ character of the centre and its surrounds. They must be designed with ~~particular~~ reference to their relationship with existing clusters of tall and taller buildings, the prevailing townscape and skyline, having regard to Policy QD4 (Building heights). Development ~~should also~~must be designed to provide an appropriate transition in bulk, scale, massing, height and character from ~~the surrounding~~ residential neighbourhoods around the centre, ~~its~~ the edges of the centre and ~~into the heart of the town~~ the centre's commercial core, with generous setbacks provided along the Ravensbourne and Quaggy rivers, main roads and other ~~routes~~corridors for movement.

D. Development proposals must contribute to enhancing the public realm by applying the Healthy Streets Approach. They should ~~in order to~~ promote and enable movement by walking, ~~and~~ cycling and the use of public transport~~, and~~ in order to make the town centre a significantly more accessible, safer, healthier and attractive ~~environment~~ place. This will require that a clear hierarchy of streets is established within the town centre and its surrounding neighbourhoods, along with a cohesive and legible network of walking routes and cycleways running through and/or connecting key ~~strategic sites,~~ commercial destinations, public transport nodes, ~~and~~ public open spaces and residential areas. Particular consideration will need to be given to movements to and from Lewisham station interchange, connecting Silk Mills Path and residential neighbourhoods to the north, and Lewisham Gateway and the wider town centre area to the south.

E. Development proposals ~~should~~ must be designed to improve access and permeability in the town centre and its surrounding area, particularly where sites are to be delivered through comprehensive redevelopment. This includes new or enhanced east-west routes through the Lewisham Shopping Centre site, along

Loampit Vale and Thurston Road, and from Silk Mills Path to Connington Road and Lewisham Road.

F. Development proposals ~~will be expected to~~must maximise opportunities to improve the ecological quality and amenity value of the river environment. This includes improved access to the River Ravensbourne by extending and enhancing Waterlink Way that traverses the wider town centre area, and the River Quaggy at Lee High Road. Development p~~P~~roposals should make provision for attractive and robust embankments as an ~~central~~ integral ~~design~~ feature of the design, particularly along the River Ravensbourne in order to enhance connections from Silk Mills Path to Lewisham transport interchange and the Lewisham Gateway site, leading to the town centre and the Primary Shopping Area.

G. Lewisham m~~M~~arket is at the heart of the town centre and will be protected as an important commercial destination, community anchor and visitor attraction. Development proposals should assist in securing the long-term viability of the market by protecting and enhancing its amenity, delivering public realm and access improvements, and making provision for facilities for traders. Effective management of the market and associated public realm will be essential to its long-term viability, and the Council will work with stakeholders to secure appropriate management arrangements.

H. Within the designated town centre area and at its edges, development proposals must provide for an appropriate mix of main town centre uses at the ground floor level. Retail uses should be concentrated within the Primary Shopping Area, forming the main use across the shopping frontages, and supported with a wider range of complementary commercial, leisure and cultural uses elsewhere. Evening and n~~N~~ight-time economic activities will be supported where they ~~positively~~ contribute positively to the local area, with reference to Policy EC18 (Culture, creative industries and the night-time economy).

I. Development proposals must make provision for p~~P~~ositive ~~-~~ frontages with ~~and~~ active ground floor frontages ~~will be required at the street level, particularly~~ within the town centre and at its edges. This includes along Lewisham High Street, Molesworth Street, Rennell Street and Lewisham Grove – which together help to frame the Primary Shopping Area – as well as Loampit Vale, Lee High Road and Lewisham Road. ~~In order to ensure~~ D~~d~~evelopment ~~interfaces well with the~~must reinforce or create a positive relationship with the public realm~~, special attention should be given to design~~ at the street or ground floor level, and where appropriate podium levels of buildings. Where new housing is proposed within the town centre~~,~~ this will only be acceptable on the upper floor levels.

J. To ensure Lewisham M~~m~~ajor C~~c~~entre~~'s~~ maintains its role as one of the Borough's principal commercial and employment locations, development proposals ~~will be expected to~~must retain or re-provide existing workspace, and deliver net ~~increases~~ gains in industrial capacity wherever possible. A broad range of workspace typologies will be supported within the centre and its immediate surrounds, with priority given to Class ~~B1~~ E(g) uses, including hybrid workspace combining office and

light~~er~~ industrial ~~workspace~~ uses appropriate to the area. Provision of workspace suitable for small and independent businesses, including units of 500 square meters or less, will be strongly encouraged.

LCA 3 Catford M~~m~~ajor C~~c~~entre and surrounds

A. Reinforcing the role of Catford M~~m~~ajor C~~c~~entre as Lewisham's principal civic and cultural hub is ~~a strategic priority~~integral to the delivery of the spatial strategy. To realise this objective and to secure the centre's long-term vitality and viability, development proposals must contribute to a coordinated process of town centre regeneration that responds positively to Catford's distinctive character. They should ~~also~~ deliver a complementary mix of main town centre uses, ~~including~~ along with new housing, whilst ensuring that the centre's predominant civic, commercial and cultural role is maintained and enhanced.

B. Development proposals must be delivered through the masterplan process~~,~~ in accordance with ~~relevant site allocation policies and~~ the Catford Town Centre ~~Masterplan~~Framework and where appropriate, site allocation policies.

C. ~~Proposals for~~ T~~t~~he realignment of the South Circular (A205) at Catford Major Centre will be ~~progressed~~ facilitated through the Local Plan and delivered through a partnership approach with ~~key stakeholders, including~~ Transport for London and other key stakeholders. ~~This will help~~The road realignment ~~to facilitate~~ will enable the comprehensive regeneration ~~and renewal in~~ of the town centre and enhance the liveability of its surround~~ing~~s neighbourhoods~~, in particular, by addressing existing issues of severance and pollution to create a more cohesive, safer, healthier and accessible town centre area~~. Development proposals ~~will be expected to~~must maximise opportunities presented by the road realignment~~, including through designs that provide~~ to make provision for safe~~r~~ ~~access~~ movement along and across the South Circular and its ~~main~~ junction~~s~~ at Rushey Green (A21), new and improved public realm and ~~more accessible,~~ high quality, publicly accessible open spaces.

D. Development proposals should respond positively to the evolving urban ~~scale and~~ character of the town centre and its immediate surrounds. Development ~~should~~ must be designed to provide for an appropriate transition in scale, bulk, mass, ~~and~~ height and character ~~between~~ from ~~the centre, its edges and surrounding~~ residential neighbourhoods around the centre, the edges of the centre, and the centre's commercial and civic core, with generous setbacks provided along the Ravensbourne River, major roads and other corridors for movement.

E. Development proposals must contribute to enhancing the public realm by applying the Healthy Streets Approach. They should ~~in order to~~ promote and enable movement by walking, ~~and~~ cycling~~,~~ and the use public transport to make the town centre a significantly more accessible, safer, healthier and attractive ~~environment~~place. This will require that a clear hierarchy of streets is established within the wider town centre area, along with a cohesive and legible network of walking routes and cycleways running through and/or connecting key ~~strategic sites~~, commercial, civic and cultural destinations, public transport nodes, ~~and~~ public open spaces and residential areas. Particular consideration will need to be given to

Commented [NE737]: This is addressed in the policy supporting text and justification

movements to and from Catford and Catford Bridge stations and along Rushey Green (A21). Careful consideration will also need to be given to the relationship between vehicular, pedestrian and cycle movements and access at Sangley, Brownhill and Plassy Roads, and the South Circular (A205)~~, and safe walking and cycling will be prioritised~~.

F. Development proposals must respond positively to the historic and cultural character of the town centre and its surrounds~~, and~~ whilst preserve~~e~~ing or enhance~~e~~ing the significance of heritage assets, including by:
    a. Retaining the Broadway Theatre as an integral local landmark and cultural destination within the centre. Development should be designed to ensure the theatre remains a prominent visual feature marking the eastern gateway to The Broadway;
    b. Designing development with reference to the historic fabric of the local area. In particular, development should seek opportunities to enhance the townscape by reinstating the network of historic lanes within the town centre; and
    c. Addressing the relationship of new development with the Culvery Green Conservation Area to the south.

G. Development proposals ~~should~~ must respond positively to the distinctive character of ~~T~~the Broadway~~,~~ and the buildings of townscape merit ~~that line it,~~along it. ~~and~~ They should reinforce and enhance the ~~its~~ function of the Broadway as a key movement corridor by walking and cycling~~, and~~ as well as a focal point of community and commercial activity.

H. Development proposals ~~will be expected to~~must maximise opportunities to improve the ecological quality and amenity value of the river environment. This includes measures to deculvert and naturalise the River Ravensbourne near Catford and Catford Bridge Stations, and to improve 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. Development p~~P~~roposals should make provision for attractive and robust embankments as an ~~central~~ integral ~~design~~ feature of the design to enhance connections to town centre's western gateway, Ladywell Fields and the train stations.

I. Catford m~~M~~arket forms an integral part of the town centre and will be protected as an important commercial destination, community anchor and visitor attraction. Development proposals should assist in securing the long-term viability of the market by protecting and enhancing its amenity, delivering public realm and access improvements, and making provision for facilities for traders.

J. Development proposals must provide for an appropriate mix of main town centre uses. Retail uses should be concentrated within the Primary Shopping Area, forming the main use across the shopping frontages, and supported with a wider range of complementary civic, commercial, leisure and cultural uses elsewhere. Evening and n~~N~~ight-time economic activities should help to reinforce Catford's role as an important cultural destination, and will be supported where they ~~positively~~ contribute

Commented [NE738]: This is captured by reference to the Healthy Streets Approach, cross-referenced above and detailed in Policy TR3.

positively to the local area, with reference to Policy EC18 (Culture, creative industries and the night-time economy)..

K. Development proposals must make provision for p~~P~~ositive frontages within the town centre and at its edges ~~will be required at the street level,~~ with active ground floor frontages ~~particularly~~ along Rushey Green, The Broadway and within the Primary Shopping Area. ~~Positive frontages should be integrated elsewhere within the town centre area and at its edges~~. ~~In order to ensure~~ D~~d~~evelopment ~~interfaces well~~ must reinforce or create a positive relationship with the public realm~~, special attention should be given to design~~ at the street or ground floor level, and where appropriate, podium levels of buildings.

L. Catford M~~m~~ajor C~~c~~entre is a key commercial and employment location. It has a unique civic and cultural function that distinguishes it from, and helps to complement, Lewisham M~~m~~ajor C~~c~~entre. Development proposals ~~will be expected to~~must retain or re-provide existing workspace and deliver net ~~increases~~ gains in industrial capacity wherever possible. A broad range of workspace typologies will be supported within the centre and its immediate surrounds, with priority given to Class ~~B1~~ E(g) uses, including office floorspace and hybrid workspace combining office and lighter industrial ~~workspace~~ uses appropriate to the area. Provision of workspace suitable for small and independent businesses, including units of 500 square meters or less, will be strongly encouraged, particularly where the space is designed to support the cultural and creative industries.

LCA 4 A21 C~~c~~orridor

A. The transformation of the A21 C~~c~~orridor (Lewisham High Street, Rushey Green and Bromley Road) and its immediate surrounds into a ~~series~~ network of liveable and healthy neighbourhoods with a distinctive urban character is ~~a strategic priority~~ integral to the delivery of the spatial strategy. Development proposals ~~should make the best use of land to enable delivery of high quality, mixed-use residential neighbourhoods within this Central Area location. They should also reinforce and enhance the corridor's movement function, ensuring it supports a wider network of well-connected neighbourhoods and places~~ must demonstrate how they have responded positively to the A21 Development Framework through the design-led approach.

Commented [NE739]: To refer to the A21 Development Framework and ensure this informs the design

B. Development proposals along the A21 C~~c~~orridor and its immediate surrounds ~~should~~ must contribute to enhanc~~e~~ing the place qualities of the corridor by:
   a. Responding positively to the evolving urban character of the area~~, including~~ through the sensitive intensification of ~~strategic and other~~ sites, ~~having regard to the A21 Design Guidance SPD~~ where appropriate;
   b. Helping to establish a distinctive and legible urban grain along and around the C~~c~~orridor, including clusters of development of an urban scale situated at major road junctions;
   c. Ensuring new development ~~interfaces well~~ reinforces or creates a positive relationship with the public realm, including through the provision of positive frontages along the C~~c~~orridor, and active ground floor frontages incorporating

commercial and community uses, where appropriate, particularly in town centres and edge-of-centre locations;

d. Maximising opportunities to integrate tree planting and other urban greening measures; and
e. Enhancing connections between the M~~m~~ajor C~~c~~entres of Catford and Lewisham, as well as neighbourhoods surrounding the C~~c~~orridor, through the delivery of new and improved public realm.

C. Development proposals must reinforce and enhance the role of the A21 as a strategic movement corridor~~, giving priority to safe and convenient movement by walking and cycling, as well as the use of public transport~~ by applying the Healthy Streets Approach. This principal north-south route should be supported by a complementary network of legible, safe and accessible walking routes~~, including cycling Quietways,~~ and cycleways that link with it to enhance connections between neighbourhoods and places, including open spaces such as Ladywell Fields, Lewisham Park, ~~and~~ Mountsfield Park and the River Ravensbourne.

D. Development proposals should investigate and maximise opportunities to reinstate or enhance the network of finer grain east-west connections for walking and cycling to and from the A21 C~~c~~orridor, and the river valley, particularly where sites are to be delivered through comprehensive redevelopment.

~~E. Development proposals on sites along the A21 corridor and its surrounds should be designed having regard to the Healthy Streets principles, in line with Policy TR3 (Healthy streets as part of heathy neighbourhoods).~~

Commented [NE740]: Repetition – covered elsewhere in policy and plan

~~LCA5 Central Lewisham Links~~

~~A. Development proposals will be expected facilitate the creation and enhancement of the Central Lewisham Links, a connected network of high quality walking and cycle routes linking key routes, public open spaces and other key destinations across the Central area.~~

~~B. On sites located adjacent to an existing or proposed route of the Central Lewisham Links, or where an existing or proposed route runs through a site, development proposals must contribute to the delivery of a high quality public realm, giving priority to movement by walking and cycling, in line with Policy QD3 (Public realm) and TR3 (Healthy streets and part of healthy neighbourhoods). Proposals will be expected to deliver public realm improvements to support the delivery of the Central Lewisham Links, the specific nature of which will be considered on a site-by-site basis, and may include contributions towards:~~

~~a. New or enhanced footpaths or cycleways;~~
~~b. Road realignment;~~
~~c. Street crossings or other safety measures;~~
~~d. Cycle parking;~~
~~e. External lighting;~~
~~f. Landscaping;~~
~~g. Tree planting or other green infrastructure;~~
~~h. Drinking water fountains;~~

~~i. Public conveniences;~~
~~j. Way-finding signage.~~

~~C. To support the effective implementation of the Central Lewisham Links, development proposals will be expected to have regard to the Council's Parks and Open Spaces Strategy.~~

Commented [NE741]: Absorbed into new borough-wide Lewisham Links policy – see Part 2, Policy GR4. However, sub-area section supplemented with a new map of the links

Lewisham's Central Area

14.8. Lewisham's Central Area features the linked but complementary M~~m~~ajor C~~c~~entres of Lewisham and Catford. These centres~~,~~ together with the A21 road~~,~~ make up a strategic growth corridor within the Borough. A London Plan Opportunity Area broadly covers the extent of this corridor. ~~It is instrumental to the delivery of the spatial development strategy for London.~~ To fully realise the growth potential of the Opportunity Area it is vital that the regeneration and renewal of the M~~m~~ajor C~~c~~entres is delivered and new ~~strategic~~ transport infrastructure is secured, including the Bakerloo line extension and upgrade of Lewisham interchange, which is one of London's main strategic transport interchanges. ~~The Local Plan sets out a strategy to ensure that growth and regeneration in the Central Area is effectively coordinated, with a clear framework in place to support the long-term vitality and viability of the town centres; also, to facilitate the Bakerloo line extension and upgrades to the Lewisham interchange, one of London's key strategic transport interchanges.~~

Commented [NE742]: Repetition – removed to make more concise

14.9. The regeneration and renewal of Lewisham M~~m~~ajor C~~c~~entre, enabling its transition to a M~~m~~etropolitan C~~c~~entre, is a key Local Plan objective which is supported by the London Plan. A significant amount of investment has been directed to the town centre in recent years. This reflects the strong commitment by the Council~~, its~~ and other ~~key~~ stakeholders ~~and development industry partners~~ to deliver a high quality, modern M~~m~~etropolitan C~~c~~entre. A number of major ~~schemes~~ developments have ~~planning~~ been consented ~~with several having been completed~~or completed, bringing a significant amount of new homes, business space and community facilities to the centre~~,~~ together with public realm and environmental improvements. This includes the removal and reconfiguration of the gyratory at Lewisham Gateway and river restoration works. There remain opportunities for additional sites to come forward~~,~~ whose redevelopment ~~can~~ will enhance the function and place qualities of the centre. ~~Clear development guidelines are needed to ensure a coordinated approach to site delivery.~~ Lewisham Shopping Centre is noteworthy given ~~its scale~~the size of the site and its prominent position at the heart of the centre. Its redevelopment is essential to improving access~~ibility~~ and ~~circulation~~ permeability within and through the centre as well as to enhance the amenity of Lewisham m~~M~~arket, an important visitor destination in its own right.

14.10. Catford M~~m~~ajor C~~c~~entre is the civic heart of the Borough where the Council's main offices are located. It contains a number of historic buildings~~,~~ including civic and cultural venues, such as Broadway Theatre, which give it a distinctive character and identity. The town centre has a growing evening and night~~-~~time economy along with a range of shops and services, including the Catford m~~M~~arket, which cater to the daily needs of local residents. However, the centre suffers from areas of poorer quality public realm, particularly around the South Circular~~,~~ which acts as a barrier to movement and segregates the centre from its surrounding

neighbourhoods. The realignment of the road is critical to enable the comprehensive regeneration of the town centre. This will bring substantial public benefits including a significant amount of new housing and business space along with a revitalised centre. To help inform the Local Plan and ~~ensure coordination in the delivery of strategic sites, the Council is preparing a masterplan for the centre~~ support its implementation, the Council has prepared the Catford Town Centre Framework.

14.11. There are opportunities to enhance the liveability of Hither Green by reinforcing and strengthening the role of its Local Centres at Staplehurst Road and Hither Green Lane. This can in turn help to attract new investment to this part of the neighbourhood. The long-term viability and vitality of the centres can be supported by access and public realm improvements, particularly around Hither Green station and its western approaches. The railway and major roads present barriers to movement within and through the local area, including to open spaces such as Mountsfield Park and the River Quaggy at Manor Park.

Commented [NE743]: Respond to consultation – further detail about Hither Green

~~14.11.~~14.12. An effective and resilient transport network is essential to the achievement of inclusive, healthy and liveable neighbourhoods. There are a number of strategic transport schemes within the Central Area which will help to support the levels of ~~planned~~ growth planned both in Lewisham and across London. This includes the Bakerloo line extension and the Lewisham station interchange. Along with securing these ~~investments in~~ public transport projects~~,~~ the Local Plan seeks to deliver a well-integrated network of high quality walking routes and cycleways ~~routes. The main aim is to realise a significant shift in journeys made by vehicles to more sustainable modes~~ to promote and enable modal shift away from cars. The transformation of the A21 Corridor ~~into a~~using the Healthy Streets Approach ~~underpins this approach~~ is integral to the delivery of the spatial strategy. The A21 Corridor is the principal north-south route within Lewisham, linking the major centres of Lewisham and Catford as well as neighbourhoods further south along Bromley Road. It has significant potential for accommodating growth and improving connections between neighbourhoods and places, including open spaces such ~~such~~ as Ladywell Fields, Lewisham Park~~,~~ ~~and~~ Mountsfield Park and the River Ravensbourne.

~~14.12.~~14.13. Transport for London ~~have~~ has completed an Outcome Definition study along the A21~~.~~ ~~which has shown~~This shows that significant improvements are needed to encourage and enable mod~~e~~al shift ~~to cycling, walking and public transport use~~, including improved cycle infrastructure, bus priority measures and additional pedestrian crossings. Although ~~this work is~~projects are subject to Government funding, any developments or future plans in the area should support this. Providing clear connections and routes on side streets off the A21 will be key to ensure that the area can cope with the increased demand, and to improve the links between Lewisham and Catford.

~~14.13.~~14.14. The river corridor network is a defining feature of the Central Area, with the Rivers Ravensbourne and Quaggy traversing it. There are opportunities to improve the ecological quality and amenity value of the waterways, both by naturalising rivers and enhancing public access to them. The comprehensive redevelopment of sites within and around Lewisham and Catford M~~m~~ajor C~~c~~entres have significant potential in this respect. ~~The East~~ The Lewisham Links are a connected network of walking routes and cycleways centred on the network of

green infrastructure, including waterways.~~, recognising the priority given to improving public access to it,~~Development proposals must support the delivery of the Lewisham Links, particularly by enhancing public access to and along the Waterlink Way.

Figure 14.1 Central Area

Figure 14.2 Central Area key diagram

Figure 14.3 Central Area Lewisham Links

Figure 14.~~3~~4 Central Area site allocations

Site allocations

Note: For the text only version of the Local Plan: Main Issues and Preferred Approaches document, the Central Area site allocations are included ~~in a separate~~at the end of this document.

15 Lewisham's North Area

Context and character

15.1. 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 reflect the Borough's unique Thames side character.

15.2. The North Area has a rich and varied historic environment with a number of listed buildings and C~~c~~onservation A~~a~~reas. Historic buildings and structures include churches, Georgian townhouses, Victorian terraces, industrial warehouses and railway viaducts. Local character is also strongly influenced by the historic Royal D~~d~~ockyard and maritime industries, with the first residential areas developed around the Greenwich railway. The area was heavily damaged in WWII and redevelopment through the subsequent interwar and post-war 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.

15.3. The North Area contains much of the Borough's employment land stock~~, giving~~ which contributes to its ~~a~~ distinctive industrial character. There are ~~designated and non-designated~~ employment sites situated throughout, including the regionally important Strategic Industrial Location at Surrey Canal ~~Triangle~~ Road and clusters of L~~l~~ocally S~~s~~ignificant Industrial S~~s~~ites around Deptford Creekside. Several larger industrial sites have recently undergone a plan-led process of regeneration. ~~Contemporary mixed-use residential and employment schemes have been introduced, including larger tower blocks with taller elements situated on landmark sites.~~ Continued renewal of ~~older~~ vacant and underused ~~employment~~ industrial sites will influence the area's evolving character~~,~~ whilst ~~helping to improve its~~providing for new homes, jobs and community facilities along with environmental ~~qualities~~improvements. For example, p~~P~~lanning

consent has been granted for major mixed-use developments at Convoys Wharf and Surrey Canal Triangle~~.~~.

15.4. The character of the North Area is also strongly informed by the layout of historic roads and railway infrastructure that dissects much of the area. This infrastructure contributes to severance and limits permeability and circulation within and between neighbourhoods and places. There are key movement corridors within the area linking to other parts of London, such as Surrey Canal Road, Evelyn Street (B200) and New Cross Road (A2). However these ~~main routes are~~roads are dominated by vehiculesar, prone to traffic and congestion, and typically suffer from poorer quality public realm, which limit~~sing~~ their suitability for movement by walking and cycling.

15.5. The historic H~~h~~igh S~~s~~treets at Deptford and New Cross play a key role in shaping and reinforcing local character and identity. They offer provision of a rich and vibrant mix of shops, services and independent traders. Deptford market, situated at the heart of Deptford D~~d~~istrict C~~c~~entre, is a focal point for community activity and a well-known visitor destination. New Cross D~~d~~istrict C~~c~~entre is a vibrant town centre and thriving evening and night-time economy hub that serves its local catchment, including a large student population. The town centres benefit from their proximity to important cultural and educational institutions, including the Albany Theatre, Goldsmiths College and Trinity Laban Centre, which exert a strong influence over the area. These institutions play a critical economic role and have been vital to the growth of the creative and digital industries in the Borough. The North Area includes one of London's first Creative Enterprise Zones.

15.6. The network of green infrastructure in the North Area, including parks, ~~and~~ open spaces and waterways, 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.

Vision

15.7. By 2040 the maritime and industrial heritage of the North area, linked to its unique position along the River Thames, will be celebrated as a vital focus for cultural activity and regeneration. The character and role of vacant and underused industrial sites around the Thames and Deptford Creek will be re-imagined to provide well integrated employment areas and mixed-use neighbourhoods. A new Creative Enterprise Zone will cement Lewisham's position as a leader in the creative and cultural industries and support an inclusive local economy. The arrival of the Bakerloo line, with a new station at New Cross, will also open opportunities for everyone to benefit from.

15.8. The regeneration of larger brownfield sites will deliver a significant amount of new housing, including a high proportion of genuinely affordable housing, workspace and jobs, community facilities and open space. New mixed-use areas will be created at Convoys Wharf, the Timber Yard at Deptford Wharf and Surrey Canal Triangle. These will be well integrated with existing neighbourhoods and communities, including housing estates, ensuring all local residents enjoy access to decent homes, high quality living environments and good job opportunities. The

historic Hhigh Sstreets at New Cross and Deptford Ddistrict Ccentres will remain at the heart of community activity, reflecting the area's culture and diversity. The centres will form an integral part of the Creative Enterprise Zone (CEZ) featuring modern and affordable workspace, including artists' studio space, building on the presence of world renowned institutions such as Goldsmiths College, Trinity Laban Centre and the Albany Theatre. New workspace will be delivered through the renewal of industrial land, including sites around Surrey Canal Road and Deptford Creekside.

15.9. Residents and visitors will benefit from excellent access to high quality parks, open and green spaces. The riverfront will be transformed into an attractive leisure destination that is well connected to its surrounding neighbourhoods. Enhancements to Waterlink Way at Deptford Creekside will also provide for improved access to the river valley corridor. A network of walking routes and cycleways routes will enhance connections within and beyond the area, with Folkestone Gardens a focal point for linking key radial routes, including the route of the former Grand Surrey Canal. New Cross Road (A2) will also be transformed into ausing the 'Hhealthy Sstreets', Approach with public realm enhancements that make walking, cycling and the use of public transport safer and more convenient, particularly around New Cross and New Cross Gate stations.

Figure 15.1: North Area

Key spatial objectives

To achieve the vision our key spatial objectives are to:

1. Secure the delivery of the Bakerloo line extension, with a new modern station at New Cross Gate, to improve transport accessibility and to help unlock the development potential of the Opportunity Area.

2. Continue to deliver modern business space through the regeneration of larger vacant and underused industrial sites, such as Convoys Wharf, Timber Yard at Deptford Wharf and Surrey Canal Triangle. Create new high quality, residential and mixed-use areas that are well integrated with existing neighbourhoods and communities, including the Pepys Estate.

3. Secure the future of Millwall Football Club in the Borough with a modern stadium as part of a new leisure and community destination, supported by a new Overground station.

4. Protect and enable the renewal of industrial land at Surrey Canal Road. Re-configure Strategic Industrial Land to create a high quality mixed-used, employment quarter at the edges of Deptford Park and Folkstone Gardens, with an improved transition between residential and industrial uses in the area.

5. Create new opportunities for business by making better use of land around railways, including railway arches and the 'Bermondsey Dive Under'.

6. Establish a Creative Enterprise Zone to cement Lewisham's position as one of London's leaders in the creative, cultural and digital industries. Support and grow these industries through the renewal of industrial sites at Deptford Creekside Cultural Quarter, along with new workspace and artists' studio space elsewhere. Build on the

Commented [NE744]: Respond to consultation - clarification

presence of world renowned institutions, such as Goldsmiths College, Trinity Laban Centre and Albany Theatre.

7. Deliver heritage-led regeneration schemes to preserve and enhance Lewisham's industrial and maritime heritage, as well as the character and cultural identity of historic ~~H~~high ~~S~~streets at Deptford and New Cross. Ensure Deptford market remains a vibrant hub of commercial and cultural activity at the heart of the community.

~~7.~~8. Apply the Healthy Streets Approach within and around Evelyn Street Local Centre to help secure its long-term vitality and viability. Better integrate the centre with surrounding neighbourhoods and Deptford High Street by ensuring new development creates a positive relationship with the centre, including new or improved links.

~~8.~~9. Transform New Cross Road (A2) Corridor and other major roads ~~into a~~ using the 'H~~h~~ealthy S~~s~~treets' Approach with public realm improvements that make walking, cycling and the use of public transport safer and more convenient, including the expansion of cycle hire throughout the North Area. Secure the removal of the Amersham Gyratory. Create a lively and continuous frontage along New Cross Road by repairing breaks in the townscape, such as through infill development and the introduc~~ing~~tion of active uses at the street level.

~~9.~~10. Maximise the recreational and amenity value of the River Thames and Deptford Creekside by transforming the riverside area into a vibrant neighbourhood and visitor destination. Secure Creekside's continued role in accommodating boating communities, including boat dwellings. Enhance public access to the river, including by repairing breaks in the Thames Path and Waterlink Way, as well as enabling river bus services at Convoys Wharf.

~~10.~~11. Protect and enhance open and green spaces, including waterways. Continue to deliver and expand the North Lewisham Links, a connected network of high quality walking routes and cycleways ~~routes~~ that link these spaces. Ensure these routes address existing barriers to movement, such as those caused by the tangle of railways and major roads.

~~11.~~12. Safeguard the strategic waste management sites required to ensure Lewisham is net waste self-sufficient.~~, including~~ Maximise opportunities to improve the environmental performance of existing waste facilities, including by~~South East London Combined Heat and Power (SELCHP), and~~ developing decentralised energy networks linked to ~~this facility~~ South East London Combined Heat and Power (SELCHP) and better mitigating amenity impacts of facilities.

Figure 15.2: North Area key diagram

LNA 1 North Area place principles

~~A. Development proposals must make the best use of land in helping to facilitate Good Growth and ensuring that the regeneration potential of the Opportunity Area[158] is fully realised. This will require that investment is appropriately coordinated within Lewisham's North Area and that::~~

~~[158] Refers to the New Cross / Lewisham / Catford and Deptford Creek / Greenwich Riverside Opportunity Areas, as established by draft London Plan policy SD1 (Opportunity Areas).~~

Commented [NE745]: Respond to consultation – reflect need for new developments such as Convoys Wharf to create a positive relationship and better integrate with the centre

Commented [NE746]: Respond to consultation – strengthen point on cycle hire as it is especially feasible and viable in the north area

Commented [NE747]: Respond to consultation – recognise existing boating community and help secure its long term future in the area

Commented [NE748]: Respond to consultation – Many respondents suggesting that SELCHP should be de-commissioned. However as set out in Local Plan Policy SD12, at current time London Plan effectively requires that SELCHP continues to be safeguarded. The revised objective responds to consultation feedback by emphasising need to improve the facility's environmental performance, including DE network development and better mitigating amenity impacts, such as air quality, where opportunities arise.

a. ~~The comprehensive regeneration of strategic sites is facilitated to deliver new urban localities that are well-integrated with existing neighbourhoods, bringing a significant amount of new housing and workspace, along with community facilities and other supporting infrastructure. The includes regeneration of the Mixed-use Employment Locations of Convoys Wharf, Oxestalls Road and Surrey Canal Triangle;~~

b. ~~New employment development is concentrated within town centres, Mixed-use Employment Locations, Locally Significant Industrial Sites and the Surrey Canal Road Strategic Industrial Location;~~

c. ~~Opportunities are taken to deliver new and improved workspace through the intensification of sites and renewal of industrial land, along with improving the environmental quality of employment locations. Cultural and creative industries will be promoted, in particular, in order to enhance existing clusters of commercial activity within Lewisham's Creative Enterprise Zone;~~

d. ~~Development proposals reinforce and enhance the integral role of the Deptford Creekside and New Cross Cultural Quarters n supporting the cultural and creative industries; and~~

e. ~~Land is safeguarded to secure the delivery of strategic transport infrastructure, in line with Policies TR1 (Sustainable transport and movement) and TR2 (Bakerloo line extension), including:~~

i. ~~Bakerloo line extension, including a new station interchange at New Cross;~~

ii. ~~A new London Overground station at Surrey Canal Road; and~~

iii. ~~River bus services at Convoys Wharf.~~

Commented [NE749]: Removed to reduce repetition – these points are covered both in Policy OL1 and the key spatial objectives above. A new Criterion (A) has been written to ensure developments engage with these objectives.

A. Development proposals must contribute to the delivery of Good Growth with reference to Policy OL1 (Delivering an Open Lewisham) and in doing so, demonstrate how they have responded positively to and will support the achievement of the key spatial objectives for the North Area.

~~B. The transformation of the New Cross Road / A2 corridor into a well-functioning and healthy street that supports a well-connected network of neighbourhoods and places will be facilitated, in line with Policy LNA2 (New Cross Road / A2 corridor).~~

Commented [NE750]: Repetition – covered in key spatial objectives above, and additional standalone policy LNA2

~~C.~~B. Development proposals ~~should~~ must help to ensure the North Area benefits from a high quality network of walking routes and cycleways ~~connections and routes~~ that ~~better link~~connect neighbourhoods and places, including green spaces and waterways, having regard to Policy ~~LNA5~~ GR4 (~~North~~ Lewisham Links). Folkestone Gardens should form a central point for a series of walking and cycle connections across the area, supported by public realm enhancements around the viaduct and Surrey Canal Road.

~~D.~~C. Development proposals ~~should~~ must seek to foster community cohesion and improve accessibility by addressing elements of the built environment that segregate neighbourhoods and places from one another. This includes severance caused by the convergence of rail lines around Surrey Canal Road, ~~as well as~~ the barriers to movement around and across other major roads, ~~such as~~including New Cross Road and Evelyn Street (A200) and the wall at Leeway adjacent to Convoys Wharf.

Commented [NE751]: Included to ensure proposals consider feasibility of addressing wall

~~E.~~D. Heritage-led regeneration will be vital to delivering high quality and distinctive neighbourhoods across the North Area. Development proposals ~~should address~~ must respond positively to the historic environment as an integral part of the design-led approach. Opportunities should be taken to preserve, better reveal and reinstate heritage assets and features that contribute to ~~the area's~~local character and identity, particularly where sites are delivered through comprehensive~~ly through the masterplan process~~ development. This includes heritage assets associated with:

a. Deptford's maritime and industrial heritage, including the Royal Naval Dockyard;
b. The route of the Grand Surrey Canal, particularly by helping to facilitate the delivery of the Surrey Canal Linear Walk along with improving public access to it; and
c. The historic fabric and urban grain of the H~~h~~igh S~~s~~treets at Deptford and New Cross.

~~F.~~E. Development proposals must respond positively to t~~T~~he River Thames and Deptford Creek ~~are defining features of the North Area which development proposals should respond positively to, having regard~~ with reference to Policy LNA4 (Thames Policy Area and Deptford Creekside). ~~Development proposals will be expected to~~They must maximise opportunities to improve the ecological quality and amenity value of these ~~river environment~~ waterways, including by ~~facilitating the provision of new and enhanced connections~~ creating or enhancing walking routes and cycleways to and along the waterfront, particularly the Thames Path and Waterlink Way at Deptford Creek.

Commented [NE752]: Repetition - Removed to make more concise, further details on character set out in LNA4

~~G.~~F. Development proposals ~~should~~ must respond positively to the historic and cultural character of New Cross and Deptford D~~d~~istrict ~~town~~ C~~c~~entres. A wide range of commercial, cultural and community uses will be supported within the centres~~, helping to ensure~~to support their vitality and long-term viability ~~and~~ as well as to ~~broadening~~ expand their role as key nodes of employment ~~generating~~ activity within the Creative Enterprise Zone.

~~H.~~G. Development proposals should reinforce and enhance the role of New Cross and Deptford Cultural Quarters by supporting and enabling the clustering of complementary cultural, community and commercial uses within these locations, ~~having regard~~with reference to Policy EC 18 (Culture, creative industries and the night-time economy).

H. Deptford market and market yard are at the heart of the Deptford D~~d~~istrict ~~town~~ C~~c~~entre and will be protected as an important commercial destinations and visitor attractions. Development proposals should assist in securing the long-term viability of the market by protecting and enhancing its amenity, delivering public realm and access improvements, and making appropriate provision of space and ~~for~~ facilities for traders.

I. Development proposals must support the vitality and viability of Evelyn Street Local Centre by creating and maintaining a positive relationship with the centre, and responding positively to its location at a key transitional position between Deptford High Street and Convoys Wharf. This includes the provision of new and improved

walking routes and cycleways to and around the centre, including links to open spaces. Proposals should also deliver other public realm enhancements to improve the place qualities of the centre including streets trees and other urban greening measures, with reference to Policy QD3 (Public realm).

J. ~~The Council has prepared evidence base documents and planning guidance to assist with understanding of the distinctive characteristics of the neighbourhoods and places within the North Area, and to help ensure coordination in the delivery of new investment.~~ Where relevant, d~~D~~evelopment proposals ~~should refer and positively engage with these documents, including:~~ must demonstrate how they have responded positively to the New Cross Area Framework and Surrey Canal Triangle SPD through the design-led approach.
    a. ~~Lewisham Characterisation Study (2019);~~
    b. ~~New Cross Area Framework and Station Opportunity Study (2019);~~
    c. ~~New Cross Gate Station SPD (forthcoming);~~
    d. ~~Surrey Canal Triangle SPD (2020); and~~
    e. ~~River Corridor Improvement Plan SPD (2015).~~

Commented [NE753]: Re-phrased to make more concise. Reference to New Cross Area Framework and Surrey Canal Triangle SPD retained. Other guidance documents referred elsewhere in plan.

LNA 2 New Cross Road / A2 C~~c~~orridor

A. ~~Development proposals should be designed to facilitate~~ T~~t~~he transformation of the New Cross Road / A2~~1~~ C~~c~~orridor and its immediate surrounds into a ~~well-functioning and healthy street,~~well-connected network of liveable and healthy neighbourhoods with a distinctive historic and cultural character is integral to the delivery of the spatial strategy. Development p~~P~~roposals ~~should make the best~~must demonstrate how they will make the optimal use of land to ~~enable the~~support the delivery of a high quality, lively and thriving H~~h~~igh S~~s~~treet~~. They should also~~ whilst reinforcing~~e~~ and enhancing~~e~~ the C~~c~~orridor's movement function~~, ensuring it supports a wider network of well-connected neighbourhoods and places.~~

B. Development proposals along the New Cross Road / A2 C~~c~~orridor and its surrounds ~~should~~ must enhance the place qualities of the C~~c~~orridor by:
    a. Responding positively to heritage assets, including the historic character and urban grain of New Cross Road and its wider setting;
    b. Reinforcing the predominant commercial function and distinctive identity of the H~~h~~igh S~~s~~treet, taking opportunities to introduce a wider and richer mix of uses into the area;
    c. Enhancing the continuity of the H~~h~~igh S~~s~~treet from Old Kent Road to Deptford by repairing breaks and activating frontages along it, particularly through the retention and introduction of appropriate commercial, cultural and community uses at the street or ground floor level;
    d. Improving relationships between the north~~ern~~ and south~~ern~~ sides of New Cross Road to create a more cohesive H~~h~~igh S~~s~~treet, including through public realm enhancements that reduce barriers to movement by walking and cycling and enable safe access along and across the road;
    e. Delivering public realm improvements that make the C~~c~~orridor a more accessible, attractive and welcoming place;
    f. Maximising opportunities to integrate tree planting and other urban greening measures; and

g. Supporting the continued evolution of the Cc~~o~~rridor and its surrounds as a more liveable and healthy neighbourhood, including through the sensitive intensification and renewal of ~~strategic and other~~ sites; and

~~g.~~h. Ensuring development will not result in an unacceptable routing or volume of cars and other vehicles onto primarily residential streets.

C. Development proposals must reinforce the role of New Cross Road as a strategic movement corridor by applying the Healthy Streets Approach~~, giving priority to the safe and convenient movement by walking and cycling, as well as the use of public transport~~. This principal east-west route should be supported by a complementary network of legible, safe and accessible walking routes~~, including~~ and cycleways ~~routes,~~ that link with it to enhance connections between neighbourhoods and places. This includes connections to Deptford and New Cross D~~d~~istrict C~~c~~entres, New Cross and New Gate s~~S~~tations, Goldsmith's College and open spaces in the surrounding area, such as Bridgehouse Meadows, Fordham Park and Folkestone Gardens. Development p~~P~~roposals ~~will be expected to~~must secure the continuity and extension of North Lewisham Links Route 1, which runs parallel to New Cross Road, including a new bridge over the railway at the Hatcham Works and Goodwood Road sites.

D. The Council will work in ~~A~~ partnership ~~approach~~ with the Mayor of London / Transport for London and other stakeholders ~~will be pursued to help facilitate the transformation of the New Cross Road / A2 corridor into a healthy street, particularly~~ to deliver ~~strategic~~ new transport infrastructure and public realm improvements along and around New Cross Road, including:

a. A new high quality station interchange at New Cross Gate, which is necessary to secure the delivery of the Bakerloo line extension and significantly improve interchanges between walking, cycling and different public transport modes;

b. ~~Interventions to support~~Public realm enhancements designed to ~~a~~ rebalanc~~eing of~~ transport modes along New Cross Road ~~to~~ with priority~~ise~~ given to ~~movement by~~ walking and cycling, including by widening pavements and reducing pinch-points; and

c. Improvements at key junctions to enhance safety for all road users, including at the Amersham g~~G~~yratory.

~~E. Development proposals on sites along the New Cross Road / A2 corridor and its surrounds should be designed having regard to the Healthy Streets principles, in line with Policy TR3 (Healthy streets as part of healthy neighbourhoods).~~

Figure 15.3: Creative Enterprise Zone

LNA 3 Lewisham Creative Enterprise Zone

A. A Creative Enterprise Zone ~~(CEZ)~~ is designated in Lewisham's North Area. The CEZ 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

Commented [NE754]: Respond to consultation – clarity required about how growth will be appropriately managed

Commented [NE755]: Removed to make more concise – priority for walking, cycling and public transport is implicit in the Healthy Streets approach, as set out in Policy TR3

Commented [NE756]: Absorbed into A above

character, and the need to expand on their role as a catalyst for local economic and cultural development.

B. 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:
   a. The regeneration of Mixed-use Employment Land;
   b. Retaining and enhancing workspace provision at Deptford Creekside;
   c. Focused renewal of ~~industrial sites~~SIL and MEL located at the convergence of Grinstead Road and Trundleys Road~~s~~ to establish a revitalised employment-led mixed-use quarter; and
   d. Promoting a wide range of complementary commercial, cultural and community uses within and around New Cross and Deptford D~~d~~istrict ~~town~~ C~~c~~entres, including evening and night-time economic activities;~~,~~ and
   ~~d.~~e. 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).

C. The continued growth and evolution of the creative and cultural industries within the CEZ will be supported, in particular, by:
   a. Ensuring that ~~new~~ development proposals protect existing ~~business floorspace~~industrial capacity and contribute to making provision for ~~a wide range of~~flexible workspace and facilities in suitable locations, at an appropriate range of rents. Development p~~P~~roposals will be considered favourably where they incorporat~~ing~~ e low-cost and ~~element of~~ an appropriate amount of affordable workspace, particularly space catered to micro, small and medium sized businesses, including start-ups and independents~~, will be considered favourably~~;
   b. Ensuring new development proposals are designed to enable full-fibre digital connectivity, or equivalent infrastructure, ~~connectivity~~ to all end users;
   c. Encouraging the temporary use of vacant buildings and sites for ~~creative~~ workspace catered to creative and cultural activities; and
   d. Building on the vital role of the area's cultural and education institutions in supporting the local economy, and seeking to strengthen their beneficial relationships with Lewisham's creative and cultural industries.

D. Within the CEZ~~,~~ development proposals involving the loss of ~~B1 Use~~ Class E(g) office and light industrial ~~workspace~~ and Sui Generis business space that is currently occupied ~~by,~~ or suitable for~~,~~ use ~~in~~ by the creative and cultural industries, including artists~~'~~ workspace, will be strongly resisted. Development p~~P~~roposals involving the ~~redevelopment of this~~loss or change of use of type of workspace will ~~be required to~~only be permitted where they:
   a. Ensure that an equivalent amount of ~~B1 Use~~ Class E(g) workspace is re-provided within the proposal (which is appropriate in terms of type, use and size), incorporating existing businesses where possible; or
   b. Within a Mixed-use Employment Location, seek to maximise the provision of ~~B1 Use Class~~Class E(g) office and light industrial workspace for uses in the

Commented [NE757]: Amended to aid policy implementation - Policies EC5 and EC7, along with site allocations, make clear which sites this applies to

Commented [NE758]: Additional reference to Cultural Quarter, which is linked to and supports the CEZ

Commented [NE759]: Amended to reflect changes to the Use Classes Order

creative and cultural industries, and demonstrate that reasonable efforts have been made to retain or re-provide such existing provision; and

c. ~~Include an element of~~Retain existing and make provision for new affordable workspace, in line with Policy EC4 (~~Providing suitable business space~~Low-cost and affordable workspace).

Figure 15.4: Thames Policy Area

LNA 4 Thames Policy Area and Deptford Creekside

A. Development proposals must respond positively to the distinctive character ~~and environmental qualities of~~ the River Thames and Deptford Creek. They ~~should~~ must also support and seek to maximise the multifunctional social, economic and environmental functions and benefits of the watercourses, ~~having regard~~with reference to Policy SD9 (~~Water management~~Lewisham's waterways).

B. Development proposals on sites within the designated Thames Policy Area, and adjacent to Deptford Creek, ~~will be expected to~~must address the watercourse as an integral part of the design-led approach. ~~New development~~They should help to reinforce and enhance the site's relationship with the River Thames and Deptford Creek, including by:

a. Maintaining and enhancing the ecological quality and nature conservation value of the river or creek and its corridor, including the walls and foreshore;

b. Maximising opportunities to enhance the aesthetic value of the watercourse and visual amenity provided by it, having particular regard to:

i. Views, vistas, landmark features and other points of interest;

ii. Building lines, along with the orientation and spacing between buildings; and

iii. Physical connections to the river or creek, including walking and cycle routes that enable access to the waterfront;

c. Addressing the river or creek as an important part of the public realm and contributing to the liveliness of the waterfront. Development should incorporate positive frontages and, where appropriate, accessible public spaces or facilities at the ground floors of buildings and their forecourts, particularly along the Thames Path and Waterlink Way;

d. Maintaining the stability of the flood defences and investigating opportunities to retreat flood defences, particularly to increase flood storage, enhance biodiversity, and ~~enhance~~ create or improve visual connections with the river or creek;

e. Resisting encroachment into the creek or river and foreshore; ~~and~~

f. Making provision for an appropriate mix of uses on sites, along with enabling river-related and marine uses, where appropriate, in line with other policies. 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; and

~~f.~~g. Ensuring development does not adversely impact on the amenity of uses within industrial areas and safeguarded wharves, in line with the Agent of Change.

Commented [NE760]: Policy re-phrased, with environmental functions continuing to be captured in policy; also covered more comprehensively in SD9 which is cross-referenced

Commented [NE761]: Public consultation – request policy recognise and protect provision for boating community

Commented [NE762]: Public consultation – request from Port of London Authority for stronger recognition of amenity around river related industrial uses and wharves

C. Development proposals on sites within the Thames Policy Area, and adjacent to Deptford Creek, must preserve or wherever possible enhance the significance of heritage assets and their setting. This will require that particular attention is given to the maritime and industrial heritage of the area, and that opportunities to preserve or reinstate heritage assets are fully investigated and implemented wherever feasible.

~~LNA5 North Lewisham Links~~

~~A. Development proposals will be expected facilitate the creation and enhancement of the North Lewisham Links, a connected network of high quality walking and cycle routes linking key routes, public open spaces and other key destinations across the North area.~~

~~B. On sites located adjacent to an existing or proposed route of the North Lewisham Links, or where an existing or proposed route runs through a site, development proposals must contribute to the delivery of a high quality public realm, giving priority to movement by walking and cycling, in line with Policy QD3 (Public realm) and TR3 (Healthy streets and part of healthy neighbourhoods). Proposals will be expected to deliver public realm improvements to support the delivery of the North Lewisham Links, the specific nature of which will be considered on a site-by-site basis, and may include contributions towards:~~

- ~~a. New or enhanced footpaths or cycleways;~~
- ~~b. Road realignment;~~
- ~~c. Street crossings or other safety measures;~~
- ~~d. Cycle parking;~~
- ~~e. External lighting;~~
- ~~f. Landscaping;~~
- ~~g. Tree planting or other green infrastructure;~~
- ~~h. Drinking water fountains;~~
- ~~i. Public conveniences;~~
- ~~j. Way-finding signage.~~

~~C. To support the effective implementation of the North Lewisham Links, development proposals will be expected to have regard to the Council's Parks and Open Spaces Strategy.~~

Commented [NE763]: Absorbed into new borough-wide Lewisham Links policy – see Part 2, Policy GR4. However, sub-area section supplemented with a new map of the links

Lewisham's North Area

15.10. Lewisham's North Area has a key role to play in accommodating growth and ~~supporting our~~where the Council will continue to support regeneration ~~objectives~~to secure inclusive, safe, healthy and liveable neighbourhoods. A large part of the area falls within a London Plan Opportunity Area~~. It~~ and is therefore instrumental to the delivery of the spatial development strategy for London. There are pockets of deprivation ~~in localities~~ across the North Area, with some localities in the 20 per cent most deprived in the country. Targeted interventions are required to tackle inequalities and the social, economic and environmental barriers that contribute to deprivation. The Local Plan sets out a strategy to ensure that growth and regeneration in the North Area is effectively coordinated,

with a clear framework in place to facilitate the Bakerloo line extension. It requires that new development is well integrated with existing neighbourhoods and communities~~,~~ and maximises opportunities to deliver transformational area improvements ~~and transformational change~~ for the benefit of everyone.

15.11. Mixed-use Employment Locations present the main opportunities for accommodating growth and securing new investment in the North Area. MELs are, for the most part, underused and vacant industrial sites. They are the Borough's largest reservoir of brownfield land suitable for redevelopment and include~~, for instance,~~ the Convoys Wharf and Surrey Canal Triangle sites. ~~The strategic approach for MELs was established by the Core Strategy.~~ There are now a number of MELs with planning consent for mixed-use development and some sites have started to come forward. We will continue to support the comprehensive regeneration and renewal of MELs in order to improve the environmental quality of the North Area and to deliver significant amounts of new housing, including genuinely affordable housing, workspace, community facilities and public realm ~~improvements~~enhancements, including new public open and green space. There is also scope to consolidate SIL land around Trundleys Road to create a high quality mixed-use employment quarter with an improved relationship with Folkestone Gardens. This will be facilitated through the plan-led process, in line with Policy EC5 (Strategic Industrial Locations), to ensure there is no net loss of industrial capacity. Site allocations ~~have been included in the plan to~~ set parameters for and will ensure certainty over the delivery of MELs and SIL. Guidance has also been prepared to support the Local Plan policies and provide clarity for the public ~~over~~ on development opportunities and outcomes sought, including the Surrey Canal Triangle SPD and New Cross Area Framework.

Commented [NE764]: Included to ensure a reasoned justification for this policy approach

15.12. The Local Plan designates a new Creative Enterprise Zone ~~for~~ in North Lewisham. This is one of the first CEZs in the Capital and is backed by the Mayor of London. It reflects the strength of our cultural, creative and digital industries and their rapid growth in the Borough in recent years. The Local Plan aims to enable the conditions for these sectors to continue to prosper over the long-term. This includes a positive and proactive approach to managing industrial land in the North Area to intensify development on employment sites and secure the delivery of new high quality workspace, including low-cost and affordable workspace as well as artists' studio space, for which there is a demand. This approach is complemented by other measures targeted at boosting these employment sectors. They include the designation of Cultural Quarters at Deptford Creekside and New Cross as well as Night-time Economy Hubs. These other measures aim to build on the diversity and strengths of the area's historic H~~h~~igh S~~s~~treets and their surrounds, as well its cultural assets and education institutions.

15.13. Lewisham is in many ways defined by its connection to ~~waterways, particularly~~ the River Thames and its tributaries. The Thames Policy Area is designated in the Local Plan. It requires that careful consideration is given to the character, amenity value and environmental quality of the River Thames and Deptford Creekside, along with the strategic function of the waterway network, including for passenger travel, river and marine-based commercial uses. Development proposals must comply with the Agent of Change principle. This will ensure that designs avoid, minimise and appropriately mitigate disturbances (such as noise) and conflicts that may result from the wide range of land uses within the area, including on industrial sites and safeguarded wharves. The river network also has and will continue to

Commented [NE765]: Public consultation – Additional supporting text on request of Port of London Authority re safeguarded wharves

play an important role in shaping Lewisham's identity and character. Creekside is home to an established boating community including boat dwellings. The Port of London Authority's Thames Vision also highlights the southern part of Deptford Creek as a potential Residential Mooring Opportunity Zone. The Borough has a ~~strong~~ distinctive maritime and industrial heritage, including the Royal Naval Dockyard and the Grand Surrey Canal, and there are opportunities to enhance, better reveal and reinstate heritage assets through ~~for~~ heritage-led regeneration.

Commented [NE766]: Public consultation – PLA Thames Vision recognises potential for residential mooring, additional justification for policy

15.14. An effective and resilient transport network is essential to ~~the achievement of~~ inclusive, safe, healthy and liveable neighbourhoods. There are a number of strategic transport schemes within the North Area which will help to support the levels of planned growth both in Lewisham and across London. This includes the Bakerloo line extension, including a new station at New Cross Gate, along with a new station at Surrey Canal Road serving the ~~East London Line (~~London Overground~~)~~. Along with securing these ~~investments in~~ public transport~~,~~ schemes the Local Plan seeks to deliver a well-integrated network of high quality walking routes and cycleways ~~routes~~. The main aim is to realise a significant modal shift ~~in~~ from journeys made by vehicles to more sustainable modes. Th~~is~~ will be enabled through the transformation of New Cross Road / A2 Corridor and other major roads ~~into a~~using the Healthy Street Approach~~underpins this approach~~. New Cross Road is a prominent east-west route within the area linking important visitor destinations. It has significant potential for improving connections between neighbourhoods and places, along with site redevelopment opportunities ~~to~~ which can help to enable public realm enhancements and townscape improvements.

15.15. ~~Elsewhere, T~~the North Lewisham Links ~~programme~~ is a well-connected network of high quality walking routes and cycleways that has been successfully delivered in key locations in the area, helping to improve access~~ibility~~ to parks, green spaces, waterways and other ~~amenities~~key destinations. ~~We will~~Development proposals must continue to support the delivery of these vital ~~walking and cycling~~ routes. The ~~early~~ success of this project has set a model for public realm enhancements ~~in~~ throughout the Borough, which will be implemented in line with Policy GR4 (Lewisham Links). ~~The 'links' concept will therefore be extended to Lewisham's other character areas, so to create a borough-wide network of linked routes~~.

Figure 15.1 North Area

Figure 15.2 North Area key diagram

Figure 15.3 North Area Lewisham Links

Figure 15.~~3~~4 North Area Area site allocations

Site allocations

Note: For the text only version of the Local Plan: Main Issues and Preferred Approaches document, the North Area site allocations are included ~~in a separate~~at the end of this document.

16 Lewisham's East Area

Context and character

16.1. Lewisham's East 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. Burnt Ash Hill is an important historic north-south route that connects from Blackheath to Lee. 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 the riverside and Blackheath in the area's north to Elmstead Wood in the south. This network of green infrastructure, including the Green Chain Walk connecting green spaces, is one of the area's defining features.

16.2. The East 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. The area's neighbourhoods are therefore some of the lowest density in the Borough.

16.3. The East Area contains the Ddistrict Ccentres of Blackheath and Lee Green. Blackheath is a significant historic area whose character centres on its heritage assets and strong village identity, along with the open expanses of the heath. Blackheath town centre ~~serves a generally local function although its~~has a rich character and village qualities that make it a key visitor destination, with an active evening and night-time economy. Lee Green has a distinctive historic character with a significant number of listed buildings. It is one of the Borough's smallest Ddistrict Ccentres ~~a~~that ~~s~~serves ~~its~~ the local ~~catchment~~ neighbourhood and communities with a mix of shops and services. It includes several large format retail units and the Leegate Shopping Centre, the latter of which was built in the 1960s. The centre suffers from areas of poorer quality public realm, with two busy roads forming a junction that dominates the centre of the H~~h~~igh S~~s~~treet. ~~,~~ Vacancy rates ~~and is~~indicate that Lee Green is not performing as well as other~~s~~ District Centres in the Borough.

16.4. Grove Park is located to the ~~very~~ southeast of the Borough and is somewhat disconnected from its surrounding ~~areas~~neighbourhoods. This is in part owing to railway lines to the northeast and southwest, as well as the South Circular, ~~that~~ which create physical barriers to movement and contribute to severance~~, along with the South Circular~~. Baring Road is a key route within the neighbourhood, as well as the historic corridor of Burnt Ash Road. ~~, although these routes are~~ They are dominated by ~~vehicular~~ vehicles, suffer from traffic and congestion, and have a ~~generally~~ poorer quality public realm, limiting opportunities for movement by walking and cycling. Grove Park station and the L~~l~~ocal C~~c~~entre comprise a gateway and focal point in the neighbourhood.

16.5. The Quaggy River, the upper reaches of which are known as Kyd Brook, passes through parts of Lewisham's East Area at Chinbrook Meadows in Grove Park and Lee Green. At Chinbrook Meadows, 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.

Vision

16.6. By 2040 the abundance of high quality parks, ~~and~~ green and open spaces in the East area will make it a distinctive part of Lewisham. This includes the open expanses of Blackheath which provide the setting for the Maritime Greenwich World Heritage Site and the village character of Blackheath Ddistrict Ccentre. These assets will help to strengthen the area's visitor economy~~, making it~~ and reinforce its role as a key destination in London. The character and ~~role~~ function of the town centres that formed along the historic route to Blackheath, including Grove Park and Lee Green, will be re-examined to ensure they remain thriving and vital hubs of community, ~~and business~~ commercial and cultural activity. Public realm iImprovedments along and ~~links~~ across major roads and railways will enhance movement between town centres and green spaces, opening opportunities for everyone to benefit from.

16.7. The revitalisation of the area's ~~town~~ District and Llocal Ccentres will ensure they remain thriving hubs of community and commercial activity as well as focal points for new housing, including a high proportion of genuinely affordable housing. The redevelopment of Leegate Shopping Centre will act as a catalyst for the renewal and revitalisation of Lee Green Ddistrict Ccentre, making it a vibrant, ~~more~~ welcoming and accessible place. The centre will feature enhanced gateways, aided by the transformation of Lee High Road (A20) and other roads by applying ~~into a~~ the 'Hhealthy Sstreets' Approach, with public realm enhancements that make walking, cycling and the use of public transport safer and more convenient. The Llocal Ccentres of ~~Burnt Ash~~Lee Station, Staplehurst Road and Grove Park will play an integral role in supporting their neighbourhoods. New development will deliver public realm and access improvements, enhancing the station approaches, making the centres more attractive for visitors and businesses. Blackheath Village Ddistrict Ccentre will build on its unique qualities as a visitor destination with a vibrant evening and night-time economy. Elsewhere, the character of established residential areas will be reinforced, with their sensitive intensification providing for improvements throughout the wider area.

16.8. Residents and visitors will benefit from excellent access to high quality parks, open and green spaces. The area's linear network of green infrastructure, which spans from the riverside and Blackheath in the north to Chinbrook Meadows in the south, will remain one of its predominant features. This will be celebrated by the distinction of an 'urban national park' in Grove Park, forming part of an integrated District Park, along with the open spaces at Blackheath. A network of high quality walking and cycle routes, including the Green Chain Walk, will link open and green spaces both within and outside of the borough.

Commented [NE767]: Respond to consultation – more emphasis in vision for aspiration of District Park

Figure 16.1: Eastern sub area

Key spatial objectives

To achieve the vision our key spatial objectives are to:

1. Re-establish Lee Green Ddistrict Ccentre as a welcoming and thriving hub of commercial, cultural and community activity. Deliver public realm improvements ~~and~~ together with high quality, mixed-use developments through the renewal of Leegate Shopping Centre and other town centre sites. Improve movement and safety within and through the centre by a~~A~~ddressing the dominance of ~~vehicular~~ vehicles and traffic congestion at the centre's main junction.

2. Preserve and enhance the distinctive qualities of Blackheath Village Dd~~d~~istrict Cc~~c~~entre whilst building on its strengths as a key visitor destination.

3. Reinforce the role of Grove Park Ll~~l~~ocal Cc~~c~~entre in supporting the neighbourhood and local communities. Improve the quality of the centre, including its streetscape, townscape and environment, through the redevelopment of larger sites within the centre and the delivery public realm enhancements, particularly around the station approach.

4. Strengthen the role of ~~Burnt Ash~~Lee Station Ll~~l~~ocal Cc~~c~~entre in supporting the neighbourhood and local communities. Improve the quality of the townscape around Lee Station, and the station approach, through the renewal of sites within and around Chiltonian Industrial Estate.

5. Protect and enable the renewal of industrial land at Blackheath Hill LSIS and other smaller industrial sites~~, with~~ through the delivery of new employment-led mixed-use development.

6. Transform the South Circular (A205~~, Baring Road~~), ~~and~~ Lee High Road (A20), Burnt Ash Road/Baring Road (A2212), Lee Road (A212) and other major roads ~~into~~using the 'H~~h~~ealthy S~~s~~treets' Approach, with public realm improvements that make walking, cycling and use of public transport safer and more convenient.

7. Preserve the Outstanding Universal Value of the Maritime Greenwich World Heritage Site Buffer Zone at Blackheath, along with protecting strategic views to and from it.

8. Protect and enhance the linear network of open and green spaces, along with improving public access to them.

9. Deliver a connected network of high quality walking and cycle routes that link open and green spaces, taking advantage of the Green Chain Walk. ~~Ensure these~~Deliver public realm enhancements along these routes to address existing barriers to movement, such as those caused by railways and major roads.

10. Enhance the environmental quality and amenity value of the River Quaggy, including by re-naturalising and improving public access to the river near Lee High Road.

Figure 16.2: East Area key diagram

LEA 1 East Area place principles

~~A. Development proposals must make the best use of land in helping to facilitate Good Growth, including through the focussed renewal of town centres and strategic sites. This will require that investment is appropriately coordinated within Lewisham's East Area and that:~~

~~a. The comprehensive redevelopment of strategic sites, and the renewal of other sites, within and around Lee Green district town centre is facilitated to secure the centre's long-term vitality and viability and to enhance its role as key focal point for community activity, in line with Policy LEA2 (Lee Green district centre and surrounds);~~

~~b. The renewal of sites at Grove Park and Staplehurst Roadlocal centres and their surrounds, including the station approaches, is facilitated to support the long-term vitality and viability of the centres;~~

~~c. Burnt Ash local centre plays a more prominent role in supporting the local area with provision of modern workspace, services and community facilities;~~

~~d. New employment development is concentrated within town centres and the Locally Significant Industrial Sites at Blackheath Hill and Manor Lane; and~~

~~e. Opportunities are taken to deliver new and improved workspace through the intensification of sites and renewal of industrial land, including through the co-location of employment and other compatible uses on LSIS, along with improving the environmental quality of employment locations.~~

Commented [NE768]: Removed to reduce repetition – these points are covered both in Policy OL1 and the key spatial objectives above. A new Criterion (A) has been written to ensure developments engage with these objectives.

A. Development proposals must contribute to the delivery of Good Growth with reference to Policy OL1 (Delivering an Open Lewisham) and in doing so, demonstrate how they have responded positively to and will support the achievement of the key spatial objectives for the East Area.

B. Development proposals affecting the Maritime Greenwich World Heritage Site Buffer Zone must protect and preserve the significance, integrity and authenticity of its 'Outstanding Universal Value', as well as its setting and the views to and from it, ~~in line~~ with reference to Policy HE2 (Designated heritage assets).

C. Development proposals ~~should~~ must respond positively to the historic and village character of Blackheath Dd~~d~~istrict Cc~~e~~ntre and its wider setting, as well the architectural qualities of buildings that contribute to its local distinctiveness. A wide range of commercial, cultural and community uses will be supported within the centre in order to secure its long-term vitality and viability. A carefully managed approach to new development will be taken to maintain the centre's village character and reinforce its role in supporting the visitor, evening and night-time economy, whilst ensuring the locality benefits from a high standard of amenity. The Healthy Streets Approach will be supported in and around Blackheath Village to improve accessibility by walking and cycling.

D. Development proposals must support t~~T~~he transformation of the South Circular (A205~~, Baring Road~~), ~~and~~ Lee High Road (A20), Burnt Ash Road/Baring Road (A2212) and Lee Road (A212) ~~into well-functioning and~~ by applying the H~~h~~ealthy S~~s~~treets Approach ~~that support a well-connected network of neighbourhoods and places will be facilitated,~~ in ~~line~~ accordance with Policy TR3 (Healthy streets as part of healthy neighbourhoods). ~~Development proposals should seek to~~ They must be designed to create or enhance ~~the~~ walking routes and cycleways ~~environment~~ through the provision of public realm improvements, ~~and~~ positive frontages and active ground floor frontages along the roads ~~including~~, where appropriate~~.~~. ~~the infilling of vacant and underused sites. Proposals that are designed to improve safe movement along and across the South Circular and Lee High Road will be strongly supported.~~

Commented [NE769]: Removed to make more concise – this point is implicit in the Healthy Streets Approach

E. The redevelopment and intensification of sites within the Lee Green Dd~~i~~strict Cc~~e~~ntre and ~~those~~ brownfield land fronting the key corridors of Lee High Road (between Weigall Road and Boone Street/Old Road), Baring Road (between Grove Park

station and Heather Road/Bramdean Crescent), and along the South Circular will be supported where development proposals respond positively to local character.

F. Development proposals should seek to address elements of the built environment that segregate neighbourhoods and places from one another. This includes the consideration of public realm improvements to address severance caused by the South Circular (A205), other major roads and rail lines, particularly within the northeast and southwest parts of the East Area, and well as those that establish the boundary with Lewisham's Central and South Areas.

G. Burnt Ash will beLee Station is designated as a Llocal Ccentre reflecting the role it plays in the provision of local services and community facilities, along with its accessible location near Lee station. To help secure the long-term vitality and viability of the local centre, development proposals should:
   a. Be designed to eEnhance the character of the townscape, and accessibility to and along the station approach and the centre, including by improving shopfronts, public realm and the legibility of walking routes and cycleways routes; and
   b. Facilitate the renewal of employment sites in proximity to the centre and station to secure a complementary mix of commercial and other uses and modern workspace.

H. The sensitive intensification of established residential neighbourhoods will be supported where new development proposals responds positively to their distinctive local and historic character, including the landscape setting. The Council will prepare aDevelopment proposals must have regard to the Small Sites Guidance SPD which development proposals should have regard to, where appropriate.

I. Opportunities should be taken to direct new investment to the Grove Park neighbourhood to address the pockets of deprivation within it, having regard with reference to Policy LEA3 (Strategic Area for Regeneration, Grove Park). New Ddevelopment proposals should respond positively to the character and design qualities of the Chinbrook Estate.

J. The network of green infrastructure within the East Area and its surrounds, including outside of the Borough, contributes to the area's distinctive character and environmental qualities. Development proposals should must contribute to protecting and enhancing this network of green infrastructure, including by integrating greening measures that establish new linkages and greater continuity between green and other open spaces, in line with reference to Policy LEA4 (Linear network of green infrastructure).

K. Development proposals should must help to ensure the East Area benefits from a high quality network of walking routes and cycleways connections and routes that better linkconnect neighbourhoods and places, including green spaces and waterways, having regard with reference to Policy LEA5 GR4 (East Lewisham Links).

L. The River Quaggy is a defining feature of the East Area which development proposals should must respond positively to. Development proposals will be expected tomust maximise opportunities to improve the ecological quality and

Commented [NE770]: Removed – for clarity and to aid policy implementation, the point is addressed by the addition of 'other major roads' within this policy.

Commented [NE771]: 'Other uses' removed – this was included with reference to mixed-use redevelopment opportunities with the Travis Perkins and Citrogeon Garage site, but which has now been removed as a site allocation (granted approval for a fully commercial led scheme).

Commented [NE772]: Amended to reflect the SPD is now adopted

Commented [NE773]: Repetition – these points captured in LEA4, which the policy cross-references

amenity value of the river environment, including by facilitating the provision of new and enhanced connections to and along the waterfront. This includes opportunities to deculvert and naturalise the River Quaggy near Lee High Road, as well as to deliver improved access and views to it, particularly around the town centre.

M. The Council has prepared evidence base documents and planning guidance to assist with understanding of the distinctive characteristics of the neighbourhoods and places within the North Area, and to help ensure coordination in the delivery of new investment. Development proposals should refer and positively engage with these documents, including:

   a. Lewisham Characterisation Study (2019);
   b. Small Sites Guidance SPD (forthcoming); and
   c. River Corridor Improvement Plan SPD (2015).

Commented [NE774]: Removed to make more concise – covered elsewhere in the Local Plan

LEA 2 Lee Green Ddistrict Ccentre and surrounds

A. Development proposals should must demonstrate how they will contribute to securing the long-term vitality and viability of Lee Green Ddistrict town 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 should must also deliver a complementary mix of main town centre uses, including along with new housing, whilst ensuring that the centre's predominant commercial and community role is maintained and enhanced.

B. The comprehensive redevelopment of strategic sites within the town centre should provide a catalyst for its renewal. Development proposals on strategic sites will be expected to optimise the use of land, having regard to other Local Plan policies. Strategic sites should be delivered through the masterplan process, taking into account their relationship with adjoining and neighbouring sites, to ensure a coordinated approach to town centre renewal. This is particularly for development proposals at of the sites at Leegate Shopping Centre, Sainsbury's Lee Green and the land at Lee High Road and Lee Road, which will together form a central focus for the renewal and revitalisation of the District Centre. Development proposals at these sites must be delivered in accordance with relevant site allocation policies.

Commented [NE775]: Repetition – removed to make more concise, these requirements are addressed elsewhere in the plan

C. Development proposals must contribute to enhancing the public realm by applying the Healthy Streets Approach. in order to They should promote and enable movement by walking, and cycling, and the use of public transport to make the town centre a significantly more accessible, safer, healthier and attractive environment. This will require that a clear hierarchy of streets is established within the wider town centre area, along with a cohesive and legible network of walking routes and cycleways running through and/or connecting key commercial, leisure and cultural destinations, public transport nodes, along with public open spaces and residential areas. Particular consideration will need to be given to movements along and across the main junction, Lee High Road, Lee Road, Burnt Ash Road, Taunton Road, Leyland Road and Hedgley Street.

D. Development proposals should respond positively to the evolving urban ~~scale and~~ character of the town centre and its immediate surrounds. Development should be designed to provide for an appropriate transition in scale, bulk, mass, ~~and~~ height and character between the centre, its edges and surrounding residential neighbourhoods, with generous setbacks provided along major roads and movement corridors.

E. Development proposals should be designed with p~~P~~ositive frontages and active ground floor frontages ~~should be integrated~~ within the town centre ~~area~~ and at its edges. In order to ensure development ~~interfaces well~~creates a positive relationship with the public realm, special attention should be given to design at the ground floor and podium levels of buildings.

F. Development proposals ~~will be expected to~~must maximise opportunities to improve the ecological quality and amenity value of the river environment. This includes measures to deculvert and naturalise the River Quaggy and to improve public access to it around Lee High Road.

LEA 3 Strategic Area for Regeneration, Grove Park

A. A Strategic Area for Regeneration is designated in the Local Plan. This covers the entirety of ~~Lewisham's~~ South Area and parts of Grove Park neighbourhood in the East Area, as defined by the Local Plan. A partnership approach will be pursued in order to ensure that public and private sector investment is secured within the area, and that this investment is coordinated to successfully deliver regeneration and area improvements in collaboration with local communities.

B. Development proposals and stakeholders should seek opportunities to tackle inequalities and the environmental, economic and social barriers that contribute to deprivation and the need for regeneration in this area, taking into account policies for the wider Strategic Area for Regeneration in the Borough's south, as set out in Policy LSA2 (Strategic Area for Regeneration).

LEA 4 Linear network of green infrastructure

A. The East Area contains a linear network of green infrastructure that will be protected and enhanced~~, in line with other Local Plan policies~~. Development proposals ~~should~~ must respond positively to the linear network of green infrastructure and its multifunctional value, with reference to Policy GR1 (Green infrastructure and Lewisham's Green Grid). This includes ~~as~~ its role as a vital environmental and recreational asset within the Borough and ~~defining~~ feature ~~of~~ which contributes to the distinctiveness of the Blackheath, Lee and Grove Park neighbourhoods.

Commented [NE776]: Respond to consultation – strengthen policy by acknowledging the multifunctional benefits of green infrastructure, in line with other policies

B. Development proposals should maximise opportunities to reinforce and enhance the character, amenity and environmental value of the linear network of green infrastructure, including by:
    a. Integrating greening measures to enhance existing green linkages, and create new linkages, between the different elements of green infrastructure within the area, particularly to support the achievement of a continuous linear and connected ecological network;

b. Seeking opportunities to restore or introduce habitats, particularly priority habitats, to support species and enhance the biodiversity value of the network;
c. Maintaining and enhancing the Green Chain walk as a key route for public access to and between spaces within the network;
d. Making provision for safe public access to and throughout the network, where appropriate, including by improving or introducing walking routes and cycleways ~~routes~~, pathways and access points, such as gates; and
e. Ensuring that development is designed in a manner that is sensitive to character of the network and the landscape setting.

C. The effective management of the linear network of green infrastructure, including initiatives that promote interpretation and appreciation of the network (including its local, historical and ecological significance), will be encouraged.

~~LEA5 East Lewisham links~~

~~A. Development proposals will be expected facilitate the creation and enhancement of the East Lewisham Links, a connected network of high quality walking and cycle routes linking key routes, public open spaces and other key destinations across the East area.~~

~~B. On sites located adjacent to an existing or proposed route of the East Lewisham Links, or where an existing or proposed route runs through a site, development proposals must contribute to the delivery of a high quality public realm, giving priority to movement by walking and cycling, in line with Policy QD3 (Public realm) and TR3 (Healthy streets and part of healthy neighbourhoods). Proposals will be expected to deliver public realm improvements to support the delivery of the East Lewisham Links, the specific nature of which will be considered on a site-by-site basis, and may include contributions towards:~~
~~a. New or enhanced footpaths or cycleways;~~
~~b. Road realignment;~~
~~c. Street crossings or other safety measures;~~
~~d. Cycle parking;~~
~~e. External lighting;~~
~~f. Landscaping;~~
~~g. Tree planting or other green infrastructure;~~
~~h. Drinking water fountains;~~
~~i. Public conveniences;~~
~~j. Way-finding signage.~~

~~C. To support the effective implementation of the East Lewisham Links, development proposals will be expected to have regard to the Council's Parks and Open Spaces Strategy.~~

Commented [NE777]: Absorbed into new borough-wide Lewisham Links policy – see Part 2, Policy GR4. However, sub-area section supplemented with a new map of the links

Lewisham's East Area

16.9. Lewisham's East Area is largely made of up the historic villages that formed along the route to Greenwich. These greatly influenced the area's development

and the predominantly suburban character that persists today. The East Area will play a more complementary role in accommodating the Borough's future growth. This is owing to its expansive historic and natural environments along with the scarcity of large development sites. Together these factors limit opportunities for bringing forward substantial new development. Yet generating investment to improve the quality of neighbourhoods and opportunities for local people remains a priority. This is particularly in the Borough's Area for Regeneration, which extends to parts of Grove Park, where interventions are required to address the causes of deprivation. The Local Plan sets out a strategy to help facilitate new investment within the East Area, maximising opportunities that are available whilst ensuring growth is effectively coordinated, with a clear framework that responds to the area's valued built and natural assets. This includes Blackheath and the Maritime Greenwich World Heritage Site Buffer Zone.

16.10. Town and local centres present the main opportunities for accommodating growth and securing new investment. The East Area's strategic development sites are generally located within or around these centres. There is significant potential to reinforce the role of Lee Green District Centre through targeted renewal. It contains a number of sites, including the Leegate Shopping Centre, whose comprehensive redevelopment will significantly enhance the place qualities of the centre whilst delivering new housing, improved retail provision and community facilities. There are also a number of local centres that play a vital role as community hubs serving the area's neighbourhoods, and where new development can help to support their long-term vitality and viability. This includes Grove Park, ~~Burnt Ash~~ Lee Station and Staplehurst Road. Blackheath Village is an important visitor destination whose strategic role as a Night Time Economy hub is supported through the plan.

16.11. To make the best use of land and maximise opportunities for new investment in the East Area, the Local Plan seeks to facilitate the intensification of its neighbourhoods. The development of small housing sites provides a key means to realise the sensitive intensification of established residential areas. The Lewisham Characterisation Study (2019) has informed this approach and is useful in indicating where there is such scope in the East Area. We ~~will~~ have prepared ~~a~~ the Small Sites ~~Supplementary Planning Document~~SPD to identify opportunities and to help ensure that all such development responds positively to its local context. Intensification of employment land is also promoted, particularly to deliver new workspace and secure the long-term viability of employment sites. Site intensification will be delivered primarily through the co-location of employment and other compatible uses on LSIS at Blackheath Hill and Manor Lane.

Commented [NE778]: Factual update

16.12. The Local Plan seeks to deliver a well-integrated network of high quality walking and cycle routes. The main aim is to realise a significant shift in journeys made by vehicles to more sustainable modes. The transformation of the South Circular (A205, Baring Road) and Lee High Road (A20) into Healthy Streets underpins this approach. These are principal movement corridors within the East Area, and have potential for accommodating growth and improving connections between neighbourhoods and places. Elsewhere, the Healthy Streets Approach will be supported in order to deliver high quality walking and cycling corridors thorugh the East Area from Blackheath Village, via Lee Road, through Lee Green

junction, along Burnt Ash Road and Baring Road up to and including Grove Park town centre.

Commented [NE779]: Respond to consultation – to clarify expectations around implementation of healthy streets approach in east area

16.13. The linear network of green infrastructure is a defining feature of the Blackheath, Lee and Grove Park neighbourhoods and contributes to the East Area's distinctiveness. The network includes an expansive series of open spaces and parks, nature conservation sites and the river corridor, along with walking and cycle routes that are of strategic importance, including the Green Chain Walk. It is imperative that the environmental and place qualities of this network of green infrastructure are protected and enhanced. The Local Plan sets the strategic priorities for the network which community groups, including neighbourhood forums, are encouraged to support, whether through community projects or neighbourhood plans. The East Lewisham Links are centred on the network of green infrastructure, recognising the priority given to improving public access to it, particularly by walking and cycling.

Figure 16.1 East Area

Figure 16.2 East Area key diagram

Figure 16.3 East Area Lewisham Links

Figure 16.~~3~~4 East Area site allocations

Site allocations

Note: For the text only version of the Local Plan: Main Issues and Preferred Approaches document, the East Area site allocations are included ~~in a separate~~at the end of this document.

17 Lewisham's South Area

Context and character

17.1. Lewisham's South 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. The South Area contains a number of historic buildings and Conservation Areas that also contribute to its local character.

17.2. The South Area includes the district town centre of Downham that serves ~~the~~ local ~~catchment,~~neighbourhoods however it has a more limited range of shops and services ~~and convenience shopping compared to~~ than 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 ~~serving the immediate localities~~, with comparatively fewer community facilities and ~~limited~~ 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 has a relatively low population density and has not benefitted from the same level of outside investment as other parts of the Borough owing, in part, to the lack of strategic development sites.~~ The area experiences some of the Borough's highest levels of deprivation with some localities ranking within the 20 per cent most deprived in the country.

17.3. 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~~ There are low levels of public transport access~~ibility~~ throughout the area and barriers to movement between key destinations. ~~Along many of the key movement corridors there is a poor~~ public The quality of the public realm is poor along key routes~~, including along~~ such as Bromley Road, Southend Lane, Perry Hill, and Stanton Way, with many of these ~~routes~~ roads dominated by ~~vehicular traffic~~ vehicles.

17.4. In addition to established residential areas t~~T~~he Bell Green neighbourhood ~~is known for its~~ contains an expansive out-of-centre retail park, which includes~~ing~~ ~~a superstore and other~~ large format ~~outlets~~commercial buildings~~, as well as their~~and associated ~~surface~~ car park~~sing~~. These retail uses are adjoined by ~~two~~ the site of a former gas holders~~,~~ which ~~are prominent local landmarks~~has been dismantled. ~~Some contemporary blocks of flats have been~~Several developments~~ed~~ have recently been built around ~~on~~ the edges of ~~these Bell Green sites~~the retail park ~~however new development has generally been delivered in a piecemeal way~~.

17.5. The South 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 of significant ecological and biodiversity value, along with public access to the Waterlink Way. Beckenham Place Park is emerging as a key visitor destination in London ~~and the wider southeast,~~ and has recently received significant investment, including by a new outdoor swimming pond, landscape and public realm improvements.

Vision

17.6. By 2040 the distinctive character of the South area, derived from its open spaces, river valleys and garden city / cottage estates, will be celebrated and reinforced. These assets and features will provide the wider setting for regeneration, building on new and improved transport links, including the Bakerloo line extension and cycleways. The role and character of large tracts of commercial land in Bell Green and Lower Sydenham, along with ~~the~~ major roads ~~that adjoin them~~, will be re-imagined to provide a high quality, mixed-use neighbourhood. This new focus for community and commercial activity in Lewisham will act as a catalyst for growth and investment. Stakeholders will work together and alongside communities to deliver improvements that address the causes of deprivation in the Borough's south, opening opportunities for everyone to benefit from.

17.7. The regeneration of brownfield sites in Bell Green and Lower Sydenham will deliver a significant amount of new housing, including a high proportion of genuinely affordable housing, workspace and jobs, community facilities and open space. A new mixed-use neighbourhood, focussed around a new local centre, will be created through the redevelopment of out-of-centre retail buildings, the former

gasholders, industrial land around Stanton Way and other sites. This will be coordinated by a masterplan, ~~informed by~~prepared through consultation with the local community, ensuring the area is well integrated with existing neighbourhoods and communities. The garden city ~~/~~and cottage character of neighbourhoods in Bellingham and Downham will be reinforced, with their sensitive intensification providing for area improvements~~,~~ and helping to ensure people have access to high quality housing and living environments.

17.8. The A21 (Bromley Road) and Ringway (Southend Lane and Whitefoot Lane) corridors will be transformed ~~into~~ through the ~~'H~~Healthy S~~s~~treets~~'~~ Approach. ~~that~~ This will better connect neighbourhoods~~,~~ with public realm enhancements that make walking, cycling and the use of public transport safer and more convenient. Along these corridors, opportunities will be taken to renew brownfield land and underused sites to create new homes, jobs and community facilities. New development within and around ~~the~~ town and local centres along the corridors, such as Downham D~~d~~istrict C~~c~~entre and Southend Village, will help them to become more thriving and vibrant places.

17.9. Residents and visitors will benefit from excellent access to high quality parks, open and green spaces. Beckenham Place Park will continue to evolve as one of the Borough's most important green spaces and a key visitor destination in south London. The river valley network will have greater prominence. Improvements to the environmental quality and amenity value of the Ravensbourne and Pool rivers will be realised through their re-naturalisation. Waterlink Way and the Pool River Linear Walk, along with the Green Chain Walk, will be enhanced to form key features of a network of walking routes and cycleways ~~routes~~ that link open and green spaces both within and outside of the Borough.

Figure 17.1: South area

Key spatial objectives

To achieve this vision our key spatial objectives are to:

1. Secure the delivery the Bakerloo line extension and other infrastructure to significantly improve transport accessibility, address existing barriers to ~~access~~ movement and unlock the area's development potential.

2. Coordinate new investment in the Bell Green and Lower Sydenham area to enable it to become a London Plan Opportunity Area in a future update to the London Plan.

3. Deliver the regeneration of the former gasholders, Bell Green Retail Park and other sites nearby to create a new high quality residential-led mixed-use area, with a new Local Centre, that is well integrated with existing neighbourhoods and communities. Preserve and enhance the heritage value of the Livesey Memorial Hall and Gardens whilst creating a more positive relationship with the buildings and spaces surrounding them.

4. Develop decentralised energy networks~~,~~ by taking advantage of opportunities presented by the redevelopment of larger sites around Bell Green ~~/~~and Lower Sydenham.

5. Create a high quality employment-led, mixed-used~~, employment led~~ quarter through the renewal of industrial land at Stanton Way and Worsley Bridge Road.

6. Transform the Ringway ~~c~~Corridor (Southend Lane and Whitefoot Lane) and the A21 ~~c~~Corridor (Bromley Road) ~~into~~ by applying the ~~'~~H~~h~~ealthy S~~s~~treets' Approach, with public realm improvements that make walking, cycling and use of public transport safer and more convenient. Address severance caused by the Bell Green gyratory.

7. Enhance the place qualities of the Ringway and A21 C~~c~~orridors by integrating new high quality housing development and revitalising centres along ~~it~~them, particularly to secure the long term viability of Downham district centre.

8. Reinstate and enhance the historic character and identity of Southend Village and its surrounds, building on the presence of local assets including the Green Man centre and Peter Pan pond, and through the redevelopment of the out-of-centre retail park opposite~~(Homebase) site~~.

9. Maintain the ~~'~~garden city' and cottage estate character of residential areas in Bellingham and Downham~~. At the same time,~~ whilst attracting inward investment and delivering new homes through their sensitive intensification.

~~9.~~10. Enhance the place qualities of Perry Rise (B227), Perry Hill (A212) and Alan Pegg Place by applying the Healthy Streets Approach, including by creating a safer and more coherent public realm at their convergence. Reinforce and enhance the character of established residential areas around Perry Hill and Perry Vale and deliver new homes through their sensitive intensification.

Commented [NE780]: Respond to consultation – request for more detail on objectives this part of the sub-area

~~10.~~11. Support ~~balanced~~ inclusive and mixed neighbourhoods and communities by effectively managing Houses in Multiple Occupation and preventing ~~against~~ the~~ir~~ harmful overconcentration of HMOs.

~~11.~~12. Protect and enhance open and green spaces, including by expanding the role of Beckenham Place Park as a key visitor destination. Deliver the Lewisham Links, a connected network of high quality walking routes and cycle routesways ~~that~~ link these spaces, taking advantage of the Green Chain Walk.

~~12.~~13. Enhance the environmental quality and amenity value of the Ravensbourne and Pool Rivers. Improve public access to the rivers with new and improved routes and public realm enhancements, focussing on Waterlink Way and the Pool River Linear Park.

Figure 17.2: South Area key diagram

LSA 1 South Area place principles

~~A. Development proposals must make the best use of land in helping to facilitate Good Growth and focussed regeneration, particularly to tackle inequalities and the environmental, economic and social barriers that contribute to deprivation locally. This will require that investment is appropriately coordinated within Lewisham's South Area and that:~~

~~a. The out-of-centre Retail Park, former Gas Works and other sites at Bell Green and Lower Sydenham are comprehensively redeveloped to create a new high quality residential, mixed-use neighbourhood that is well integrated with its surrounding neighbourhoods;~~

~~b. New development is directed to the A21 corridor (Bromley Road), including for high quality housing, workspace, town centre and community uses, along with supporting infrastructure;~~

~~c. Opportunities are taken to deliver new high quality housing, along with new or improved community facilities, through the sensitive intensification of sites within established residential neighbourhoods;~~

~~d. New employment development is concentrated within town centres and Locally Significant Industrial Sites;~~

~~e. Opportunities are taken to deliver new and improved workspace through the intensification of sites and renewal of industrial land, as well the redevelopment of the sites at Bell Green and Lower Sydenham, along with improving the environmental quality of employment locations;~~

~~f. Land is safeguarded to secure the delivery of strategic transport infrastructure, including the Bakerloo line extension south to Hayes, in line with Policies TR1 (Sustainable transport and movement) and TR2 (Bakerloo line extension).~~

Commented [NE781]: Removed to reduce repetition – these points are covered both in Policy OL1 and the key spatial objectives above. A new Criterion (A) has been written to ensure developments engage with these objectives.

A. Development proposals must contribute to the delivery of Good Growth with reference to Policy OL1 (Delivering an Open Lewisham) and in doing so, demonstrate how they have responded positively to and will support the achievement of the key spatial objectives for the South Area.

B. Development proposals ~~on strategic and other sites~~ within the ~~Bell Green and Lower Sydenham~~South A~~a~~rea must demonstrate how they will help to tackle inequalities and the social, economic and environmental barriers that contribute to deprivation~~positively contribute to a coordinated process of local area regeneration~~, in line with ~~Policy~~ Policies LSA2 (Strategic Area for Regeneration) and LSA3 (Bell Green and Lower Sydenham).

C. Development proposals ~~should~~ must optimise the use of land ~~and capacity of sites,~~ taking into account the Bakerloo line extension and other infrastructure that will enable significant ~~future~~ improvements to ~~public~~ transport access~~ibility levels~~ in the South Area. The Council will seek that development is appropriately phased in order to ensure there is adequate infrastructure capacity in place, including transport and community infrastructure, to cope with the additional demands generated by new development, in line with other Local Plan policies.

D. Development proposals ~~should~~ must respond positively to distinctive and historic character of Southend Village and its surrounds~~, and~~. They should seek opportunities to enhance ~~its~~ the unique place qualities, commercial and community functions of the Village, ~~having regard~~with reference to Policy LSA3 (A21 C~~c~~orridor / Bromley Road).

E. Opportunities should be taken to direct new investment to the established residential neighbourhoods of Bellingham and Downham, including new high quality housing, ~~enhanced~~ provision of community infrastructure ~~facilities~~ and public realm improvements. The sensitive intensification of these neighbourhoods~~, including through the infilling of sites,~~ will be supported where new development responds

positively to their distinctive local and historic character. This includes the predominant ~~'~~garden city~~'~~ ~~principles~~ and cottage estate character associated with the London County Council estates. ~~The Council will prepare a Small Sites Guidance SPD, which development proposals must have regard to.~~

F. Development proposals ~~should~~ must respond positively to the role of Downham D~~d~~istrict C~~c~~entre in supporting local neighbourhoods and communities, particularly for ~~meeting the~~ day-to-day shopping and service needs ~~of the local area~~. A wide range of commercial, leisure, ~~and~~ community and cultural uses will be supported within the centre in order to secure its long-term vitality and viability. Development proposals will be supported where they:
    a. Retain or re-provide units ~~for appropriate~~ suitable to accommodate main town centre uses, particularly for ~~A1~~ Class E retail uses; and
    b. Are designed to e~~E~~nhance the quality of the streetscape, ~~and~~ townscape, ~~along with the~~and environment~~al quality of the centre~~, including through the improvements to shopfronts and the public realm.

G. Bellingham ~~will be~~is designated ~~as~~ a L~~l~~ocal C~~c~~entre reflecting the role it plays in the provision of local shops, services and community facilities, along with its accessible location near Bellingham station and the A21 C~~c~~orridor. To help secure the long-term vitality and viability of the ~~local~~ centre, development proposals ~~should~~ must be designed to:
    a. ~~Enhance~~ Improve access to and along the centre and station approach, including ~~by improving~~ public realm enhancements that make ~~and the legibility of~~ walking routes and cycleways safer and more legible ~~routes~~; ~~and~~
    b. Enhance the character of the area through townscape and streetscape improvements, including to shopfronts; and
    ~~b.~~c. ~~and~~ Facilitate the renewal of employment land at the southern end of Bromley Road ~~Strategic Industrial Location~~SIL, particularly at the junction at Randlesdown Road.

H. Development proposals ~~should~~ must contribute to ~~supporting~~ inclusive and mixed neighbourhoods and communities, including by protecting family housing and ~~preventing against~~ensuring there is no harmful overconcentration of Houses in Multiple Occupation ~~in the local area~~, ~~having particular regard~~with reference to Policy HO8 (Housing with shared facilities).

I. Development proposals ~~should~~ must help to ensure the South Area benefits from a high quality network of walking routes and cycleways ~~connections and routes~~ that ~~better link~~connect neighbourhoods and places, including green spaces and waterways, ~~having regard~~with reference to Policy ~~LSA4~~ GR4 (~~South~~ Lewisham Links). They should maximise o~~O~~pportunities to enhance or introduce new cycleways~~introduce cycle routes, including Quietways, should be maximised~~, particularly in the established residential areas ~~where~~ with wider street layouts ~~are well suited to accommodating routes~~.

J. Public realm and access improvements should be introduced along the A21 C~~c~~orridor / Bromley Road (including active frontages uses along the edge of the

Commented [NE782]: Removed to avoid repetition – covered in Housing policies

Bromley Road retail park and the bus garage) and in Bellingham town centre (including active frontages and shopfront improvements to the parade of shops to the east of Bellingham station and on Randlesdown Road).

~~J.~~K. The Council will work with Network Rail and other stakeholders to investigate the feasibility of delivering improvements to the bridge at Southend Lane to address issues of safety and movement within the area, including options for widening the bridge and increasing its height.

Commented [NE783]: Respond to consultation – signposted project

~~K.~~L. 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 to ensure the park is maintained as a high quality open space of regional significance, and a key leisure and visitor destination in London and the wider southeast. 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. This includes consideration for the un-adopted walkway on Bromley Road and other links at the east side of the park. The Council will work with stakeholders to deliver flood alleviation measures at the park, in line with the River Corridor Improvement Plan SPD.

Commented [NE784]: Respond to consultation – added to signpost opportunity for improvement

~~L.~~M. The river valley network is a defining feature of the South Area which development proposals ~~should~~ must respond positively to by:

a. Ensuring that development is designed to improve the ecological quality of the Ravensbourne and Pool rivers, including by naturalising the rivers, wherever opportunities arise;
b. 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
c. Facilitating the provision of new and enhanced connections to and along, and wherever possible across, the rivers and river valleys, including by improving the Waterlink Way and access to the Pool River Linear Park.

~~M. A partnership approach will be pursued to help facilitate local area regeneration, particularly to deliver strategic transport infrastructure. This includes infrastructure necessary to ensure the development potential of the Bell Green / Lower Sydenham area can be fully realised, including:~~

~~a. The Bakerloo line extension to Hayes, including required station improvements; and~~
~~b. Improvements at key junctions to enhance safety for all road users, including at the Bell Green gyratory.~~

~~N. The Council has prepared evidence base documents and planning guidance to assist with understanding of the distinctive characteristics of the neighbourhoods and places within the South Area, and to help ensure coordination in the delivery of new investment. Development proposals should have regard to and positively engage with these documents, including:~~

~~c. Lewisham Characterisation Study (2019);~~

~~d. A21 Design Guidance SPD (forthcoming);~~
~~e. Bell Green and Lower Sydenham Area Masterplan and/or SPD (forthcoming);~~
~~f. Small Sites Guidance SPD (forthcoming); and~~
~~g. River Corridor Improvement Plan SPD (2015).~~

Commented [NE785]: Repetition – covered elsewhere in plan

Figure 17.3: Strategic Area for Regeneration

LSA 2 Strategic Area for Regeneration

A. A Strategic Area for Regeneration is designated in the Local Plan. This covers the entirety of the South Area and parts of Grove Park neighbourhood in the East Area. A partnership approach will be pursued in order to ensure that new public and private sector investment is secured within this area, and that this investment is coordinated to successfully deliver regeneration in collaboration with local communities.

B. In order to tackle inequalities and the environmental, economic and social barriers that contribute to deprivation and the need for regeneration in this area, stakeholders and development proposals should seek opportunities to:
   a. Significantly improve transport accessibility in the area, particularly by:
      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 ~~routes~~ connecting to transport nodes, town and local centres, schools and training facilities, and employment locations;
   b. Plan positively for social infrastructure to meet local needs, particularly community facilities and services catered to children and young people;
   c. 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;
   d. Improve the environmental quality of neighbourhoods, including by reducing and mitigating air and noise pollution along main roads and junctions; and
   ~~d.~~e. Address deficiencies in access to open space by making provision for new and improved publicly accessible open space and improving links to green and open spaces~~;~~.

Commented [NE786]: Respond to consultation – signpost open space deficiencies in the area and support action to improve this

C. Investment to support the achievement of safe, healthy and liveable neighbourhoods within the Strategic Area for Regeneration should be facilitated through a variety of approaches, including:~~:~~
   a. Partnership working ~~with~~ between key stakeholders to secure the delivery of new and improved infrastructure in Lewisham, including transport infrastructure such as the Bakerloo line extension, to significantly improve access to high quality services and community facilities, along with training and employment opportunities, whether within the Borough or elsewhere in London and beyond;~~,~~
   b. The comprehensive redevelopment of ~~strategic~~ site~~s~~ allocations, and renewal of town centres and employment locations, in the Bell Green and Lower Sydenham area, to help shift the focus and spread the benefits of investment southwards within the Borough;,

c. The sensitive intensification of sites and residential neighbourhoods, to support incremental but transformational improvement in the quality of housing and living environments.

LSA 3 Bell Green and Lower Sydenham

A. The designation of an Opportunity Area at Bell Green and Lower Sydenham in a future review of the London Plan will be strongly supported by the Council.

B. To help realise the growth and regeneration potential of Bell Green and Lower Sydenham, and to ensure that ~~future~~ new development within the area supports the delivery of the spatial strategy for the Borough, the Council ~~will~~ intends to prepare a Supplementary Planning Document and/or Masterplan through consultation with the local community. This will complement the Local Plan in setting a long-term development and investment framework for the area. ~~Development proposals must be delivered through the masterplan process, and in accordance with relevant site allocation policies and guidance documents.~~ Development proposals must demonstrate how they have engaged positively with planning guidance endorsed or adopted by the Council.

C. To ensure that regeneration in Bell Green and Lower Sydenham is delivered ~~through~~ in a coordinated ~~process of targeted investment and managed change~~ manner, development proposals ~~will be required to~~ must:

a. ~~Safeguard the land required to secure~~Ensure that development will not prejudice the delivery of the Bakerloo line extension ~~south to Hayes, and~~, taking into account any Ministerial Safeguarding Directions and Mayor of London / Transport for London infrastructure requirements and/or feasibility studies associated with BLE Phase 2, with reference to Policy TR2 (Bakerloo line extension);

~~a.~~b. ~~O~~optimise the capacity of sites having regard to future improvements in ~~p~~Public ~~t~~Transport A~~a~~ccess~~ibility~~ L~~l~~evels enabled by ~~this~~ the BLE and other transport infrastructure~~, in line with other Local Plan policies~~;

~~b.~~c. Deliver the comprehensive redevelopment of ~~strategic sites in accordance with site allocation policies, including~~ the former Bell Green gas holders, Bell Green Retail Park~~,~~ and Sainsbury's Bell Green, and through this process make provision for a residential-led mixed-use quarter with a distinctive urban character that is supported by a new Local Centre, the scale of which is informed by a Retail Impact Assessment;

~~c.~~d. Protect the employment function of the ~~Locally Significant Industrial Sites~~LSIS at Stanton Square and Worsley Bridge Road, whilst ~~seeking to deliver new high quality workspace, taking into account~~ exploring opportunities to deliver new high quality workspace, including through ~~for~~ the co-location of employment and other compatible uses;

e. ~~Facilitate the delivery of~~ Deliver public realm improvements to help reduce car use and barriers to movement, improve permeability and enhance the walking and cycle environment, particularly around the Bell Green gyratory and along major ~~routes~~roads, including the A212 (Sydenham Road, Bell Green Lane, Perry Hill), A2218 (Stanton Way, Southend Lane) and Worsley Bridge Road;

Commented [NE787]: Respond to consultation – to reflect that BLE Phase 2 route has not been confirmed and only Phase 1 currently benefits from the Safeguarding Direction

Commented [NE788]: To reflect the appropriate level of town centre designation, as supported by the Retail Impact Assessment and Town Centre trends study

~~d.~~f. Enable the reconfiguration, re-routing and/or redesign of roads where this is necessary to support the area masterplan; and

~~e.~~g. Ensure adequate provision of infrastructure, including community facilities, taking into account existing need and any additional demand arising from new development.

D. Development proposals should contribute to enhancing the place qualities of Bell Green and Lower Sydenham, including by:

~~a. Renewing brownfield land, such as underused and vacant sites, to create a new high quality, residential-led mixed use quarter with a distinctive urban character that relates positively to its surroundings;~~

~~b.~~a. Ensuring that the layout and design of development improves permeability and circulation within the local area, and promotes the area's integration with surrounding neighbourhoods and places. This includes enhanced walking routes and cycleways ~~routes~~ to Sydenham town centre and new connections to Bellingham, over the Pool River where feasible;

~~c.~~b. Integrating new publicly accessible open space into development;

~~d.~~c. Responding positively to heritage assets and their setting, including the Livesey Hall War Memorial and gardens; and

~~e.~~d. Maximising opportunities to improve the ecological quality and amenity value of the river environment, including by enhancing access to Riverview Walk and Pool River Linear Park, and securing views to the Pool River.

~~E. Through the preparation of the Local Plan, consideration will be given to the designation of a new town centre in the Bell Green and Lower Sydenham area. This centre will support the new mixed-use neighbourhood to be delivered through the comprehensive regeneration of sites, and reconfiguration of existing out-of-centre retail provision. The centre's role and function (i.e. position within the Borough's town centre hierarchy) will be established having regard to further detailed assessments and public consultation.~~

LSA 4 A21 C~~c~~orridor / Bromley Road

A. The transformation of the A21 C~~c~~orridor (Bromley Road) and its immediate surrounds into a ~~series~~ network of liveable, healthy neighbourhoods with a distinctive urban character is ~~a strategic priority~~ integral to the delivery of the spatial strategy. Development proposals ~~should make the best use of land to enable delivery of high quality, mixed-use residential quarters within this South Area location. They should also reinforce and enhance the corridor's movement function, ensuring it supports a wider network of well-connected neighbourhoods and places.~~ must demonstrate how they have responded positively to the A21 Development Framework through the design-led approach.

B. Development proposals along the A21 C~~c~~orridor and its immediate surrounds ~~should~~ must contribute to enhanc~~e~~ing the place qualities of the C~~c~~orridor by:

Commented [NE789]: Respond to consultation – recognition that significant changes or improvements to road network may be required to realise the objectives for the area

Commented [NE790]: Addressed in C.b above, some text moved

Commented [NE791]: Latest Retail Impact Assessment and Town Centre Trends Study indicates scope for Local Centre is appropriate – this is reflected in amended policy point C.c above

Commented [NE792]: To refer the A21 Development Framework and ensure this informs the design

a. Responding positively to the evolving urban character of the area~~, including~~ through the sensitive intensification of ~~strategic and other~~ sites, ~~having regard to the A21 Design Guidance SPD~~ where appropriate;
b. Helping to establish a distinctive and legible urban grain along and around the C~~c~~orridor, including clusters of development of an urban scale situated at major road junctions, particularly at Southend Lane;
c. Ensuring new development ~~interfaces well~~reinforces or creates a positive relationship with the public realm, including through the provision of positive frontages along the C~~c~~orridor, and active ground floor frontages incorporating commercial and community uses, where appropriate, including at Southend Village and Downham ~~district~~ District ~~town~~ C~~c~~entre ~~and its edges~~;
d. Maximising opportunities to integrate urban greening measures; and
e. Enhancing connections between neighbourhoods along and surrounding the C~~c~~orridor through the delivery of new and improved public realm.

C. Development proposals ~~should~~ must respond positively to the distinctive and historic character of Southend Village and its surrounds, whilst supporting the long term viability and vitality of the shopping parade by:
a. Enhancing the place qualities of the V~~v~~illage by designing development to create a more coherent urban grain along Bromley Road;
b. Making provision for a complementary mix of main town uses ~~along~~ within the parade ~~at the ground floor level, with positive and active frontages~~; and
c. ~~Enabling I~~improv~~ed~~ing visitor access to Southend Village ~~by enhancing the network of connections within the local area, including provision of legible and safe walking and cycle routes~~ through public realm enhancements:
    i. Around the junctions at Beckenham Hill Road and Southend Lane/Whitefood Lane;
    ii. To and along Coninsborough Crescent; and
    iii. At the route connecting Whitefoot Lane with Beechborough Green and Gardens.

D. Development proposals must reinforce and enhance the role of the A21 as a strategic movement corridor~~, giving priority to safe and convenient movement by walking and cycling, as well as the use of public transport~~ by applying the Healthy Streets Approach. This principal north-south route should be supported by a complementary network of legible, safe and accessible walking routes~~, including~~ and cycleways ~~routes,~~ that link with it to enhance connections between neighbourhoods and places, including open spaces such as Beckenham Place Park, Forster Park, and Downham Fields.

E. Development proposals should investigate and maximise opportunities to reinstate or enhance the network of finer grain east-west connections for walking and cycling to and from the A21 C~~c~~orridor, and the river valley, particularly where sites are to be delivered through comprehensive redevelopment.

~~F. Development proposals on sites along the A21 corridor and its surrounds should be designed having regard to the Healthy Streets principles, in line with Policy TR3 (Healthy streets as part of heathy neighbourhoods).~~

Commented [NE793]: Repetition of B.c above

Commented [NE794]: Repetition - this point is absorbed into D above

~~LSA5 South Lewisham Links~~

~~D. Development proposals will be expected facilitate the creation and enhancement of the South Lewisham Links, a connected network of high quality walking and cycle routes linking key routes, public open spaces and other key destinations across the South area.~~

~~E. On sites located adjacent to an existing or proposed route of the South Lewisham Links, or where an existing or proposed route runs through a site, development proposals must contribute to the delivery of a high quality public realm, giving priority to movement by walking and cycling, in line with Policy QD3 (Public realm) and TR3 (Healthy streets and part of healthy neighbourhoods). Proposals will be expected to deliver public realm improvements to support the delivery of the South Lewisham Links, the specific nature of which will be considered on a site-by-site basis, and may include contributions towards:~~

- ~~a. New or enhanced footpaths or cycleways;~~
- ~~b. Road realignment;~~
- ~~c. Street crossings or other safety measures;~~
- ~~d. Cycle parking;~~
- ~~e. External lighting;~~
- ~~f. Landscaping;~~
- ~~g. Tree planting or other green infrastructure;~~
- ~~h. Drinking water fountains;~~
- ~~i. Public conveniences;~~
- ~~j. Way-finding signage~~

~~F. To support the effective implementation of the South Lewisham Links, development proposals will be expected to have regard to the Council's Parks and Open Spaces Strategy.~~

Commented [NE795]: Absorbed into new borough-wide Lewisham Links policy c– see Part 2, Policy GR4. However, sub-area section supplemented with a new map of the links

Lewisham's South Area

17.10. Lewisham's South Area will play an important role in helping to deliver ~~more~~ inclusive, ~~healthier~~ healthy and liveable neighbourhoods in the Borough. It has the potential to accommodate a significant amount of growth over the plan period. However, the level of this growth will be contingent on the delivery of ~~strategic~~ infrastructure necessary to support both new developments and existing neighbourhoods. This includes transport infrastructure and particularly the Bakerloo line extension. The South Area does not benefit from the same ~~levels of good public transport accessibility~~Public Transport Access Levels as many other parts of the Borough. This is one of the key factors contributing to inequality and the levels of deprivation experienced locally, and the need to designate a Strategic Area for Regeneration. Targeted interventions are required to tackle inequalities and the social, economic and environmental barriers that contribute to deprivation. The Local Plan sets out a strategy to ensure that growth and regeneration in the South Area is effectively coordinated, with a clear framework in place to facilitate the delivery of the Bakerloo line extension ~~to Hayes~~ and maximise opportunities associated with it. ~~It~~ This will require~~s~~ that stakeholders work together and alongside local communities to tackle deprivation by directing investment in a joined up way. The phasing of new development ~~of strategic~~on larger site~~s~~

allocations will be critical to delivering area improvements and transformational change for the benefit of everyone. ~~This is recognising the Bakerloo line extension will open new possibilities for optimising the capacity of sites.~~

17.11. The Bell Green and Lower Sydenham area is poised to become one of London's next Opportunity Areas, and the Council will support this designation in a future review of the London Plan. There are a number of large ~~strategic~~ sites in proximity to one another with the potential to be comprehensively redeveloped. They include the former Bell Green Gas Holders, an out-of-centre retail park and buildings, and several designated employment locations. The Local Plan establishes the principles for their regeneration and renewal. ~~However,~~The Council intends to prepare a more detailed framework ~~will be prepared~~ to ensure coordination between landowners in the delivery of a new high quality, residential-led mixed-use neighbourhood. ~~This will be led by the Council working in collaboration~~ which will be informed by consultation with local communities and other key stakeholders. ~~Particular~~ Development proposals ~~consideration~~ will need to ~~be given to~~address the area's relationship with and connections to Sydenham District Centre. ~~The long-term vitality and viability of the town centre can be aided by improved linkages and a critical mass of new residents/visitors in the south of the Borough.~~

17.12. ~~Through the preparation of the Local Plan, consideration will be given to the designation of A~~a new ~~town~~ Local Ccentre in the Bell Green and Lower Sydenham area will be enabled through the comprehensive redevelopment of the existing out-of-centre retail park and the reconfiguration of commercial uses. ~~The role and function of this centre (i.e. position in the town centre hierarchy) will be established through further detailed assessments, including on the impact on the viability of existing centres, and informed by public consultation. There is potential scope to designate a new District or Local Centre to support the levels of growth planned in the area.~~ A preliminary assessment has considered the potential impacts on existing town centres, such as trade diversion, that might result from the introduction of a new centre at this location.[159] It suggests a Local Centre is appropriate in terms of function and scale, and should principally serve demands generated by new development. Planning applications may be required to include a Retail Impact Assessment to ensure there will be no adverse impact on the vitality and viability of existing centres. The boundaries and frontages of the new Local Centre will be established through the development management process and formalised through a Local Plan review.

Commented [NE796]: To reflect findings of the Retail Impact Assessment and Town Centre Trends Study

17.13. The South Area derives much of its character from the interwar homes constructed by the London County Council, particularly in Bellingham and Downham. The housing estates were influenced by 'garden city' principles and provide for a distinctive but relatively homogenous pattern of lower density development. These neighbourhoods experience some of the highest levels of deprivation in Lewisham. Many localities are within the 20 per cent most deprived in the country. ~~Investment is needed to address inequalities and the causes of deprivation.~~ Given the character of the established residential neighbourhoods and the scarcity of large sites suitable for redevelopment, a more tailored approach to investment is required to address inequalities and the causes of deprivation. Area improvements will be generated mainly through the sensitive intensification of

[159] Lewisham Retail Impact Assessment and Town Centre Trends Study (2021).

~~existing~~ established neighbourhoods and collaborative working between stakeholders to deliver new and improved infrastructure. ~~We will prepare a Supplementary Planning Document to identify opportunities and to help ensure that all such development responds positively to its local context.~~

17.14. The Local Plan seeks to deliver a well-integrated network of high quality walking routes and cycleways ~~routes~~ that link to public transport nodes and other key destinations. The main aim is to encourage and enable modal shift ~~realise a significant reduction in~~and to significantly reduce journeys made by car~~s to more sustainable modes~~. The~~is will be supported through the~~ transformation of the A21 (Bromley Road) and Southend Lane ~~into~~ using the Healthy Streets ~~underpins this A~~approach. These ~~are~~ principal movement corridors within the South Area~~, and~~ which have the potential ~~for~~ to accommodating growth, and where new development can deliver public realm enhancements to ~~and~~ improv~~inge~~ connections between neighbourhoods and places. Focussed investment will also help to support the vitality and viability of centres along or in proximity to the routes, including Downham District Centre, Southend Village and Bellingham Local Centre. Regeneration of Bell Green and Lower Sydenham presents opportunities to improve the environment for walking and cycling, particularly at major road junctions, including at Southend Lane.

17.15. The South Area's network of green infrastructure includes parks, open spaces and waterways. Beckenham Place Park is the Borough's largest green space, featuring much ancient woodland, and is an important local asset. A significant amount of investment has been delivered here in recent years and the park will play an increasingly important role as a local and wider regional visitor destination. The river valley network is also a defining feature of the area, with the Ravensbourne and Pool Rivers traversing it. Opportunities must be taken to re-naturalise the rivers wherever ~~opportunities arise~~possible~~, particularly~~ in order to improve their ecological and amenity value. The ~~South~~ Lewisham Links are centred on the network of green infrastructure, recognising the priority given to improving public access to it by walking and cycling. ~~We~~ The Council will work with other local authorities, including Bromley, to investigate opportunities to improve connections from the South Area to green spaces outside of Lewisham.

Figure 17.1 South Area

Figure 17.2 South Area key diagram

Figure 17.3 South Area Lewisham Links

Figure 17.~~3~~4 South Area site allocations

Site Allocations

Note: For the text only version of the Local Plan: Main Issues and Preferred Approaches document, the South Area site allocations are included ~~in a separate~~at the end of this document.

18 Lewisham's West Area

Context and character

18.1. The West Area comprises the ~~nine distinct~~ neighbourhoods~~, including:~~ of Telegraph Hill, Brockley, Ladywell, Crofton Park, Honor Oak, Blythe Hill, Forest Hill, ~~Perry Hill,~~ Sydenham, and Sydenham Hill. These neighbourhoods have a distinctive character ~~largely make up a~~ which is derived their historical development as a series of ~~older~~ villages that ~~run north south which developed~~ formed around ~~key~~ railway stations.

18.2. The area is characterised by its topography with open spaces at high ground providing views towards London and Kent, ~~and~~as well as prominent green spaces with remnants of the Great North Wood. The area remains noticeably wooded, with prominent mature street and garden trees. The railway line dissects the area and limits ~~access~~ movement between many neighbourhoods. However, t~~T~~he sidings and embankments also support a significant variety of biodiversity and wildlife, which reinforce ~~its~~ the area's green character. ~~The area contains the~~The Ravensbourne R~~r~~iver and river valley corridor~~, which~~ provide~~s~~ an important natural corridor through the ~~sub-~~area. Whilst there are many parks and open spaces~~,~~ the number and quality of walking and cycle links between these are varied, and many open spaces are poorly connected.

Commented [NE797]: Respond to consultation – more recognition of topography/ridge, and views across Borough, London

18.3. The residential areas are predominantly low-rise with linear terraces and narrow street sections resulting in relatively high densities. The West~~ern~~ Area has a diverse built character that includes historic Victorian and Edwardian terraces, interwar 'garden city' inspired housing, post-war flats and Council estates, and 20th century infill. There ~~sub-area contains many~~ are a number C~~c~~onservation A~~a~~reas and listed buildings, which strongly inform the character of the area.

18.4. The West A~~a~~rea contains the D~~d~~istrict C~~c~~entres of Sydenham and Forest Hill that have a diverse town centre offer and serve their wider neighbourhood~~s,~~. ~~along~~ There are also a number of ~~with~~ complementary L~~l~~ocal C~~c~~entres and parades catering to the day-to-day needs of residents and visitors. ~~.~~ Some of the area's town centres ~~(such as Ladywell)~~ contain a number of vacant buildings and underused sites, and have a poorer quality public realm. The area has a diverse land use mix, with a strong creative and digital industry clusters in Brockley and Forest Hill with links to Goldsmiths College and Southwark College. The West Area contains the Horniman Museum which is a significant cultural destination within London and the southeast.

18.5. There ~~character~~ West A~~a~~rea has a number of ~~key~~ train stations and transport corridors, including the B218 Brockley Road/Brockley Rise and the A205 South Circular. The public realm is generally of a poorer quality along these roads~~,~~ and ~~roads~~ they are also dominated by vehicles, inhibiting movement by walking and cycling. Whilst many train station~~s~~ are well positioned and in accessible locations, a number of stations have a poor sense of arrival and are not well~~-~~sited within the neighbourhood they serve.

Vision

18.6. By 2040 the historic fabric, landscape and woodland character of the West A~~a~~rea will be reinforced so that its neighbourhoods and centres retain their village qualities, including valued views towards London and Kent. The area will feature a

distinctive, thriving and well-connected network of town and Llocal Ccentres that complement one another. The character and role of the main routes along which centres and train stations are located, including Brockley Rise / Brockley Road (B218), will be re-examined to enhance links between them. The delivery of the Brockley station interchange and other transport improvements will enhance access to central London, opening opportunities for everyone to benefit from.

18.7. The revitalisation of the area's town District and Llocal Ccentres will ensure they remain thriving hubs of community and commercial activity, as well as focal points for new housing, including a high proportion of genuinely affordable housing. Public realm enhancements at the main entrances to the centres, as well as at their stations and approaches, will make them more accessible and inviting places. Forest Hill Ddistrict Ccentre will evolve as a key employment location and lively Cultural Quarter, building on the presence of the Horniman Museum and Gardens and studios at Havelock Walk. New workspace will be delivered through the renewal of industrial sites within and around the centres, particularly at Forest Hill and Upper Sydenham / Kirkdale. The B218 and South Circular (A205) will be transformed into using the 'Hhealthy Sstreets' Approach, with public realm enhancements that make walking, cycling and the use of public transport safer and more convenient. Elsewhere, the character of established residential areas will be reinforced, with their sensitive intensification providing for improvements throughout the wider area.

18.8. Residents and visitors will benefit from excellent access to high quality parks, open and green spaces. Many of these spaces will feature extensive views across Lewisham as well as natural woodland, the remnants of the Great North Wood. The river valley will have greater prominence with the River Ravensbourne better revealed around Ladywell. A connected network of high quality walking routes and cycleways routes will link open and green spaces both within and outside of the Borough.

Figure 18.1: West area

Key spatial objectives

To achieve the vision our key spatial objectives are to:

1. Secure the delivery of the Brockley station interchange to improve transport accessibility and support help ensure growth is appropriately supported by infrastructure.

2. Secure the long-term vitality and viability of the area's network of town District and Llocal centres, and enhance walking and cycling connections between them. Ensure the centres retain their distinctive character and complement each other with a unique offer of shops, services and facilities.

3. Reinforce the role of Sydenham Ddistrict Ccentre in supporting the neighbourhood. Deliver public realm improvements at key arrival points to make the centre a more accessible and welcoming place. Support new high quality development, including mixed-use development, on sites which detract from the distinctive character of the centre.

4. Strengthen and eExpand the role of Forest Hill Ddistrict Ccentre as hub of community, commercial and cultural activity and a key employment location.

Establish a new Cultural Quarter in the area, building on the presence of the Horniman Museum and Gardens and the cluster of creative industries at Havelock Walk and 118 Stansted Road.

5. Strengthen the role of ~~Upper Sydenham /~~ Kirkdale Llocal Cc~~e~~entre in supporting the neighbourhood. Deliver the renewal of industrial land at Willow Way to better complement the centre with new workspace and a wider mix of uses, along with improvements to the townscape and public realm.

6. Enable the delivery of new workspace and housing along with enhancements to the Forest Hill station approach through the renewal of industrial land at Perry Vale and Clyde Vale, as well as the redevelopment of sites around the station.

7. Protect and enhance the employment quarter at Malham Road, including by extending the employment area to include units at 118 Stanstead Road.

8. Transform the South Circular (A205) and Brockley Rise / Brockley Road (B218) ~~into~~ by applying the 'Hhealthy Sstreets' Approach, with public realm improvements that make walking, cycling and the use of public transport safer and more convenient.

9. Protect and enhance open and green spaces, including waterways, along with the distinctive woodland character of the area. Deliver a connected network of high quality walking routes and cycleways ~~routes~~ that link these spaces.

Figure 18.2: West Area key diagram

LWA 1 West Area place principles

~~A. Development proposals must make the best use of land in helping to facilitate Good Growth, including through the focussed renewal of town centres and employment locations. This will require that investment is appropriately coordinated within Lewisham's West Area and that:~~

~~a. The redevelopment of strategic sites, and the renewal of other sites, within and around the area's linear network of town centres is facilitated to better connect the centres and to secure their long-term vitality and viability; in line with Policy LWA2 (Connected network of centres);~~

~~b. New development within and around Forest Hill district town centre supports and reinforces the centre's role as a key commercial, community and cultural hub, in line with Policy LWA3 (Forest Hill district centre and surrounds);~~

~~c. New development is directed to the main corridors of Brockley Road (B218) and Stanstead Road (A205 / South Circular), including for high quality housing, workspace, town centre and community uses, along with supporting infrastructure;~~

~~d. New employment development is concentrated within town centres and the Locally Significant Industrial Sites at Endwell Road, Malham Road, Perry Vale, Clyde Vale and Willow Way;~~

~~e. Opportunities are taken to deliver new and improved workspace through the intensification of sites and renewal of industrial land, including through the co-location of employment and other compatible uses on selected LSIS, along with improving the environmental quality of employment locations;~~

~~f. The Forest Hill Cultural Quarter plays an integral and expanded role in supporting the cultural and creative industries; and~~

~~g. Land is safeguarded to secure the delivery of strategic transport infrastructure, including Brockley Station and Interchange, in line with Policy TR1 (Sustainable transport and movement).~~

Commented [NE798]: Removed to reduce repetition – these points are covered both in Policy OL1 and the key spatial objectives above. A new Criterion (A) has been written to ensure developments engage with these objectives.

A. Development proposals must contribute to the delivery of Good Growth with reference to Policy OL1 (Delivering an Open Lewisham) and in doing so, demonstrate how they have responded positively to and will support the achievement of the key spatial objectives for the West Area.

B. Development proposals must respond positively to the character and heritage value of established residential areas. This includes the historic character of the area's neighbourhoods, and particularly their town centres which are defined by their Victorian shopping parades and make an important contribution to local distinctiveness. The historic landscape character, including woodland and topography, is also a defining feature of the West Area, which was once covered by the Great North Wood. Development p~~P~~roposals ~~will be expected to~~must maximise opportunities to integrate urban greening measures to respond to and connect the remnants of the woodland, along with protecting and enhancing important views and vistas.

C. Development proposals incorporating new or re-purposed workspace should seek to ensure that this provision is designed to accommodate micro, small and medium-sized businesses, to complement and support existing clusters of cultural and creative industries, including in Brockley and Forest Hill.

D. The comprehensive redevelopment of sites within Willow Way LSIS will be supported ~~to~~ where this retains and enhances industrial capacity and local employment provision, as well as ~~to~~ improves the quality of the environment~~al~~ and ~~visual quality of~~townscape ~~the neighbourhood area~~. Development proposals within the LSIS ~~should positively address the site's relationship~~ must ensure the design provides for a positive relationship with ~~Upper Sydenham/~~Kirkdale L~~l~~ocal C~~c~~entre, particularly to ensure ~~compatible land uses~~the protection of amenity as well as to maximise opportunities to create safe and legible ~~connections~~routes between and around the LSIS and the Local Centre. Development proposals ~~should~~ must deliver high quality designs that help to establish a more cohesive, employment-led mixed-use quarter.

E. The sensitive intensification of established residential neighbourhoods will be supported where new development responds positively to their distinctive local and historic character, including the landscape setting. ~~The Council will prepare a~~Development proposals must have regard to the Small Sites ~~Guidance~~ SPD, where appropriate ~~which development proposals should have regard to~~.

F. Development proposals ~~should~~ must help to ensure the West Area benefits from a high quality network of walking routes and cycleways ~~connections and routes~~ that ~~better link~~connect neighbourhoods and places~~,~~ including green spaces and waterways, ~~having regard~~with reference to Policy ~~LWA4~~ GR4 (~~West~~ Lewisham Links). ~~Particular~~ C~~c~~onsideration should be given to improving ~~linkages~~ connections between ~~and access to strategic regional~~ parks and open spaces that are located

outside of the Borough, but which are within comfortable walking or cycling distance from the West area.

G. Development proposals must respond positively to the historic character and setting of the Horniman Museum and Gardens, particularly to support its role as a key visitor destination within London and the southeast. Development pProposals within the vicinity of the museum should provide for public realm enhancements to improved way finding and access routes to and from the museum.

H. Development proposals should investigate opportunities for the comprehensive redevelopment of strategic site allocations and other sites, particularly within and around Sydenham and Forest Hill district centres, in order to make the most optimal use of land and support the delivery of the spatial strategy.

I.H. Development proposals should tomust contribute to delivery of high quality public realm using the Healthy Streets Approach. , Pparticularly consideration should be given to enhancements on andat station entrances and around their approaches to and from train stations, and along key movement routes corridors including Ladywell Road, the South Circular (A205), Sydenham Road, Dartmouth Road, and Brockley Road/Brockley Rise, and Drakefell Road/Gellatly Road.

J. The Council has prepared evidence base documents and planning guidance to assist with understanding of the distinctive characteristics of the neighbourhoods and places within the West Area, and to help ensure coordination in the delivery of new investment. Development proposals should have regard to and positively engage with these documents, including:

a. Lewisham Characterisation Study (2019);;
b. Bell Green and Lower Sydenham Area Framework and/or SPD (forthcoming); and
c. Small Site Guidance SPD (forthcoming).

Commented [NE799]: Repetition – this is covered elsewhere in the plan including site allocations, Policy OL1 spatial strategy, area spatial objectives, etc.

Commented [NE800]: Repetition – deleted to make more concise, covered elsewhere in the plan

LWA 2 Connected network of town centres

A. The West Area contains an historic network of town and local centres that serve its neighbourhoods and communities. Development proposals should must respond positively to this network and help to secure the long-term vitality and viability of the centres by:

a. Preserving and enhancing their distinctive and historic character, including townscape, building and shopfront features;
b. Making provision for a wide range of appropriate main town centre uses that build on the economic strengths and unique attributes of each of the centres, whilst seeking to ensure they complement and do not compete with one another; and
c. Improving connections between the centres by:
    i. Delivering public realm enhancements to facilitate safe and convenient movement by walking and cycling along main roads and routes linking the centres; and
    ii. Making provision for highly accessible, safe and attractive interchanges at key public transport nodes, including stations.

B. Brockley Cross, Crofton Park, Honor Oak / Brockley Rise and ~~Upper Sydenham/~~Kirkdale and Ladywell ~~will be~~are designated as L~~l~~ocal C~~c~~entres reflecting the complementary role each plays in the provision of local services and community facilities within their neighbourhoods.

C. Within the West Area's town and local centres, development proposals for meanwhile uses on vacant sites and properties will be supported in order to facilitate their return to active use, in line with Policy ~~EC22~~ DM5 (Meanwhile uses). Meanwhile uses of spaces catered for micro businesses, including independent traders, and community uses will be strongly encouraged.

D. Development proposals should support the growth and evolution of Forest Hill district centre and its surrounds as a key hub of creative, cultural and community activity, in line with Policy LWA2 (Forest hill district centre and surrounds).

E. The renewal of Sydenham D~~d~~istrict ~~town~~ C~~c~~entre ~~to~~ will be supported in order to secure its long-term vitality and viability. Development proposals ~~will be expected to~~should contribute to the renewal and revitalisation of the town centre by:
   a. Seeking opportunities to repair the structure and fabric of the centre through the sensitive redevelopment and infilling of sites, particularly those which detract from the historic character and urban grain that is still evident;
   b. Delivering public realm improvements to make the centre a more accessible, welcoming and attractive place to visit, particularly at key arrival points around Sydenham station and at the western and eastern edges of the centre, along Kirkdale and Sydenham Road; and
   c. Making provision for a diverse mix of main town centre uses (including shops, services and community facilities) that reinforce the role of the centre in Lewisham's town centre hierarchy, and ensure it both supports and complements significant new development planned ~~on strategic sites~~ in the Bell Green and Lower Sydenham area.

F. The renewal of ~~Upper Sydenham/~~Kirkdale L~~l~~ocal C~~c~~entre will be supported in order to secure its long-term vitality and viability. Development proposals ~~should contribute to a coordinated process of~~must contribute to area improvements~~,~~ through high quality designs that help~~ing~~ to ~~deliver~~ create a more cohesive and ~~complementary~~ positive relationship between the centre and neighbouring properties and sites, including the Willow Way ~~Locally Significant Industrial Site~~LSIS and redeveloped former Sydenham police station.

G. The continued renewal of Brockley Cross L~~l~~ocal C~~c~~entre will be supported in order to secure its long-term vitality and viability. Development proposals ~~will be expected to~~must contribute to the renewal and revitalisation of the ~~local~~ centre by:
   a. Reinforcing its distinctive character, particularly by maintaining a diverse mix of uses and responding positively to its historic character; ~~and~~
   b. Seeking opportunities to support and make provision of workspace for the cultural and creative industries, ~~reinforcing and enhancing~~ building on the existing cluster of activities to complement and strengthen relationships with the Forest Hill Cultural Quarter and Lewisham Creative Enterprise Zone~~.~~; and

~~b.~~c. Delivering public realm improvements at the western approach to Brockley station to improve access and sense of arrival.

H. Development proposals should help to secure the long-term vitality and viability of the Local Centres at Crofton Park, Ladywell, and Honor Oak/Brockley Rise ~~local centre~~ by:

a. Reinforcing ~~its~~ their distinctive and historic character, particularly by maintaining a diverse mix of main town centre uses and ~~responding positively to its historic character~~ improving shopfronts;

b. Delivering public realm enhancements to improve access and sense of arrival to and around train stations located in proximity to the centres; and

~~b.~~c. Seeking to alleviate vehicle congestion by improv~~e~~ing the walking and cycle environment.

~~I. Development proposals should help to secure the long-term vitality and viability of Crofton Park local centre by:~~

~~a. Reinforcing its distinctive character, particularly by maintaining a diverse mix of uses and responding positively to its historic character;~~

~~b. Seeking to improve the arrival point to Honor Oak around the station, particularly though public realm enhancements.~~

Commented [NE801]: Absorbed into H above.

LWA 3 Forest Hill D~~d~~istrict C~~c~~entre and surrounds

A. Development proposals ~~should contribute to securing~~ must support the long-term vitality and viability of Forest Hill D~~d~~istrict ~~town~~ C~~c~~entre by enhancing the townscape and other place qualities of the centre and its surrounds, as well as reinforcing its role as a key focal point for commercial, cultural and community activity. ~~Development proposals~~They must demonstrate how they will contribute to a coordinated process of town centre improvement that responds positively to the area's distinctive character. They ~~should~~ must also deliver a complementary mix of main town centre uses, ~~including~~ along with new housing, whilst ensuring that the centre's predominant commercial, cultural and community role is maintained and enhanced.

B. The growth and evolution of Forest Hill D~~d~~istrict C~~c~~entre and its surrounds as a key hub of creative, cultural and community activity will be supported and reinforced by:

~~a. Ensuring development proposals provide a complementary mix of uses within the town centre, in line with other Local Plan policies;~~

Commented [NE802]: Repetition – covered in LWA3.A above

~~b.~~a. Designating the Forest Hill Cultural Quarter along with promoting and seeking to protect cultural and creative uses and activities within it, in line with Policy EC18 (Culture and the night-time economy);

~~c.~~b. Designating the town centre as an area of local significance of night-time economic activity, and strengthening its role as a visitor destination, in line with Policy EC18 (Culture and the night time economy);

~~d.~~c. Promoting Havelock Walk as an important asset with the Cultural Quarter and ensuring development proposals within this location:

i. Respond positively to its distinctive character and employment function;

ii. Do not result in a net loss of workspace (including workspace associated with authorised live-work development); and

iii. Clearly demonstrate that proposals for live-work development will secure dedicated provision of workspace that is appropriate to the location;

~~e.~~d. Extending the boundary of the Malham Road ~~Locally Significant Industrial Site~~LSIS to include 118 Stansted Road, along with protecting and enhancing uses ~~that~~ within the LSIS that make a positive contribution to the Cultural Quarter; and

~~f.~~e. Promoting and protecting the Horniman Museum and Gardens as a significant cultural asset, ~~including by~~along with securing public realm enhancements that ~~improving~~ improve wayfinding and safe access to it.

C. Development proposals must contribute to enhancing the public realm in order to promote and enable walking and cycling within and around the centre, as well as to make ~~the town centre~~it a significantly more accessible, safer, healthier and attractive ~~environment~~place. Particular consideration will need to be given to movements along and across:

a. T~~t~~he main junction and ~~station approaches~~major roads, including the South Circular (A205), Dartmouth Road (A2216), Clyde Vale, Perry Vale and Waldram Park Road; and

~~g.~~b. Station approaches and forecourts.

~~C.~~D. Development proposals ~~will be supported where they contribute to enhancing east-west walking and cycle routes and connections within and around the town centre, including public realm enhancements along the station approaches and to the forecourt. Proposals~~ designed to improve the quality of the station underpass (including its visibility, legibility and safe use) will be strongly supported.

Commented [NE803]: Absorbed into C above

~~D.~~E. Development proposals ~~should~~ must respond positively to the evolving urban ~~scale and~~ character of the town centre and its immediate surrounds. ~~Development~~ They must ~~should~~ be designed to provide for an appropriate transition in scale, bulk, mass, ~~and~~ height and character between the commercial core of the centre, its edges and surrounding residential neighbourhoods, taking into account the area's distinctive townscape, landscape and topography features.

~~LWA4 West Lewisham Links~~

~~A. Development proposals will be expected facilitate the creation and enhancement of the West Lewisham Links, a connected network of high quality walking and cycle routes linking key routes, public open spaces and other key destinations across the West area.~~

~~B. On sites located adjacent to an existing or proposed route of the West Lewisham Links, or where an existing or proposed route runs through a site, development proposals must contribute to the delivery of a high quality public realm, giving priority to movement by walking and cycling, in line with Policy QD3 (Public realm) and TR3 (Healthy streets and part of healthy neighbourhoods). Proposals will be expected to deliver public realm improvements to support the delivery of the West Lewisham Links, the specific nature of which will be considered on a site by site basis, and may include contributions towards:~~

~~a. New or enhanced footpaths or cycleways;~~
~~b. Road realignment;~~
~~c. Street crossings or other safety measures;~~
~~d. Cycle parking;~~
~~e. External lighting;~~
~~f. Landscaping;~~
~~g. Tree planting or other green infrastructure;~~
~~h. Drinking water fountains;~~
~~i. Public conveniences;~~
~~j. Way-finding signage~~

~~C. To support the effective implementation of the West Lewisham Links, development proposals will be expected to have regard to the Council's Parks and Open Spaces Strategy.~~

Commented [NE804]: Absorbed into new borough-wide Lewisham Links policy c– see Part 2, Policy GR4. However, sub-area section supplemented with a new map of the links

Lewisham's West Area

18.9. Lewisham's West Area is characterised by the remnants of the Great North Wood along with its development as a series of ~~older~~ historic villages on a north-south spine which have grown around railway stations. The West Area will play a more complementary role in accommodating the Borough's future growth. This is owing to its expansive historic and natural environments along with the scarcity of large development sites. Together these factors limit opportunities for bringing forward substantial new development. The area's topography is another consideration. Its position at high ground, providing views towards London and Kent as well as to local landmarks, contributes to local character but also constrains certain types of development, such as tall buildings. Yet there remains a need to deliver new development in order to improve the liveability of the area's neighbourhoods as well as the viability of its centres and other employment locations. The Local Plan sets out a strategy to help facilitate new investment within the West Area, maximising opportunities that are available whilst ensuring growth is effectively coordinated, with a clear framework that responds to the area's valued built and natural assets, including its topography.

18.10. The West Area's network of town and local centres is one of its defining features. It also presents some of the main opportunities for accommodating growth. A key strategic priority is to secure the long-term viability and vitality of these centres by improving their place qualities, also responding to their position near stations and other transport routes. This can be achieved by facilitating new investment within the centres and enhancing connections between them. Public realm enhancements along the B218, Stanstead Road (South Circular) and other key routes, ~~transforming them into~~using the Healthy Streets Approach, is necessary to support safe and convenient movement by walking and cycling, and to help make travel by public transport more efficient. The sensitive intensification of these strategic movement corridors will therefore be supported as a means to secure new investment. It is imperative that the town centres retain their distinctive qualities and maintain a complementary offer of retail provision, services and community facilities. Most of the area's ~~strategic~~ main development opportunities are at site allocations ~~are~~ located within or around the centres, particularly the District Centres of Forest Hill and Sydenham as well as the L~~l~~ocal

Ccentres of Brockley and ~~Upper Sydenham /~~ Kirkdale. The redevelopment of these sites will help to ~~stimulate~~ generate new investment locally.

18.11. The continued evolution of Forest Hill District Centre into a thriving community, commercial and cultural hub is an important aspect of the spatial strategy for the Borough. The Local Plan seeks to build on the existing strengths of the centre as a key visitor destination. This includes taking advantage of its position as a gateway to the Horniman Museum and Gardens, and ensuring the centre is supported by a wide range of daytime and night time activities. Havelock Walk and 118 Stansted Road are unique commercial locations with a mix of cultural and creative industries. Their presence and value is recognised through the designation of the Forest Hill Cultural Quarter. Live-work accommodation has been successfully integrated at Havelock Walk, and is the only location in the Borough where this development typology is supported. Whilst the District Centre is well served by public transport its amenity is adversely impacted by the South Circular. We will therefore work with key stakeholders, including Transport for London and Network Rail, to secure the delivery of public realm enhancements wherever feasible. This may include, for instance, improvements to road crossings, and the station approach.

18.12. There are a number of designated and non-designated employment sites in close proximity to the town centres that make an important contribution to the local economy. The renewal of these sites will be encouraged in order to deliver new modern workspace and jobs, as well as to improve the relationship between commercial and other neighbouring uses. In selected Locally Significant Industrial Sites, the co-location of commercial and other complementary uses will be supported. This includes sites in Forest Hill as well as ~~Upper Sydenham /~~ Kirkdale, near Willow Way.

18.13. The West Area was once covered by the Great North Wood, which extended from New Cross to Croydon south of the Borough. Much of the woodland was lost by the 18h century, but a strong woodland character prevails with the abundance of large mature street and garden trees, nature reserves and green corridors along the railway ~~lines~~embankments and cuttings, and allotments and other green spaces. The ~~West~~ Lewisham Links are centred on the network of green infrastructure and other valued places, recognising the priority given to improving public access to them by walking and cycling.

Figure 18.1 West Area

Figure 18.2 West Area key diagram

Figure 18.3 West Area Lewisham Links

Figure 18.~~3~~4 Central Area site allocations

Site allocations

Note: For the text only version of the Local Plan: Main Issues and Preferred Approaches document, the West Area site allocations are included ~~in a separate~~at the end of this document.

Part Four:

Delivery and monitoring

19 Delivery and monitoring

DM1 Working with stakeholders to deliver the Local Plan

A. The Council will take a proactive and positive approach to working with and alongside stakeholders, including local communities and community groups, ~~key stakeholders,~~ landowners, development industry partners, public sector bodies and the wider public to ~~realise the Vision for Lewisham, and to~~ deliver the ~~strategic objective for 'An Open Lewisham as part of an Open London'~~Local Plan.

B. Progress towards the delivery of the ~~Vision for Lewisham and the Local Plan objectives, along with performance in implementation of the planning policies,~~ Local Plan will be regularly monitored and assessed, in line with Policy DM~~5~~7 (Monitoring and review). Where ~~necessary,~~ revisions to ~~strategic policy approaches~~planning policies ~~will be considered~~are necessary in order to ensure the successful implementation of the spatial strategy for the Borough, along with beneficial social, economic and environmental outcomes, these will be undertaken through the Local Plan review process.

~~B.~~C. The Council use powers available to it where this is necessary to support the delivery of the Local Plan, including planning enforcement.

Commented [NE805]: Respond to consultation – whilst enforcement is outside the scope of the Local Plan, a policy point is included in the delivery section to signpost the Council's intent to use powers available where appropriate

Explanation

~~19.1. The Lewisham Local Plan sets out an ambitious long-term strategy for securing and coordinating new investment in the Borough, along with managing growth and new development in a socially, economically and environmentally sustainable way. It seeks to provide clarity around the main issues and opportunities facing the Borough and certainty about how these will be addressed for the wider public benefit. The Local Plan sets out a Vision for Lewisham and, to support the delivery of this vision, provides details about the character sub-areas within the Borough and how development within their neighbourhoods can contribute to delivering inclusive, healthy and liveable places.~~

Commented [NE806]: Repetition – covered in Part 1

~~19.2.~~19.1. The Local Plan ~~is underpinned by a focus on delivery and implementation~~ sets out an ambitious strategy to secure new investment in the Borough and coordinate this to support Good Growth. It has been informed by an Infrastructure Delivery Plan (IDP). This provides a detailed assessment of the infrastructure required to support Lewisham's neighbourhoods and communities now and in the future, taking into account the levels of growth planned over the long-term. The Local Plan and its companion IDP ~~is a shared document~~are intended to be used both by ~~internal~~ the Council and its partners. ~~and external stakeholders alike, and has therefore~~ These documents have therefore been prepared through extensive public consultation and engagement. ~~It should help to ensure that~~ The Local Plan will help to ensure that infrastructure providers, ~~and~~ including public sector ~~agencies~~bodies, ~~are sighted on the scale of growth to be delivered locally~~understand Lewisham's future needs~~,~~ so that they can appropriately plan for and allocate funding towards ~~service and capacity upgrades~~these.

~~19.3.~~19.2. ~~We have prepared an Infrastructure Delivery Plan (IDP) as a companion document to the Local Plan, and which will support its successful implementation.~~

~~This sets out details on the infrastructure required to support growth and new development across the Borough.~~ The Council is legally required to review its Local Plan every five-years in order to ensure it is up-to-date. Authority Monitoring Reports are published annually and help to assess progress on the delivery of the Local Plan. The IDP will also be subject to regular review and updating over the plan period~~,~~. ~~for example to~~This will ensure it takes account of infrastructure that has been delivered and~~/or~~ new infrastructure programmes and service priorities that come to light. The Council will continue to liaise with infrastructure providers to inform updates to the IDP.

~~19.4.~~19.3. We will continue to work positively and proactively with key stakeholders including local communities and community groups, businesses,~~ key stakeholders~~, landowners, developers, public sector bodies and the wider public to ensure the successful delivery of the Local Plan. ~~Effective cross-service working, securing the coordinated and timely delivery of social and physical infrastructure improvements, including green infrastructure, will be essential to support new development and ensure that growth in Lewisham is delivered as Good Growth~~. The Statement of Community Involvement (SCI) sets out the Council's procedures for consulting the public on planning decisions. This includes the preparation of the Local Plan and guidance documents as well as the determination of planning applications. The SCI supports our wider corporate aims to increase public involvement in Council decisions, enhance transparency and openness in local democracy, and promote effective decision making. This includes implementation of the recommendations of the Lewisham Local Democracy Review.[160]

Commented [NE807]: Absorbed into paragraph above

Commented [NE808]: This is reflected in paragraphs above

Commented [NE809]: Respond to consultation – request for further information on how community groups can be involved in planning decisions

DM2 Infrastructure funding and planning obligations

Community infrastructure levy

A. The Council will set a Lewisham Community Infrastructure Levy which is payable on all qualifying development. CIL funding will be used to secure the delivery of inclusive, healthy and liveable neighbourhoods across the Borough that are well supported by infrastructure. A CIL Charging Schedule will be published and this will be subject to periodic review over the plan period.

B. A portion of Lewisham CIL collected will be allocated towards neighbourhood priorities to help ensure that local areas are appropriately supported with infrastructure and benefit from investment generated by new development. The Council will work proactively with local communities to set priorities for the spending of neighbourhood CIL in Lewisham.

C. Neighbourhood forums are strongly encouraged to identify priorities for the use of neighbourhood CIL in neighbourhood plans.

Planning obligations

[160] The 57 recommendations made by the Local Democracy Review were agreed by Mayor & Cabinet and Full Council in spring 2019. Full Council also approved the appointment of eight councillors to the renewed Local Democracy Working Group, which will oversee delivery of the recommendations.

D. The Council will seek planning obligations on a case-by-case basis having regard to the relevant policy requirements of the statutory Development Plan, development specific impacts, appropriate mitigation (including additional facilities or requirements made necessary by the development), viability and the statutory tests for the use of planning obligations. Where financial contributions are required these will be index linked, on an upward basis only, in order to maintain the value of the planning obligation.

Commented [NE810]: Amended for clarity in implementation and to bring in line with Planning Obligations SPD

E. The following is a list of areas where planning obligations may be sought, recognising that other types of obligations may be necessary depending on the nature of a proposal and individual site circumstances:

- Affordable housing
- Transport and highways infrastructure and works
- Sustainable transport and Healthy Streets
- Public transport improvements
- Parking controls and restrictions
- Community and social infrastructure
- Employment and skills training
- Affordable workspace
- Public realm
- Public art
- Community safety measures
- Amenity space
- Play space and recreational facilities
- Open space
- Green and blue infrastructure
- Biodiversity and wildlife habitats
- Communications infrastructure
- Management and maintenance arrangements
- Low carbon and renewable energy
- Flood risk management
- Utilities

Explanation

~~19.5.~~19.4. A wide range of strategic infrastructure projects will be required to support the levels of planned growth within Lewisham over the long-term. As well, specific measures may be needed on a site-by-site basis to ensure that additional needs for infrastructure generated by new development are positively managed and that any impacts arising are appropriately mitigated. The following section describes the main funding tools that are available to the Council to support the successful delivery of the Local Plan.

Community Infrastructure Levy

~~19.6.~~19.5. Both the Mayor of London and the Council have legal powers to introduce a Community Infrastructure Levy. This is a charge levied on certain types of new development and is non-negotiable. It is an important tool to help fund the delivery of strategic infrastructure that is essential to support growth across London, particularly transport infrastructure. CIL is also vital to helping the

Council secure infrastructure required for inclusive, healthy and liveable neighbourhoods across the Borough.

~~19.7.~~19.6. Most new development which creates net additional floor space of 100 square metres or more, or creates a new dwelling, is potentially liable for the levy. Some developments may be eligible for relief or exemption from the levy. This includes social housing, residential annexes and extensions, and houses and flats which are built by 'self-builders'. There are strict criteria that must be met, and procedures that must be followed, to obtain the relief or exemption. Applicants are advised to refer to the Government's Planning Practice Guidance for general information on the setting, collection and use of the levy.

~~19.8.~~19.7. The London Mayor has introduced a CIL that is applicable to qualifying development across London. The Council assists in administering the collection of CIL funding generated in Lewisham on behalf of the Mayor. We will seek to advise applicants on the latest information on the Mayoral CIL.

~~19.9.~~19.8. In addition, the Council adopted a CIL Charging Schedule in February 2015 which sets out the local levy rates within the Borough. This will be subject to periodic review and potential updating over the plan period. Changes to the CIL Charging Schedule may be necessary to respond to significant changes in the level of infrastructure provision required to support the planned levels of growth, or to take into account new evidence on development viability. Further information is available on the Council's planning website.

~~19.10.~~19.9. A portion of the local CIL collected in Lewisham is set aside to be spent on neighbourhood priorities. The Council has formally agreed governance arrangements for the use of this neighbourhood Community Infrastructure Levy (NCIL). There are NCIL funds available to each ward within the Borough. Local residents and community groups are encouraged to assist in setting priorities for the use of these funds within the local area. Neighbourhood forums are strongly encouraged to set out priorities for the use of NCIL within neighbourhood plans. This will allow for an additional level of public engagement in the process of priority setting and help to ensure there are clear priorities in place to address neighbourhood plan objectives. Further information on the governance arrangements for NCIL, and opportunities to assist in priority setting, is available on the Council's planning webpage.

Planning obligations

~~19.11.~~19.10. As part of the process of determining planning applications, the Council may seek to enter into legal agreements with landowners and developers, and/or secure planning contributions. This is particularly where infrastructure is required to address the additional demand generated by new development proposals. The purpose of planning obligations is to make development acceptable in planning terms. Planning obligations will be sought to compensate and/or mitigate the impact of a development, which without that mitigation, would render the development unacceptable in planning terms. Legal agreements and/or contributions will be negotiated on a case-by-case basis, taking into account the individual site circumstances and the mitigation measures required for the

development proposed. Planning applications will be refused where appropriate mitigation measures are not provided or cannot otherwise be secured.

~~19.12.~~19.11. We have published a Planning Obligations Supplementary Planning Document. This sets out guidance on the types and scale of planning obligations that are likely to be sought in accordance with Lewisham's statutory Development Plan. The SPD sets out our expectations on the process for securing planning obligations. Reduced contributions, where necessary (for example due to the exceptional costs of redeveloping a particular site) will be negotiated on an 'open book' basis based on the financial viability of the scheme. The Council will review and update its Planning Obligations SPD to ensure it appropriately aligns with the Development Plan.

19.12. The ~~draft~~ London Plan sets out that planning contributions towards affordable housing and transport infrastructure share the equal highest priority, and this will be a key consideration where there is a need to prioritise contributions owing to reasons of financial viability of a development.

19.13. Financial obligations will be index linked (on an upwards basis only) in order to maintain the value of the obligation, from the date of the resolution to grant planning permission until the date that the full payment is received. In most cases the Retail Price Index (RPI) will be used for non-capital financial contributions (e.g. workplace training contributions) and the Building Cost Information Service (BCIS) index, or equivalent agreed by the Council, will be used for financial contributions towards a specific building or facility as it relates more closely to the cost of delivering a scheme.

DM3 Masterplans and comprehensive development

A. Development proposals must be accompanied by a site masterplan where they form all or part of a site allocation, or in other circumstances specified by the Local Plan. The site masterplan will be expected to set out how development will contribute to delivery of the spatial strategy for the Borough. It must also suitably demonstrate that the proposal will not prejudice the future development of other parts of the site and adjoining land, or otherwise compromise the delivery of the site allocation and outcomes sought for the wider area.

B. The site masterplan must be submitted at the outline or full planning application stage. Where an outline application is submitted, it should be accompanied by a full planning application for the first phase of the development. The masterplan will be required to comprise of:
    a. An assessment of the site and its context to inform the overall development strategy;
    b. A detailed site-wide masterplan that responds positively to the spatial strategy for the Borough, site specific development principles and guidelines, and other relevant planning policies; and
    c. A delivery strategy that identifies how the development will be implemented and managed over its lifetime. This strategy must address any relevant matters to be resolved such as land assembly and preparation, infrastructure requirements, development phasing and likely need for planning obligations and/or planning conditions, where appropriate.

C. Proposals must address how the development site relates to neighbouring properties and the surrounding area, particularly in contributing to the delivery of the spatial strategy for the Borough. Where appropriate, applications will be required to be supported by a masterplan covering multiple sites in order to demonstrate the acceptability of the scheme both in terms of its immediate and wider context. This is additional to the site masterplan required by (A) and (B) above.

D. Applicants must demonstrate that they have appropriately consulted the public through the masterplan process, including active engagement with the landowners and occupiers of the subject site along with those in other parts of the allocated site.

Explanation

~~19.13.~~19.14. In order to achieve the Local Plan's vision and strategic objectives it will be important that all development proposals positively engage with and seek to deliver the spatial strategy for the Borough. This is particularly vital for those sites that have been allocated for their strategic role and potential to deliver new and improved housing, business space, public realm, facilities and other infrastructure to support our communities. The site allocations are comparatively large brownfield sites and can therefore add complexity in terms of their redevelopment. This may include a situation of multiple land ownership, fragmentation of existing uses and space, land remediation and need for new or upgraded infrastructure. The Council considers that these constraints are more likely to be overcome, and the optimal use of sites realised, where development is brought forward comprehensively and in line with a site-wide masterplan.

~~19.14.~~19.15. To help ensure certainty of outcomes, the Council will seek that masterplans are submitted at the outline or full planning application stage. The masterplan should be informed by a baseline assessment of the site and its surrounds, drawing on the latest available evidence. This may include demographic data, economic and social indicators and/or information on the historical, natural and built environment. The site-wide masterplan itself should establish the overall approach to the function and form of development. The level of detail included in the masterplan should be commensurate with nature and scale of development proposed, along with site specific requirements. Depending on individual circumstances, matters to be addressed may include: historical and cultural context; land uses, quantum and distribution of development; layout and design; access, circulation and parking; open space and landscaping; and infrastructure (including transport, community and green infrastructure).

~~19.15.~~19.16. The delivery strategy is important to ensuring certainty on outcomes sought both for the individual scheme and the site allocation. One of the key aims of the masterplan process is to ensure that landowners and/or developers are liaising with each other and made aware of the planning objectives for the site and wider area. Coordination between landowners and other stakeholders, including infrastructure providers, will help to ensure that proposals do not prejudice each other, or the wider development aspirations for the Borough. Sites that are designed and brought forward comprehensively through the master plan process will help to alleviate issues that may arise through piecemeal development, are more likely to maximise wider public benefits.

DM4 Land assembly

A. To ~~help realise the shared Vision for Lewisham and to achieve the strategic objective of "An Open Lewisham as Part of an Open London",~~enable the delivery of the Local Plan and the spatial strategy for the Borough the Council will support land assembly to achieve comprehensive development~~.~~ ~~and~~ The Council will use compulsory purchase powers, only where necessary, to assemble land for development within the Borough where:

   a. Landowners and/or developers, as appropriate, can demonstrate that:
      i. There is a viable and deliverable development proposal that appropriately satisfies the Local Plan requirements; and
      ii. They have made all reasonable efforts to acquire, or secure an option over, the land and/or building(s) needed, through negotiation.
   b. Comprehensive redevelopment of the assembled site is necessary to deliver a strategic site allocation contained in the Local Plan (including the requirements of a masterplan where required); and
   c. The development proposal for the assembled site will contribute to the delivery of the spatial strategy for the Borough, having particular regard to the Vision and place principle policies for the area within which the development is located.

B. Where compulsory purchase is necessary, and determined to be an appropriate option for securing development that supports the delivery of the spatial strategy, applicants will be required to demonstrate how the associated costs will impact upon development viability.

Explanation

~~19.16.~~19.17. A comprehensive approach to development of sites will often be in the public interest, particularly to secure the successful delivery of the spatial strategy for the Borough. On larger sites, including site allocations, the piecemeal development or incremental building out of schemes might be more easily delivered in certain circumstances. However the constraints posed by site boundaries, neighbouring developments or land uses, along with infrastructure and utilities (whether at or below the surface), all have potentially limiting consequences for the design, scale, land use mix and viability of schemes. Across Lewisham and particularly in key strategic locations - such as Opportunity Areas, Areas for Regeneration and town centres - such consequences could depress the optimal use of land or impose limitations on coordinated planning and development of a site or an area. A comprehensive approach to development is advocated in order to ensure the achievement of wider regeneration and strategic growth objectives.

~~19.17.~~19.18. The necessity to use compulsory purchase powers is more likely on complicated strategic sites, particularly where there are multiple landowners and leaseholders. The Council will always assess the most appropriate options for securing the successful delivery of the Local Plan. It will carefully consider the use of powers available to it in order to ensure new development is brought forward in a coordinated way, and delivered in the wider public interest.

~~EC 22~~ DM5 Meanwhile uses

A. Development p~~P~~roposals for the meanwhile (temporary) use of vacant ~~sites~~land or buildings ~~units in town centres and designated employment areas~~ will only be supported where the site or unit:

a. Is being actively marketed; or

b. Falls within the boundary of a site allocation that is not expected to come forward for comprehensive redevelopment in the short term; or

c. Is located on land within a consented major development scheme, which is being delivered in phases; and

d. The meanwhile use sought:

i. Is appropriate to its location, with priority given to suitable employment generating, community or cultural uses;

ii. Will not adversely impact on the amenity of adjoining and neighbouring occupiers, in line with the Agent of Change principle ~~(Policy QD 9)~~;

iii. Does not preclude the permanent use of the site for appropriate commercial or main town centre uses, or prohibit delivery of the site allocation; and

iv. Will be temporary in nature.

B. Development p~~P~~roposals for the meanwhile (temporary) use of vacant land and buildings ~~outside of~~within town centres and designated employment areas ~~will be considered on a case-by-case basis, having regard to their contribution to supporting the Borough's spatial strategy and compliance with other Local Plan policies~~ must not adversely impact on the viability of the town centre or function of the employment area in supporting commercial uses and activities.

Explanation

19.19. Vacant ~~premises~~buildings and sites can have a detrimental impact on the vitality and viability of ~~places~~commercial and other areas. This is especially in town centre locations where vacant units can visually detract from local character and result in lower levels of footfall. The Local Plan seeks ~~to~~ that the optimal~~ise the~~ use of land is made in the Borough including by ensuring that land and buildings do not go unnecessarily unused. ~~We will therefore give consideration to~~The meanwhile (temporary) use~~s~~ of vacant ~~units~~buildings (including building units) or sites, ~~particularly~~ where they ~~support~~provide for beneficial uses ~~that might not otherwise have site opportunities available~~. This includes uses that support business development, community and cultural activities (particularly in Cultural Quarters) and those that help to address acute ~~specialist,~~ local housing needs.

19.20. Where meanwhile uses are proposed, applicants must submit evidence to demonstrate that the vacant unit or site is being actively marketed, including during the period of meanwhile activity, at market rates that are reasonable to the local economic area. The intention here is to ensure that sites or units are taken up for their intended use whilst recognising some flexibility is needed to respond to fluctuations in the market or other factors. If we consider that a site or unit has

Commented [NE811]: Moved from Part 2 section on economy and culture - because these are temporary uses, the section fits better in this section. Also, meanwhile uses can also be non-employment uses (e.g. housing, Place/Ladywell).

been made deliberately vacant in order to secure a temporary consent, the application will be refused.

19.21. The Local Plan includes a number of strategic site allocations, some of which are expected to come forward over the medium to long-term. Our priority is to ensure that development is delivered as quickly as possible. However, there are circumstances where site allocations may take longer to be realised, such as when development is phased or time is needed to allow for coordination between different landowners. In the interim period we are keen to ensure that active uses are maintained wherever appropriate. ~~Place Ladywell is a successful example of a temporary use in the Lewisham town centre area, where an innovative modular mixed-use scheme was consented for a fixed period. This meanwhile use provided local provision of specialist accommodation and workspace, and has now been re-located to enable comprehensive redevelopment in line with the site allocation. The scheme has been recognised with several planning and design awards.~~

19.22. ~~All~~Development proposals for meanwhile uses must not preclude the future permanent occupation of the site or unit for an appropriate main town centre, commercial or other use, taking into account relevant site allocation policies. ~~Further, in line with other Local Plan policies, we will expect that~~ M~~m~~eanwhile uses ~~do~~must not have an adverse impact on the amenity of neighbouring properties or the local area. Where located in town centres or employment areas, meanwhile uses must not compromise the employment generating function of nearby sites in line with the Agent of Change principle, or otherwise harm the viability of the town centre.

19.23. ~~To encourage meanwhile uses, T~~the Council may consider the future use of Local Development Orders (LDO) allowing temporary uses in specific locations subject to certain conditions being satisfied.

19.24. Where meanwhile uses are approved they will be considered for monitoring purposes. This includes meanwhile residential uses, where conventional units and non-conventional bedrooms will be counted towards the Borough's housing target. This approach is consistent with that advocated in the ~~draft~~ London Plan.

DM6 Health Impact Assessments

Commented [NE812]: Respond to public consultation – request that health impact assessments are required for new developments

A. A desktop Health Impact Assessment (HIA) must be submitted with the following types of development proposals:
   a. Major developments;
   b. Developments located within an Air Quality Focus Area; and
   c. Developments including the following uses:
      i. Hot-food takeaways
      ii. Betting shops;
      iii. Education facilities;
      iv. Health and social care facilities;

v. Leisure and community facilities; and
vi. Publicly accessible open space.

B. Development proposals of a scale referable to the Greater London Authority must submit a detailed Health Impact Assessment.

Explanation

19.25. This policy supports the London Plan aims to create a healthy city by improving Londoners' health and reducing health inequalities. It also supports the objectives set out in Lewisham's Health and Wellbeing Strategy. HIAs will required for development proposals which are most likely to impact on public health outcomes whether by virtue of their large scale, nature of uses or location in an area of poor air quality.

19.26. The London Healthy Urban Development Unit (HUDU) provides guidance on completing HIAs, which applicants should refer. This uses a checklist approach that can normally be completed as a desktop study. The HIA should be undertaken as early as possible in the planning and design process in order to identify opportunities for maximising public health benefits, minimising harm and addressing health inequalities. Development proposals must demonstrate how the HIA has been used to inform the design. The HIA can be completed as a standalone assessment or form part of an Integrated Impact Assessment, where appropriate. The scope of the HIA will depend on the nature, scale and location of development along with the potential impacts on public health and wellbeing.

19.27. Development proposals of a scale referable to the Greater London Authority must complete and submit a more extensive and full HIA.

DM~~5~~7 Monitoring and review

A. The implementation of the Lewisham Local Plan will be kept under review throughout the plan period, taking into account the Local Performance Indicators set out in Table 19.1. Progress and performance outcomes towards the delivery of the Vision for Lewisham and the spatial strategy will be published annually in the statutory Authority Monitoring Report (AMR).

B. Development viability in the Lewisham will be regularly reviewed over the plan period. Where evidence suggests that changes in land values are likely to significantly impact on the viability of different types of development, whether in particular areas of across the Borough, the Council will consider the need for a review of strategic approaches or policies.

Explanation

~~19.18.~~19.28. Monitoring is necessary to assess progress towards the implementation of the Local Plan over the plan period. The section sets out the monitoring framework against which the successful delivery of the Local Plan will be measured. The monitors will help to assess yearly performance. However, it is recognised that that spatial strategy is underpinned by the need for sensitively

managed change and transformational investment (for example, in public transport infrastructure), which in some local areas or specific circumstances may take several years to begin to materialise.

~~19.19.~~19.29. Performance against Lewisham's Local Performance Indicators (LPIs) will be published in the statutory Authority Monitoring Report (AMR). Performance metrics and figures will be accompanied by commentary to make reports more legible and user-friendly, and may be supported by additional monitoring information. The LPIs will help to supplement, and should be read alongside, the Key Performance Indictors (KPIs) used for monitoring of the London Plan.

~~19.20.~~19.30. The LPIs are considered to be the key indicators for assessing policy performance and overall implementation of the Local Plan. The AMR will include a more comprehensive and detailed set of data, which will help to complement and put into context the LPIs. This may include data that is not made available on an annual basis, such as the Indices of Multiple Deprivation and Census data, information within research reports and other technical evidence, and Council strategies. The AMR is therefore expected to evolve over time, however continuity will be ensured through a focus on the LPIs.

~~19.21.~~19.31. Where monitoring clearly indicates that a strategic objective, elements of the Local Plan spatial ~~spatial~~ strategy or specific plan targets are not being delivered, we will assess the reasons for this and may consider, as appropriate, contingency measures or other actions. This may include single issue reviews and corresponding updates to the Local Plan.

~~19.22.~~19.32. We will regularly monitor development viability as part of the Local Plan monitoring. Where evidence suggests that changes in land values are likely to significantly impact on the viability of different types of development, whether in particular areas of across the Borough, the Council will consider the need for a review of strategic approaches or policies. This is particularly in respect of requirements for affordable housing. For example, where land values increase as a result of investment in strategic infrastructure (such as the Bakerloo line extension), we will seek to ensure that the maximum viable amount of genuinely affordable housing is secured on a site by site basis.

Table 19.1 Monitoring Framework

Ref	Measure	Indicator
Delivering an Open Lewisham		
LPI1	Open Lewisham	Positive reduction in multiple deprivation over the plan period, measured against the baseline 2019 Indices of Multiple Deprivation
LPI2	Departures from the Development Plan	Number of developments consented as advertised departures from Lewisham's Development Plan
LPI3	Planning appeals	Performance on planning appeals, reviewed annually
PLI4	Planning enforcement	Performance on planning enforcement, reviewed annually by number and type of planning enforcement cases registered, enforcement notices issued and appeals won.
High quality design and heritage		
LPI5	Design Review Panel	Number of development proposals considered by Lewisham Design Review Panel, measured annually.

PLI6	Density of housing	Density of consented housing developments consented and delivered, measured annually.
LPI7	Tall buildings	Number and location of tall buildings consented and delivered, measured annually.
LPI ~~1~~8	Historic environment	Adoption of Area Appraisals and Management Plans for all C~~c~~onservation A~~a~~reas
LPI9	Heritage at risk	Number of assets on the Heritage at Risk Register and assets removed from the Register through targeted action
LPI10	Listed buildings	Development approvals resulting in the loss of listed buildings
LPI11	Archaeology	Completion of review of Archaeological Priority Areas
Housing		
LPI ~~2~~12	Housing supply	Increase in supply in new homes over the plan period, measured by housing completions and net pipeline of approved housing units
LPI ~~3~~13	Housing delivery	Increase in supply in new homes, measured against housing completions towards the borough's strategic housing target to-date
LPI ~~4~~14	Small housing sites	Housing completions on small sites, measured against draft London Plan small sites target of 379 units annually, and as a proportion of overall housing completions
LPI ~~5~~15	Affordable housing	Positive trend in percentage of housing completions that are for affordable housing, on schemes of 10 units or more, measured against the borough's strategic affordable housing target of 50 percent
LPI ~~6~~16	Genuinely affordable housing delivery	Positive trend in percentage of housing completions that are for genuinely affordable housing
LPI ~~7~~16	Affordable housing planning contributions	Planning contributions secured towards affordable housing on schemes of less than 10 units, measured annually
LPI18	Housing size mix	Dwelling size mix (e.g. bedrooms) for consented and delivered development, measured annually.
LPI19	Purpose Built Student Accommodation	Number of PBSA developments and bed spaces consented and delivered, measured annually.
LPI20	Houses in Multiple Occupation	For HMOs requiring planning permission, location and number developments consented and delivered, measured annually.
LPI21	Gypsy and traveller accommodation	Delivery of 6 additional permanent gypsy and traveller pitches up to 2031.
Economy and culture		
LPI ~~8~~22	Industrial land availability	No overall loss of industrial floorspace in Strategic Industrial Locations and Locally Significant Industrial Sites
LPI ~~9~~23	Mixed-use employment locations	Industrial floorspace re-provided through comprehensive redevelopment of MEL sites, measured as the proportion of industrial floorspace of the overall floorspace delivered
LPI ~~10~~24	Non-designated employment sites	Industrial floorspace re-provided through the redevelopment of non-designated sites, measured as

		the proportion of industrial and other employment generating floorspace of the overall floorspace delivered
LPI ~~11~~25	New workspace	Positive trend in supply of towards a target of 21,800 net sqm ~~B1~~ light industrial floorspace by 2040
LPI ~~12~~26	Affordable workspace	Positive trend in affordable ~~B1~~ workspace as a share of total ~~B1~~ light industrial floorspace in planning approvals, along with planning contributions secured towards affordable workspace.
LPI27	Skills and training	Planning contributions and/or legal agreements secured for skills and training
LPI ~~13~~28	Retail floorspace	Increase in supply of retail floorspace, measured against the target of ~~5,300 net additional sqm over the ten year period 2020-2030 (comprising -500 sqm comparison and +5,800 sqm convenience goods)~~ an additional 8,397 gross square metres of floorspace up to 2035 (overall total comprises +10,641 square metres for convenience goods, -3,651 for comparison goods and +1,407 for food and beverage retail)
LPI ~~14~~29	Town centre vitality and viability	Reduction and stabilisation of town centre vacancy rates in major, ~~and~~ district and local town centres, towards a target of 5% vacancy rates for each centre
LPI ~~15~~30	Cultural infrastructure	No net loss of cultural venues and facilities
LPI ~~16~~31	Public houses	No net loss of public houses
Community infrastructure		
LPI ~~17~~32	Safeguarding c~~C~~ommunity infrastructure	No net loss of community infrastructure
LPI33	New community infrastructure	Development including provision of new community infrastructure consented and delivered, measured annually and by type of infrastructure
Green infrastructure		
LPI ~~18~~34	Open space	No net loss of designated open space
LPI35	Neighbourhood Open Space	Number of consented developments resulting in the net loss of Neighbourhood Open Space and amount of open space lost, measured annually
LPI36	Biodiversity	No net loss of designated biodiversity sites
LPI37	Biodiversity Net Gain	Biodiversity net gain measured over plan period
LPI38	Nature Recovery	Adoption and implementation of Local Nature Recovery Strategy
LPI39	Urban Greening	Percentage of qualifying major developments for which target Urban Greening Factor was met on-site
Sustainable design and infrastructure		
LPI ~~19~~40	Carbon neutral Lewisham	Reduction in borough-wide carbon emissions towards a local target of net zero carbon by 2030, contributing toward the London Mayor' strategic target for London to become a zero carbon by 2050
LPI ~~20~~41	Carbon emissions on new development	Average on-site carbon emission reductions of at least 35% compared to Building Regulations 2013 for approved major development applications.
LPI42	Carbon offsetting	Number of carbon offset payments and amount of funding secured through relevant legal agreements

LPI ~~21~~43	Air quality - major development	Positive trend in approved major development applications demonstrating that they meet at least air quality neutral standard for emissions
LPI44	Air quality – borough-wide	Achievement of air quality objectives for Nitrogen Oxide and Particulate Matter, in accordance with Lewisham Air Quality Management Plan
LPI45	Environmental incidents	Positive trend in reduction of environmental incidents reported to the Environment Agency[161]
LPI46	Net waste self sufficiency	100% of Borough's municipal waste managed within London by 2026
LPI47	Municipal waste recycling	Positive trend towards achievement of London Plan target for 65% municipal waste (household and business) recycled by 2030
LPI48	Construction and demolition waste and excavation.	Positive trend towards achievement of London Plan target for 95% of construction and demolition waste sent for re-use/ recycling/recovery by 2030, and 95% of excavation waste for beneficial re-use
LPI49	Composting	Positive trend towards achievement of London Plan target for zero biodegradable and recyclable waste to landfill by 2026.
Transport and connectivity		
LPI50	Strategic infrastructure	Progress in the delivery of strategic transport infrastructure, as measured by projects set out in Table 12.1 of the Local Plan
LPI ~~22~~51	Modal share	Increasing mode share for walking, cycling and public transport (excluding taxis) towards the London Mayor's target of ~~80~~90% in inner-London by 2041.
Neighbourhoods and places		
LPI ~~23~~52	Allocated sites committed	Number and proportion of total allocated sites committed by way of planning consent towards target of 100% by 2040
LPI ~~24~~53	Allocated sites delivered	Number and proportion of total allocated sites delivered by way of completion, towards target of 100% by 2040
LPI ~~25~~54	Housing supply by character area	Increase in supply in new homes in the character area over the plan period, measured by housing completions and net pipeline of approved housing units
LPI ~~26~~55	Housing delivery by character area	Increase in supply in new homes in the character area, measured against housing completions to-date
LPI ~~27~~56	Workspace delivery by character area	Positive trend in amount of workspace completed in the character area
LPI ~~28~~57	Retail floorspace delivery by character area	Net change in Class ~~A1~~ E retail floorspace by character area
LPI ~~29~~58	Lewisham links	Delivery of Lewisham links routes by character area
~~LPI 30~~	~~Open Lewisham~~	~~Positive reduction in multiple deprivation over the plan period, measured against the baseline 2019 Indices of Multiple Deprivation~~

Commented [NE813]: Moved to front end of table

[161] This refers to environmental incidents reported to the Environment Agency national incident hotline and may include, for example, water pollution, waste management issues, fish kills, odour issues, blocked drains, dust, misconnection issues, odour and low flow in rivers.

Part Five:

Appendices and schedules

20 Appendices

Appendix 1: Abbreviations

Table 20.1 Abbreviations	
ACV	Asset of Community Value
ALGG	All London Green Grid
APA	Archaeological Priority Area
ASLC	Area of special local character
AQA	Air Quality Assessment
AQFA	Air Quality Focus Area
AQMA	Air Quality Management Area
BLE	Bakerloo Line Extension
BREEAM	Building Research Establishment Environmental Assessment Method
CAZ	Central Activities Zone
CEZ	Creative Enterprise Zone
CHP	Combined heat and power
CIBSE	Chartered Institution of Building Services Engineers
CiGL	Greenspace Information for Greater London
CIL	Community Infrastructure Levy
CO2	Carbon dioxide
DLR	Docklands Light Railway
EA	Environment Agency
EqIA	Equalities Impact Assessment
GLAAS	Greater London Archaeological Advisory Service
GIA	Gross Internal Area
GLA	Greater London Authority
GLHER	Greater London Historic Environment Record
Ha	Hectare
HIA	Health Impact Assessment
HMO	House in Multiple Occupation
HRA	Habitats Regulations Assessment
HSE	Health and Safety Executive
IIA	Integrated Impact Assessment
IMD	Index of Multiple Deprivation
kWh	Kilowatt hour
LDD	London Development Database
LEL	Local Employment Location
LHN	Local Housing Need
LSIS	Locally Significant Industrial Sites
LVMF	London View Management Framework
MEL	Mixed Use Employment Location
MHGLC	Ministry of Housing Communities and Local Government
MMO	Marine Management Organisation

MOL	Metropolitan Open Land
NHS	National Health Service
NO2	Nitrogen dioxide
NOx	Oxides of nitrogen, or nitrogen oxides: a mixture of nitric oxide and nitrogen dioxide
NPPG	National Planning Practice Guidance
NPPF	National Planning Policy Framework
OA	Opportunity Area
PBSA	Purpose-Built Student Accommodation
POS	Public Open Space
PSA	Primary Shopping Area
PTAL	Public Transport Access Level
RIGS	Regionally-Important Geological Sites
SAC	Special Areas of Conservation
SEA	Strategic Environmental Assessment
SELCHP	The South East London Combined Heat and Power Plant
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SIL	Strategic Industrial Location
SINC	Site of Importance for Nature Conservation
SFRA	Strategic Flood Risk Assessment
SMEs	Small and medium-sized enterprises (including micro-businesses)
SPA	Special Protection Areas
SPG	Supplementary Planning Guidance
Sqm	Square metres
SUDs	Sustainable Urban Drainage Systems
TE2100	Thames Estuary 2100 Plan
TER	Target Emission Rate
TfL	Transport for London
UGS	Urban Green Space
UGF	Urban Greening Factor
VBC	Vacant Building Credit
WHS	World Heritage Sites
WFD	European Wwater Framework Directive (WFD)

Appendix 2: Glossary

A

Active fFrontage Design principle in which the tThe front of a buildings with openings onto the space that is designed to generate visual interest, activity and engagement between the building interior and the space outside of it, particularly entrances at the ground floor or street level. An active frontage normally forms part of a positive frontage of a building located within a town centre. See also Positive frontage.

Affordable housing See National Planning Policy Framework and London Plan policy H4. also 'genuinely affordable housing', as well as Local Plan Policy HO3 and draft London Plan Policy H4). See also Genuinely affordable housing.

Affordable wWorkspace Workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose.

Agent of Change Principle The A principle that places the responsibility of mitigating the impact of nuisances (including noise) from existing noise nuisance generating businesses uses on the proposed new development, close by, thereby ensuring that residents and users of the new development are protected from noise nuisances, and existing businesses uses are protected from noise nuisance complaints. Similarly, any new noise nuisance-generating development, for example a music venue, will need to put in place measures to mitigate noise impacts on existing development close by. See London Plan Policy D13.

Air Quality Management Area (AQMA) Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines. An area which a local authority had designated for action, based upon a prediction that air quality objectives will be exceeded.

Albedo The surface reflectivity of the sun's radiation.

Ambient Noise Ongoing sound in the environment such as from transport and industry, as distinct from individual events, such as a noisy all-night party. Unless stated otherwise, noise includes vibration.

Air quality neutral An air quality neutral development is one that meets, or improves upon, the air quality neutral benchmarks published in guidance from the Greater London Authority.

Amenity Element of a location or neighbourhood that helps to make it attractive or enjoyable for residents and visitors.

Amenity sSpace The outside space of a building normally associated with a home or homeshousing. It may be private or shared, depending on the building it serves.

Ancient or vVeteran tTree A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

Ancient wWoodland An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS).

Archaeological iInterest There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence

about the substance and evolution of places, and of the people and cultures that made them.

Areas of dDeficiency in aAccess to nNature Areas where people have to walk more than one kilometre to reach a publicly accessible Metropolitan or Borough Site of Importance for Nature (SINC).

Areas of dDeficiency in aAccess to pPublic oOpen sSpace Areas lacking in sufficient publicly accessible open space, as defined by a set of standards in Policy G4 of the London Plan.

Article 4 Direction A tool used by local planning authorities to remove some or all permitted development rights that apply to a particular site or area.

B

Back gGardens Private amenity areas that were the entire back garden of a dwelling or dwellings as originally designed.

Backland sSites Landlocked site to the rear of street frontages not historically in garden use such as builders yards, small workshops and warehouses, and garages.

Biodiversity This refers to the variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society.

Biodiversity oOffsets Measures to improve existing or create replacement habitat where there are unavoidable impacts on wildlife habitats resulting from development or change of land use.

Biomass The total dry organic matter or stored energy of plant matter. As a fuel it includes energy crops and sewage as well as arboricultural forestry and agricultural residues.

Brown fField Land Previously developed land.

Build to Rent Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control. See London Plan policy H11.

Building Research Establishment Environmental Assessment Method (BREEAM) A national environmental assessment and rating system for buildings. It is the most widely used environmental standard in the UK, used to assess those buildings and extensions to buildings that are not rated by the Code for Sustainable Homes.

C

Carbon dDioxide (Co2) Principal greenhouse gas related to climate change.

Car cClub A short-term car vehicle rental service that allows members access to cars parked locally for a per-minute, per-hour or per-day fee.

Car fFree dDevelopment Car- free developments do not provide parking for cars on-site and there is no entitlement to on-street parking permits for residents. The exception to this is

~~parking for accessible properties.~~ has no general parking but should still provide disabled persons parking. See London Plan policy T6.

~~**Carbon Dioxide (Co2)** Principal greenhouse gas related to climate change.~~

~~**Care Home** Housing generally catering for older people, those less mobile or wheelchair users. Schemes may have their own care staff, and will usually provide one or more meals each day, if required. Bathrooms will be designed to make it easier for assistance to be offered.~~

Central Activities Zone (CAZ) The vibrant heart and globally iconic core of London. The CAZ contains a broad range of functions that have London-wide, national and international significance~~, including Government, business, culture, research and education, retailing, tourism, transport and places of worship. The CAZ offers access to a unique collection of heritage and environmental assets including World Heritage Sites, the Royal Parks and the River Thames~~

Circular economy An economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'.

~~**Climate Change Adaptation** Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.~~

~~**Climate Change Mitigation** Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.~~

Combined Heat and Power (CHP) The combined production of electricity and usable heat is known as Combined Heat and Power ~~(CHP)~~. Steam or hot water, which would otherwise be rejected when electricity alone is produced, is used for space or process heating.

Commercial w~~W~~aste Waste arising from premises which are used wholly or mainly for trade, business, sport, recreation or entertainment as defined in Schedule 4 of the Controlled Waste Regulations 1992.

Communal h~~H~~eating s~~S~~ystem A communal heating system supplies heat to multiple properties from a common heat source. It may range from a district system heating many buildings to a system serving an individual block of flats.

~~**Community Facilities** For the purposes of this Local Plan, community facilities can include: public houses, libraries, youth facilities, meeting places, places of worship, public conveniences and other uses in use class D1 that provide a service to the local community.~~

Community infrastructure See Social infrastructure.

Community Infrastructure Levy (CIL) A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area to pay for infrastructure projects identified by the Local Authority and/or the Mayor of London.

~~**Comparison retail/shopping** These refer to shopping for things like clothes, electrical items, household and leisure goods. Comparison goods are bought relatively infrequently, so consumers usually evaluate prices, features and quality before making a purchase.~~

~~**Connectivity** This refers to the number of connections and their integration, layout and relationship to one another and the impact this has on getting from A to B, by foot, bicycle and vehicle.~~

Conservation (h~~H~~eritage) The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance

Conservation Area Areas of special architectural or historic interest designated by local authorities under the Planning (Listed Building and Conservation Areas) Act 1990.

~~**Contributions** Land, services, facilities and/or money given by developers of land to the local authority following negotiations, to ensure that the needs of new communities generated by the development are catered for.~~

~~**Convenience retail/shopping** These refer to shopping for everyday essential items like food, drink, newspapers and confectionery.~~

~~**Core Strategy** A Local Plan setting out the spatial vision and strategic objectives of the planning framework for the area, in line with the Sustainable Community Strategy.~~

Creative Enterprise Zone (CEZ) A Mayor of London initiative to establish clusters of creative production, which provide affordable premises and enterprise-related incentives for artists and creative businesses, pro-culture planning and housing policies, and offer career pathways and creative jobs for local communities and young people.

Creative i~~I~~ndustries Those industries which have their origin in individual creativity, skill and talent which have a potential for wealth and job creation through the generation and exploitation of intellectual property.

Cultural Quarters Areas where a critical mass of cultural activities and related uses, usually in historic or interesting environments, are designated as Cultural Quarters. ~~They can contribute to urban regeneration~~

D

Decentralised e~~E~~nergy Local renewable and local low-carbon energy sources.

~~**Deliverable** "To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:~~

> ~~a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).~~
>
> ~~b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."~~

Design and Access statement A statement that accompanies a planning application to explain the design principles and concepts that have informed the development and how access issues have been dealt with. ~~The access element of the statement should demonstrate how the principles of inclusive design, including the specific needs of disabled~~

~~people, have been integrated into the proposed development and how inclusion will be maintained and managed.~~

~~**Design Concept** The basic design ideas on which a proposal will be based, often expressed in a combination of words and visual material.~~

Designated hH eritage aA sset World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

~~**Developable** To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.~~

~~**Development Management** These policies set out detailed criteria to carefully manage and control development through the planning application process.~~

Development Plan For Lewisham this comprises The London Plan, Lewisham Local Plan~~s, other Development Plan Documents~~ and Neighbourhood Plans.

~~**Development Proposal** This refers to development that requires planning permission.~~

Digital iI nfrastructure Infrastructure, such as small cell antenna and ducts for cables, that supports fixed and mobile connectivity and therefore underpins smart technologies.

District Centre ~~Distributed more widely than Metropolitan and Major centres, providing convenience goods and services, and social infrastructure for more local communities and accessible by public transport, walking and cycling. Typically, they contain 5,000- 50,000 sqm of retail, leisure and service floor space. Some District centres have developed specialist shopping function.~~ See London Plan, Annex 1.

District hH eating nN etwork A network of pipes carrying hot water or steam, usually underground that connects heat production equipment with heat customers. They can range from several metres to several kilometres in length.

~~**Drainage Hierarchy** Policy hierarchy helping to reduce the rate and volume of surface water run-off.~~

Dual aA spect dD welling A dual aspect dwelling is defined as one with openable windows on two external walls, which may be either on opposite sides of a dwelling or on adjacent sides of a dwelling where the external walls of a dwelling wrap around the corner of a building. The provision of a bay window does not constitute dual aspect.

Dwelling A self-contained unit of residential accommodation; also referred to as a 'residential unit'.

E

~~**Edge of Centre** For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.~~

Embodied carbon / energy / emissions The total life cycle carbon, energy, greenhouse gases used in the collection, manufacture, transportation, assembly, recycling and disposal of a given material or product.

Energy eEfficiency Making the best or most efficient use of energy in order to achieve a given output of goods or services, and of comfort and convenience

Energy Hierarchy The Mayor's Ttiered approach to reducing carbon dioxide emissions in the built environment. See London Plan policy SI 2. The first step is to reduce energy demand (be lean), the second step is to supply energy efficiently (be clean) and the third step is using renewable energy (be green).

Environmental Impact Assessment A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment.

Evidence Base The data and information about the current state of Lewisham used to inform the preparation of Local Plan documents.

F

Family housing A dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally has three, four, five, or more bedrooms. Also referred to as family-sized housing or homes.

Flood Risk Assessment (FRA) An assessment of the likelihood of flooding in a particular area (usually a specific site) so that development needs and mitigation measures can be carefully considered.

Freight A general term to refer to trips made for the purposes of delivering goods, enabling servicing activity or supporting construction.

Future Proofing Ensuring that designs are adaptable and take account of expected future changes. For example, ensuring a heating system is designed to be compatible with a planned district heat network to allow connection in future.

G

Genuinely aAffordable aHousing In Lewisham, genuinely affordable housing is housing at social rent levels or the GLA London Affordable Rent level (in Lewisham this is GLA London Affordable Rent minus the 1 per cent above Consumer Price Index uplift).

Geodiversity The range of rocks, minerals, fossils, soils and landforms.

Good Growth This is growth that is socially and economically inclusive and environmentally sustainable. See also London Plan, Chapter 1.

Green Belt A designated area of open land around London (or other urban areas). The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Green cCorridor Relatively continuous areas of open space leading through the built environment, which may be linked and may not be publicly accessible to each other and to the Green Belt or Metropolitan Open Land. They often consist of rivers, railway embankments and cuttings, roadside verges, canals, parks, playing fields and extensive areas of private gardens. They may allow animals and plants to be found further into the

built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.

Green cCover The total area covered by vegetation and water across London. It not only includes publicly accessible and publicly managed vegetated land (i.e. green space) and waterways, but also non-accessible green and blue spaces, as well as privately owned vegetated land including private gardens and agricultural land, and the area of vegetated cover on buildings and in the wider built environment such as green roofs, street trees and rain gardens

Green industries Business sector that produces goods or services which, compared to other more commonly used goods and services, are less harmful to the environment.

Green iInfrastructure A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Green rRoofs and wWalls ~~The total area covered by vegetation and water across London. It not only includes publicly accessible and publicly managed vegetated land (i.e. green space) and waterways, but also non-accessible green and blue spaces, as well as privately owned vegetated land including private gardens and agricultural land, and the area of vegetated cover on buildings and in the wider built environment such as green roofs, street trees and rain gardens~~ Planting on roofs or walls to provide climate change, amenity, food growing and recreational benefits.

Green sSpace All vegetated open space of public value (whether publicly or privately owned), including parks, woodlands, nature reserves, gardens and sports fields, which offer opportunities for sport and recreation, wildlife conservation and other benefits such as storing flood water, and can provide an important visual amenity in the urban landscape

Greenfield runoff rate The runoff rate from a site in its natural state, prior to any development.

Greenhouse gGas Any gas that induces the greenhouse effect, trapping heat within the atmosphere that would normally be lost to space, resulting in an increase in average atmospheric temperatures, contributing to climate change. Examples include carbon dioxide, methane and nitrous oxides.

Greening The improvement of the appearance, function and wildlife value of the urban environment through soft landscaping use of vegetation or water.

Gypsy and Traveller Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

H

Habitable rRoom A habitable room is any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bath or toilet facilities, corridors, hallways, utility rooms or similar should not be considered habitable rooms.

Health Impact Assessment (HIA) Used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population and highlight any health inequalities that may arise. ~~HIA should be undertaken as~~

~~early as possible in the plan making or design process to identify opportunities for maximising potential health gains, minimising harm, and addressing health inequalities.~~

~~**Heat Map** Is a graphical representation of data where elements are represented as colours. In this particular instance as the colour darkens the height increases.~~

Heritage aA~~A~~sset A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

Historic eE~~e~~nvironment All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Historic Environment Record Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.

House ~~of~~ in Multiple Occupation (HMO) Dwellings which are shared by three or more tenants who form two or more households and share a kitchen, bathroom or toilet. HMOs for between three and six people are classed as C4 (except for areas affected by an Article 4 Direction) whereas HMOs for more than six people are Sui Generis.

Household wW~~w~~aste Household waste includes waste from collection rounds of domestic properties (including separate rounds for the collection of recyclables), street cleansing and litter collection, beach cleansing, bulky household waste collections, hazardous household waste collections, household clinical waste collections, garden waste collections, and any other household waste collected by the waste authorities.

~~**Housing Need** A level of socially desirable housing, the demand for which is not reflected in the open market, normally due to a lack of income in relation to prevailing house prices or rents. It can therefore usually only be met through an element of subsidy.~~

I

~~**Independent Examination** The process by which a planning inspector may publicly examine a Local Plan before issuing a report with recommendations that should be made prior to adoption of the Local Plan.~~

Inclusive design Inclusive design results in an environment which everyone can use, to access and benefit from the full range of opportunities available; confidently, independently, with choice and dignity, which avoids separation or segregation and is made up of places and spaces that acknowledge diversity and difference, meeting the needs of everyone in society.

Infill Development Development that takes place on vacant or undeveloped sites between other developments and/or built form.

Infrastructure ~~Includes transport, energy, water, waste, digital/smart, social and green infrastructure.~~ Term used to describe the facilities and services for local people to live their everyday lives. Infrastructure can take many forms; it can be defined in physical, green and social terms, and can range from strategic provision, such as a new road or school, to the creation of a local play-space.

Inner London The area covered by the inner London boroughs.

Integrated Impact Assessment (IIA) As part of developing Tower Hamlet's Local Plan all policies have been subject to an IIA. The IIA comprises: Sustainability Appraisal, Health Impact Assessment, Equalities Impact Assessment and Habitat Regulation Assessment.

Intermediate

Intermediate Housing Homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the affordable housing definition. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent See National Planning Policy Framework and London Plan policy H6.

L

Land Contamination (Assessment) A study of the level of contamination of the land on a development site, including, as appropriate, initial risk assessment, site investigation, remediation strategy and a verification plan and report.

Legibility The extent to which a place can be easily understood and traversed.

Lewisham Transport Interchange This includes the mainline railway station, the DLR station and the bus layover site that covers the area sandwiched between both station buildings and the large roundabout that links the A20 and the A21.

Listed Building Buildings of special architectural or historic interest designated by the Department of Culture, Media and Sport under the Planning (Listed Building and Conservation Areas) Act 1990.

Liveable nNeighbourhoods Is a programme gives boroughs the opportunity to bid for funding for long-term schemes that encourage walking, cycling and the use of public transport. A neighbourhood that supports living, working, commerce and culture within its area, along with encouraging and enabling sustainable modes of travel, particularly walking and cycling. It also refers to the suitability and desirability of an environment for people of all backgrounds, ages and abilities.

Local Centre Typically serve a localised catchment often most accessible by walking and cycling and include local parades and small clusters of shops, as well as hosting a key community facility as an 'anchor' attracting visitors. They may include a small supermarket (typically up to around 500 sqm), sub post office, pharmacy, laundrette and other useful local services. See London Plan, Annex 1.

Local Development Framework (LDF) The Local Development Framework is a portfolio, or a 'folder', of Local Development Documents which will provide the local planning authority's policies for meeting the community's economic, environmental and social aims for the future of their area where this affects the development and use of land.

Local Development Order An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development.

Local Housing Need The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework).

Local Plan A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

Local vViews A local line of sight from a particular point to an important local landmark, view or skyline.

Locally Listed bBuildings These are buildings of historic or architectural interest at the local level. Although they are not legally protected, in general, close scrutiny will be given to any development affecting them.

London Panorama A broad prospect seen from an elevated public viewing place.

London Plan The London Plan is the spatial development strategy for all of London. It is prepared by the Mayor of London / Greater London Authority. In London, Local Plans must be in general conformity with the London Plan.

Low Emission Zone Charging zone across most of Greater London for vehicles (excluding cars) that do not meet emissions standards

M

Main Town Centre Uses Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). See also National Planning Policy Framework.

Major Centre Typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 sqm of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions. See London Plan, Annex 1.

Major Development For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floor space of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Masterplan "A document which sets out land use principles and/or proposals for the layout and design of buildings, spaces, transport and movement of people and vehicles, strategy and land use in text and three dimensions and and supporting infrastructure along with matches these proposals to a delivery strategy. A masterplan can cover an individual site, multiple sites and/or a wider strategic area, such as a town centre. The masterplan can be described as a sophisticated 'model' that:

- shows how the streets, squares and open spaces of a neighbourhood are to be connected
- defines the heights, massing and bulk of buildings
- sets out suggested relationships between buildings and public spaces
- determines the distribution of activities and uses that will be allowed

~~•identifies the network of movement patterns for people moving by foot, cycle, car or public transport, service and refuse vehicles~~

~~•sets out the basis for provision of other infrastructure elements such as utilities~~

~~•relates physical form to the socio-economic and cultural context and stakeholder interests~~

~~•allows an understanding of how well a new, urban neighbourhood is integrated with the surrounding urban context and natural environment."~~

Metropolitan Open Land Extensive areas of land bounded by urban development around London that fulfils a similar function to Green Belt and is protected from inappropriate development by land-use planning policies.

Metropolitan Town Centre ~~Serve wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically they contain at least 100,000 sqm of retail, leisure and service floorspace with a significant proportion of high order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings~~ See London Plan, Annex 1.

Mixed use Employment Location (MEL) ~~Land currently in industrial use occupied by older and poorer quality industrial uses at low densities which may be incompatible with adjacent residential areas. The sites were considered by the Lewisham Employment Land Study to require redevelopment and have been designated to ensure mixed use development incorporating reprovision of business space to ensure the regeneration of a part of the borough where the environment is poor and levels of deprivation are high.~~ Designated land within Lewisham's employment land hierarchy. MELs consist of large redundant and/or underused industrial sites where plan-led, mixed-use redevelopment is permitted to support strategic regeneration objectives. Some MEL sites have now been comprehensively redeveloped.

Mixed-use d~~D~~evelopment Development for a variety of activities on single sites or across wider areas such as town centres.

N

~~National Planning Policy Framework (NPPF)~~ ~~Prepared by the Government to explain statutory provisions and provide guidance to local authorities and others on planning policy and the operation of the planning system. The NPPF explains the relationship between planning policies and other policies which have an important bearing on issues of development and land use. Local authorities must take their contents into account in preparing plans. The guidance may also be relevant to decisions on individual planning applications and appeals.~~

Natural s~~S~~urveillance When buildings around a space are designed with features that are likely to lead to people overlooking the space. These may be windows, balconies, front gardens or entrances.

Nature c~~C~~onservation Protection, management and promotion for the benefit of wild species and habitats, as well as the human communities that use and enjoy them. This also covers the creation and re-creation of wildlife habitats and the techniques that protect genetic diversity and can be used to include geological conservation.

Neighbourhood Plan A statutory plan prepared by a ~~parish council or~~ designated neighbourhood forum that contains non-strategic planning policies for a designated

neighbourhood area. ~~In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.~~

Noise and vVibration aAssessment An assessment of noise and vibration that is either; existing and may impact upon future development, or that would be caused by new development and could impact upon the existing environment.

~~**Non-strategic Policies** Policies contained in a neighbourhood plan, or those policies in a local plan that are not strategic policies.~~

North fFacing North facing windows are generally defined as any windows within 45 degrees of due north.

O

Older pPeople People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs

Open sSpace ~~All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.~~ Land that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within Lewisham, both designated and non-designated, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

Opportunity Area London's principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility.

Original Building A building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.

~~**Out of Town/ Out of Centre** A location out of centre that is outside the existing urban area.~~

~~**Outer Centre** A location which is not in or on the edge of a centre but not necessarily outside the urban area.~~

~~**Outer London** The area covered by the outer London boroughs.~~

Outstanding Universal Value Cultural and/or natural significance that is so exceptional that it transcends national boundaries and is of common importance for both present and future generations. An individual Statement of Outstanding Universal Value is agreed and adopted by the UNESCO World Heritage Committee for each World Heritage Site at the time of its inscription. This Value can be expressed by physical, architectural or intangible attributes that are ~~To~~ embodied in the buildings, spaces, monuments, artefacts and archaeological deposits within the site, the setting and views of and from it. ~~Statements of Outstanding Universal Value are key references for the effective protection and management of World Heritage Sites and can be found at http://whc.unesco.org/en/list.~~

P

People with dDisabilities People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.

~~**Permission in Principle** Form of planning consent which establishes that a site is suitable for a specified amount of housing-led development in principle. Following a grant of permission in principle, the site must receive a grant of technical details consent before development can proceed.~~

Permeability The extent to which an area has a variety of pleasant, convenient and safe routes through it by walking and cycling.

Permitted Development Rights A general planning permission granted not by the local authority but by Parliament. Legislation (currently the Town and Country Planning (General Permitted Development (England) Order 2015) sets out classes of development for which a grant of planning permission is automatically given, provided that no restrictive condition is attached or that the development is exempt from the permitted development rights.

~~**Planning and Compulsory Purchase Act 2004** National planning legislation from central government aimed at improving the planning process and enhancing community involvement in it.~~

Planning condition A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

~~**Planning Frameworks** These frameworks provide a sustainable development programme for Opportunity Areas. The frameworks may be prepared by the GLA Group, boroughs, developers or partners. While planning frameworks will have a non-statutory status, it will be up to boroughs to decide how to reflect the proposals in planning frameworks within their Development Plans~~

Planning oObligation A legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal. See also Section 106 agreements.

Playing fField The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Policies Map A part of the Local Plan illustrating the policies and showing the location of proposals on an Ordnance Survey base map.

Positive frontage Design principle in which the front of the building is designed to create or enhance visual interest, provide a clear and legible articulation of buildings and their facades, and add vitality to the street or public realm. A positive frontage may incorporate an active frontage at the ground floor or street level. See also Active frontage.

Previously Developed Land Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for

restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

Primary Shopping Area **(PSA)** Defined area where retail development is concentrated.

Priority **h**~~**H**~~**abitats** ~~**and Species** Species and~~ Habitats of p~~P~~rincipal i~~I~~mportance ~~included in the England Biodiversity List published by the Secretary of State~~identified under section 41 of the Natural Environment and Rural Communities Act 2006. Most areas of priority habitat are protected within Sites of importance for Nature Conservation

Priority species Species that are a conservation priority because they are under particular threat, or they are characteristic of a particular region.

Private **r**~~**R**~~**ented** **s**~~**S**~~**ector** All non-owner-occupied self-contained dwellings that are being rented out as housing (not including forms of affordable housing).

Protected species Certain plant and animal species protected to various degrees in law, particularly the Wildlife and Countryside Act, 1981 (as amended).

Public realm The publicly accessible space between and around buildings, including streets, squares, forecourts, parks and open spaces

Public Transport Access Level~~**s**~~ **(PTAL**~~**s**~~**)** The extent and ease of access by public transport, or, where it can reasonably be used as a proxy, the degree of access to the public transport network. ~~Public Transport Access Levels (~~PTALs~~)~~ are calculated across London using a grid of points at 100m intervals. For each point walk time to the public transport network is combined with service wait time (frequency) to give a measure of public transport network density.

Q

Quiet Areas The Environmental Noise (England) Regulations 2006 (as amended) require that Noise Action Plans for agglomerations (including much of Greater London) include provisions that aim to protect any formally identified 'Quiet Areas' from an increase in road, railway, aircraft and industrial noise.

R

Recycling Involves the reprocessing of waste, either into the same product or a different one. Many non-hazardous wastes such as paper, glass, cardboard, plastics and metals can be recycled. Hazardous wastes such as solvents can also be recycled by specialist companies, or by in-house equipment.

Renewable Energy Energy derived from a source that is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material, but not fossil fuels or nuclear energy. Although not strictly renewable, geothermal energy is generally included.

Retrofitting The addition of new technology or features to existing buildings in order to make them more efficient and to reduce their environmental impacts.

Riverside The bank or area alongside a river.

S

Safeguarded Wharves A network of sites that have been safeguarded for cargo handling uses such as intraport or transhipment movements and freight-related purposes by Safeguarding Directions. ~~Sites that are safeguarded are set out in the Safeguarded Wharves Review (2017/2018).~~

Secondary hHeat To recover useful energy, in the form of heat, from sources where processes or activities produce heat which is normally wasted (for example recovering heat from the Underground network) or from heat that exists naturally within the environment (air, ground and water).

Section 106 agreements These agreements confer planning obligations on persons with an interest in land in order to achieve the implementation of relevant planning policies as authorised by Section 106 of the Town and Country Planning Act 1990. See also Planning obligation.

Self-build and cCustom-build hHousing Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

Sequential aApproach ~~Planning policies that require particular steps to be taken, or types of location or sites to be considered, in a particular order of preference. For example retail, commercial and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are or can be well integrated with the existing centre and public transport~~ As defined in the National Planning Policy Framework, paragraph 86 in relation to planning applications for town centre uses and paragraph 158 in relation to flood risk.

Serviced aAccommodation In the context of visitor accommodation this includes hotels, bed & breakfasts, guest houses, and hostels where services such as catering and cleaning are provided to guests.

Setting of a hHeritage aAsset The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Shell and cCore A commercial development where all internal finishes and services are left out, for provision by the tenant.

Significance ~~(for~~ of a heritage asset ~~policy)~~ ~~Is the surrounding in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.~~ The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

Single fFamily hHouse Self-contained house occupied by a single family. Also referred to as single family home.

Site aAllocation A type of Local Plan policy which ~~These~~ establishes land-use principles and~~, where appropriate, site specific~~ requirements for new development within a specific location. ~~The designations and site allocations will help to ensure that development within Lewisham is appropriately managed and does not compromise the achievement of the plan's vision and strategic objectives~~

Site of Importance for Nature Conservation (SINC) Areas of land chosen to represent the best wildlife habitats in London and areas of land where people can experience nature close to where they live and work. Sites are classified into Sites of Metropolitan, Borough and Local Importance depending on their relative value. Unlike SSSIs, SINCs are not legally protected, but their value must be considered in any land use planning decision. Procedures for the identification of SINCs are set out in Appendix 5 of the Mayor's London Environment Strategy.

Social infrastructure Covers facilities such as health provision, early years provision, schools, colleges and universities, community, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure. Also referred to as Community infrastructure.

~~**Soundscape** The overall quality of an acoustic environment as a place for human experience. Soundscape design might include preserving, reducing or eliminating certain sounds or combining and balancing sounds to create or enhance an attractive and stimulating acoustic environment.~~

~~**Spatial Development Strategy** A plan containing strategic policies prepared by a Mayor or a combined authority. It includes the London Plan (prepared under provisions in the Greater London Authority Act 1999) and plans prepared by combined authorities that have been given equivalent plan-making functions by an order made under the Local Democracy, Economic Development and Construction Act 2009 (as amended~~

Special Areas of Conservation Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.

~~**Specialist Accommodation for Older People** "Some residents living in the borough require specialist accommodation to meet their social, physical, mental and/or health care needs. Specialist accommodation can be divided into three main types:~~

~~• Sheltered housing is self-contained residential accommodation specifically designed and managed for older people (minimum age 55) in need of no or a low level of support. Each household has self-contained accommodation and the schemes normally include additional communal facilities such as a residents lounge. A warden, scheme manager, community alarm/telecare or house manager interacts with residents on a regular basis and is the first point of contact in an emergency.~~

~~• Extra care accommodation (sometimes also referred to as close care, assisted living, very sheltered or continuing care housing): Self-contained residential accommodation and associated facilities designed and managed to meet the needs and aspirations of people who by reason of age or vulnerability have an existing or foreseeable physical, sensory or mental health impairment. Each household has self-contained accommodation and 24 hour access to emergency support. In addition extra care accommodation includes a range of other facilities such as a resident's~~

~~lounge, a guest room, laundry room, day centre activities, a restaurant or some kind of meal provision, fitness facilities and classes and a base for health care workers. The exact mix of facilities will vary on a site by site basis. Some domiciliary care is provided as part of the accommodation package, according to the level of need of each resident. Extra care housing aims to create a balanced community, bringing together a balanced proportion of people with different levels of care needs.~~

~~• Care homes (including end of life/hospice care and dementia care): Nursing or residential care home providing non self-contained residential accommodation for people who by reason of age or illness have physical, sensory or mental impairment, including high levels of dementia. Accommodation is not self-contained: meals and personal services are routinely provided to all residents. Communal facilities are likely to include a dining room and residents lounge. There will be a scheme manager and in house care team who provide a consistent presence. Personal or nursing care is a critical part of the accommodation package. Care homes include 24 hour medical care from a qualified nurse."~~

~~**Specialist Housing** Specialist housing refers to supported housing such as sheltered housing, residential care homes, nursing homes and dual-registered care homes.~~

~~**Stakeholder** A person, group, company, association, etc. with an economic, professional or community interest in the borough or a specific part of it, or that is affected by local developments.~~

~~**Strategic Development** Proposals involving over 100 homes or 10,000 square metres of floorspace.~~

Statement of Community Involvement (SCI) The Statement of Community Involvement sets out the local planning authority's policy for involving the community in the preparation and revision of Local Development Documents and planning applications.

Strategic Areas for Regeneration These areas are the Census Local Super Output Areas (LSOAs) in greatest socio-economic need. They fall within the 20 per cent most deprived LSOAs in England, using the Index of Multiple Deprivation.

~~**Strategic Environmental Assessment** A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment~~

Strategic Flood Risk Assessment (SFRA) ~~"~~An assessment usually under taken by a Local Authority at a borough–wide level that considers flood risk, both fluvial and tidal and examines the risks involved for developing certain areas within the borough in accordance with the NPPF. ~~The Lewisham SFRA was produced by Jacobs and published in July 2008. Areas/sites are categorised as falling within one or more of the following flood zones:~~

~~• Flood Zone 1 Low probability of flooding. Defined as land outside flood zone 2 and having less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%).~~

~~• Flood Zone 2 Medium probability of flooding. Defined as land having between 1 in 100 and 1 in 1000 annual probability of river flooding (1% - 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% - 0.1%) in any year.~~

~~• Flood Zone 3a High probability of flooding. Defined as land having 1 in 100 or greater annual probability of river flooding.~~

~~• Flood Zone 3b Land where water has to flow or be stored in times of flood. Defined as land having a 1 in 20 (5%) or greater annual probability of flooding in any year; or is designed to flood in an extreme (0.1%) flood, or at another probability to be agreed between the local authority and the Environment Agency."~~

Strategic Housing Land Availability Assessment (SHLAA) An assessment of land availability for housing which informs the London Plan and borough local development documents~~, as set out in Planning Policy Statement 3: Housing (PPS3).~~

Strategic Housing Market Assessment (SHMA) An assessment of housing need and demand which informs the London Plan and borough local development documents ~~as set out in Planning Policy Statement 3: Housing (PPS3).~~

Strategic Industrial Location~~s/Land~~ (SIL) London's largest concentrations main reservoirs of industrial, logistics and related capacity for uses that support the functioning of London's economy.

~~**Strategic Policies** Policies and site allocations which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004.~~

Streetscape The appearance of the street as a whole incorporating the road, kerb and gutter, verges, fences, trees and building frontages.

Supplementary Planning Document~~s~~ (SPD) Document~~s~~ which adds further detail to the policies in the development plan. ~~They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents~~ SPDs are capable of being a material consideration in planning decisions but are not part of the development plan.

~~**Sustainability Appraisal** Required by the Planning and Compulsory Purchase Act 2004. Sustainability Appraisal is a based on the principles of Strategic Environmental Assessment but is wider in focus and covers other key considerations of sustainability that also concern social and economic issues.~~

Sustainable d~~D~~evelopment ~~There are three dimensions to sustainable development: economic, social and environmental. The economic role means contributing to a strong, responsive and competitive economy. The social role means supporting strong, vibrant and healthy communities. The environmental role means contributing to protecting and enhancing our natural, built and historic environment. To achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.~~ Development that meets the needs of the present without compromising the ability of future generations to meet their own needs. See also National Planning Policy Framework.

Sustainable Drainage Systems (SuDS) Using sustainable drainage techniques and managing surface water run-off from buildings and hardstandings in a way that reduces the total volume, flow and rate of surface water that runs directly into drains and sewers.

Sustainable t~~T~~ransport m~~M~~odes Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking, ~~and~~ cycling~~, low and ultra-low emission vehicles, car sharing~~ and public transport.

T

Thames Policy Area A special policy area to be defined by boroughs in which detailed appraisals of the riverside will be required.

Town Centre Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

Transport Assessment A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport, and measures that will be needed deal with the anticipated transport impacts of the development

Transport for London One of the GLA group of organisations, accountable to the Mayor, with responsibility for delivering an integrated and sustainable transport strategy for London.

Transport sStatement A simplified version of a transport assessment where it is agreed the transport issues arising from development proposals are limited and a full transport assessment is not required.

Travel pPlan A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and is regularly reviewed

Tree Preservation Order (TPO) May be made to protect individual trees or groups of trees. The Order gives protection against unauthorised felling, lopping, or other tree works.

Trees of value Trees that have the capacity to deliver eco-system benefits in the form of absorbing carbon dioxide and producing oxygen and to filter, absorb and reduce other pollutant gasses including sulphur dioxide, carbon monoxide, nitrogen dioxide and ozone. To achieve improved air quality, trees of value will have large deciduous canopies or have the potential to develop such in the future.

U

Urban gGreening ~~Urban greening describes t~~The ~~act~~ process of adding green infrastructure elements, such as street trees and green roofs, in urban areas.~~that are most applicable in London. Due to the morphology and density of the built environment in the city, green roofs, street trees, and additional vegetation, the most appropriate elements of green infrastructure.~~

Urban Greening Factor (UGF) A land-use planning tool to help determine the amount of greening required in new developments.

~~**Urban Heat Island** The height of buildings and their arrangement means that while more heat is absorbed during the day, it takes longer to escape at night. As a result, the centre of London can be up to 10°C warmer than the rural areas around the city. The temperature difference is usually larger at night than during the day. The Urban Heat Island effect is noticeable during both the summer and winter months.~~

V

Viability aAssessment An assessment of the financial viability of a development to determine the maximum level of affordable housing and other policy requirements where relevant. These should to be undertaken in line with the methodology and approach set out in London Plan Policy H65 and the Mayor's Affordable Housing and Viability SPG.

Viability rReview mMechanism A review of development viability defined with a Section 106 agreement enabling the reassessment of development viability after permission has been granted, at an early, mid or late stage in the development process. These mechanisms address uncertainties in the application stage assessment of viability to enable the maximum level of affordable housing provision over the lifetime of a proposal.

Visitor aAccommodation "Leisure and business accommodation that provides temporary overnight accommodation on a commercial basis, including serviced accommodation such as hotels, bed and breakfast, guesthouses, hostels and campus accommodation, and non-serviced accommodation such as self-catering apart-hotels, caravans and camping."

W

Water spaces Areas covered by water including the River Thames and other rivers, canals, reservoirs, lakes and ponds.

Waterlink Way A long distance cycle/pedestrian route following the River Ravensbourne from the south of the borough to the Thames at Deptford.

~~**Wider Determinants of Health** The wider determinants of health are a diverse range of social, economic and environmental factors which impact on people's health and life expectancy. They include transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks.~~

Windfall dDevelopment (sites) Sites not specifically identified allocated in the development plan.

Z

Zero-carbon Activity that causes no net release of carbon dioxide and other greenhouse gas emissions into the atmosphere.

*These definitions have been referenced primarily from the NPPF (20192021), and The London Plan (20162021). previous Lewisham Council Development Management documents

Appendix 3: Non-strategic policies

The NPPF (2019), paragraph 21, sets out that local plans should identify and distinguish strategic policies from other non-strategic policies. All policies within this Local Plan, including the site allocations, are strategic policies except for the non-strategic policies identified in the table below.

Table 20.2 Non-strategic policies

Part	Section	Reference	Policy title
Two	5	QD8	Noise and vibration
Two	5	QD9	External lighting
Two	5	QD12	Shopfronts
Two	5	QD13	Outdoor advertisements, digital displays and hoardings
Two	8	EC16	Shopping parades, corner shops and other service points
Two	8	EC21	Visitor accommodation
Two	9	CI4	Nurseries and childcare facilities
Two	9	CI5	Burial space
Two	10	GR5	Food growing
Two	12	TR6	Taxis and private hire vehicles

Appendix 4: Policy replacement table and deleted policies

The ~~Regulation 19 stage document will include a schedule of the extant development plan policies which are proposed to be replaced and~~following documents are superseded by the ~~new~~ Lewisham Local Plan ~~policies~~and are therefore deleted.

Development Plan Documents	**Status**
Lewisham Core Strategy	Deleted.
Sites Allocations Local Plan	Deleted.
Lewisham Town Centre Local Plan.	Deleted.
Development Management Local Plan	Deleted.
Guidance Documents	**Status**
Bromley Road, Southend Village Supplementary Planning Document.	Deleted.

Commented [NE814]: Replaced by the new Local Plan, in accordance with the LDS

Commented [NE815]: Deleted. The development principles and guidance for this area, and strategic sites, are covered within the new Local Plan.

Appendix 5 Further information on proposals for public houses

This Appendix must be read in conjunction with ~~draft~~ Local Plan policy EC19 (Public Houses), which sets out requirements for submission of viability and marketing information to support certain types of development proposals. The Council may use its discretion in the application of the requirements on a case-by-case basis. This may include, for instance, to take provide flexibility where development proposals involve the retention of a public house in-situ.

Commented [NE816]: Respond to consultation – some flexibility should be enabled on a case basis, e.g. where pubs are to be retained in situ

Viability statement

In order to ensure that the Council can make a sound assessment when a change of use is p~~P~~roposed, applicants will be required to submit a Viability Statement.

This will need to include:

1. Evidence in the form of at least the last three trading years of audited accounts.

2. All reasonable efforts have been made to preserve the public house (including all diversification options explored) and evidence supplied to illustrate that it would not be economically viable to retain the building or site for its existing use class. Examples of the initiatives or proposals that could be explored are as follows:
a. adding a kitchen and serving food, or improving the existing food offer
b. making the pub, garden, food offer more 'family-friendly'
c. providing events and entertainment such as quiz nights, amplified or non-amplified live music, comedy/cabaret nights
d. hiring rooms out or otherwise providing a venue for local meetings, community groups, businesses, youth groups, children's day nurseries
e. offering take-away food and off-licence services
f. provision of bed & breakfast or other guest accommodation
g. sharing the premises with other businesses
h. altering business and operating hours.

Marketing statement

The Council will require clear evidence of appropriate marketing to show a lack of demand for the public house. This will mean the submission of a Marketing statement including the following information:

1. Details of the company/person who carried out the marketing exercise.

2. The marketing process should last for at least 36 months.

3. The asking price should be pre-agreed in writing with the local planning authority following independent valuation (funded by the developer) by a professional RICS valuer with expertise in the licensed leisure sector and who is not engaged to market the property.

4. The marketing exercise should be sufficiently thorough and utilise all available forms of advertising media and therefore include as a minimum:
a. a for Sale/for Rent signboard
b. adverts in the local press
c. adverts in appropriate trade magazines/ journals
d. adverts on appropriate trade websites
e. adverts through both national and local estate agents (including their websites) and
f. a targeted mail shot or email to an agreed list of potential purchasers.

Local consultation and use of the public house by community and voluntary organisations

The use of public house space for community groups is a valued resource and evidence will be required demonstrating consultation has taken place with local community and voluntary organisations. The applicant will be required to carry out an assessment of the needs of the community for community facilities to show that the existing or former public house is no longer needed and that alternative provision is available in the area.

Where there is local need, this use should be retained or replaced within the building, unless an alternative approach can be identified and agreed. The retention of the ground floor for non-residential use will help maintain street activity and a mixed use neighbourhood.

The Council may also consider adding certain public houses to the Community Assets register if the community support for their retention is significant

Appendix 6 Housing trajectory and 5 Year Housing Land Supply

The trajectory has been updated, informed by the latest Starts and Completions Survey (which had not been undertaken at the time the trajectory was previously published for the September 2022 Mayor and Cabinet). This update provides an opportunity to align the site phasing with the results of the survey and ensure site delivery is more realistic and less ambitious than before. The trajectory will continue to be updated as the Plan progresses towards adoption.

Commented [SA817]: Appendix 6 has been updated

Site progress column:

None	No progress made so far
A21, NX, CTCF	Masterplan/Framework has been prepared
Adopted SA	Site was adopted in the Site Allocations Local Plan
App	Application submitted or advanced pre-application discussions have started
Lapsed	Planning consent has recently lapsed
~~Gr~~NS	Planning permission or resolution to approve has been granted but construction has not yet started
UC	Planning permission has been granted and the s~~S~~ite is under construction
Comp	Site has been completed

The 5 and 15 year supply start from 2023/24, to coincide with the anticipated adoption of the Plan.
Years before and after the 15 year supply are also shown, in order to assess the supply against different targets.

The uplift from the Bell Green sites represents the additional units that could be delivered if a higher growth scenario was adopted, based on an increase in PTAL levels resulting from the Bakerloo Line Extension and/or Bell Green/Lower Sydenham becoming an Opportunity Area.

Key findings

- The site allocations will supply ~~24,421~~24,414 ~~(73~~74%) new homes throughout the 20 year Plan period (2020/21 – 2039/40), consisting of:
  - ~~7,084~~7,085 (29%) in the Central Area
  - ~~12,930~~12,921 ~~-~~(53%) in the North Area
  - 1,244 (5%) in the East Area
  - 2,262 (9%) in the South Area
  - 901 (4%) in the West Area.

- ~~Large~~ Other large consented sites will supply ~~1,514~~1,602 (5%) new homes throughout the 20 year Plan period.

- Small site windfalls will supply ~~7,368~~7,151 (22%) new homes throughout the 20 year Plan period. The small sites will form an important contribution in being able to meet the housing supply targets.

- The majority of the supply comes from the North Area, followed by the Central Area. This is because the site allocations are focussed towards the north and central parts of the borough, where the Opportunity Area is located and in other highly accessible locations, such as major~~-~~ town centres and along the A21 corridor ~~or around the Bell Green/Lower Sydenham area~~.

- Overall, there will be a baseline supply of 33,178 new homes throughout the 20 year Plan period, consisting of site allocations, other large consented sites and small site windfalls. This rises to 35,652 new homes if growth from an additional 2,474 new homes in the Bell Green area is taken into account.

- The baseline supply of housing has been assessed against ~~a range of~~ the 10 year London Plan target as well as the 5 and 15 year NPPF targets. All of these targets have been ~~, all of which can be met or~~ exceeded, as shown in the tables below.

- ~~As the targets have been exceeded, there will be~~ This demonstrates that sufficient homes can be delivered within the ~~20~~ 5 and 15 year ~~Plan~~ period~~, even if some sites do not come forward for development or their delivery is delayed~~.

- The NPPF does not require the Local Plan housing supply to be assessed beyond the 15 year target period. However, the Local Plan runs for 20 years and the housing trajectory demonstrates that there will continue to be a supply of housing provided in the longer term ~~An additional 2,474 new homes could be delivered arising from the growth in the Bell Green area, and this will be helpful in meeting longer term targets, beyond the 15 years.~~.

- The Council will keep under review the Local Plan's housing targets and performance against the delivery of these targets. In particular, the longer term housing supply will be reassessed when the next London wide SHLAA becomes available, as part of the review of the London Plan. Where changes to the London Plan borough-level housing targets are made the local plan review process will be used to ensure Lewisham's Local Plan remains in general conformity with the London Plan.

Site allocation number	Site name	Site size (ha) Italicised = sites less than 1 hectare	Site progress	Pre Plan period	Pre 15 year supply				15 year supply																Post 15 year supply	
				Net units completed prior to April 2019	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40
									Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Yr 10	Yr 11	Yr 12	Yr 13	Yr 14	Yr 15		
LARGE SITES 25 units or more or 0.25 hectatres or more * less than 25 units but contributes to the spatial strategy or non self-contained supply																										
CENTRAL AREA																										
Central Area draft site allocations																										
1	Lewisham Gateway	1.53	UC	362					324	325																
2	Lewisham Shopping Centre	6.38	App									160		157	157	157	158	158	158	158	158	158				
3	Land at Engate Street	*0.81*	A21																							112
4	Conington Road	1.11	UC						121	123	121															
5	Land at Conington Road and Lewisham Road (Tesco)	1.53	App									107	100	100	100											
7	Lewisham Retail Park, Loampit Vale	1.13	NS									200	200	129												
8	110-114 Loampit Vale	*0.12*	None																	30						
9	Silver Road and Axion House	*0.48*	UC						141																	
10	House on the Hill, Slaithwaite Road	*0.31*	A21/App									52														
11	Church Grove Self-Build	*0.35*	UC					36																		
12	Ladywell Play Tower	*0.32*	NS								33															
13	PLACE/Ladywell (Former Ladywell Leisure Centre)	*0.93*	App									106		69												
14	Driving Test Centre, Nightingale Grove	*0.41*	Adopted SA																		40					
15	Land at Nightingale Grove and Maythorne Cottages *	*0.43*	NS									22														
16	Land at Rushey Green and Bradgate Road (Aldi)	*0.50*	A21																					88		
17	Catford Shopping Centre and Milford Towers	3.42	CTCF/App									102		200	200				145	145	146	146				
18	Catford Island	2.28	CTCF/App									250	102	100	150											
19	Laurence House and Civic Centre	2.21	CTCF												87	87	88									
21	Wickes and Halfords, Catford Road	2.06	CTCF											172	170	170										
22	Ravensbourne Retail Park	2.46	A21/App									220		147												
	Total: Central Area site allocations			**362**	**0**	**0**	**0**	**36**	**586**	**448**	**154**	**1219**	**402**	**1074**	**864**	**414**	**246**	**158**	**303**	**333**	**304**	**344**	**0**	**88**	**112**	
Central Area other large consented sites																										
	Land to rear of Chiddingstone House, Lewisham Park	*0.50*	Comp		53																					
	St Mungos, Spring Gardens, Arlington Close	*0.96*	Comp		28																					
	Pheobes Garden Centre	*0.42*	Comp		27																					
	Lewisham Exchange (former Carpetright) (NSC student housing with ratio 2.5:1 applied) *	*0.26*	Comp			370																				
	320 Brownhill Road (NSC care home with 1.1 ratio applied)	*0.11*	Comp				26																			
	9-19 Rushey Green,(former job centre)	*0.13*	UC					45																		
	Lewisham House, 25 Molesworth Street	*0.96*	NS								109	109														
	Catford Timber Yard	*0.17*	NS								52															
	73 Lewisham High Street *		NS								23															
	Colfe and Hatcliffe Glebe (NSC over 60s sheltered units with 1:1 ratio applied) *	*0.12*	NS								22															
	Total: Central Area other large consented sites			**0**	**108**	**370**	**26**	**45**	**0**	**0**	**206**	**109**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	
	Total: Central Area			**362**	**108**	**370**	**26**	**81**	**586**	**448**	**360**	**1328**	**402**	**1074**	**864**	**414**	**246**	**158**	**303**	**333**	**304**	**344**	**0**	**88**	**112**	
NORTH AREA																										
North Area draft site allocations																										
1	Convoys Wharf MEL	20.46	UC						200	225	300	300	260	260	260	260	260	260	260	260	260	60	75			
2	Deptford Landings MEL (formerly known as Oxestalls Road) and Scott House	4.71	UC		203				100	200	250	250	200	120	120	120	120	120	120	17						
3	Evelyn Court LSIS	*0.27*	App									102														
4	Neptune Wharf MEL	1.14	UC						199																	
5	Surrey Canal Road and Trundleys Road LSIS (NSC 393 student beds with 2.5:1 ratio applied + 58 units)	*0.55*	NS								107	108		59												
6	Apollo Business Centre LSIS	*0.42*	App									98														
7	Silwood Estate	*0.25*	NS									61														
9	Surrey Canal Triangle MEL	8.49	NS								335	335	335	335	335	335	335	335	200	200	200	230	230	230	119	

Site allocation number	Site name	Site size (ha) Italicised = sites less than 1 hectare	Site progress	Pre Plan period	Pre 15 year supply				15 year supply															Post 15 year supply	
				Net units completed prior to April 2019	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40
					Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Yr 10	Yr 11	Yr 12	Yr 13	Yr 14	Yr 15								
10	Corner of Besson and Briant Street	1.01	NS								200	124													
11	Former Hatcham Works, New Cross Road	3.67	Adopted SA, NX														100	175	175	175	175				
12	Goodwood Road and New Cross Road	*0.62*	Adopted SA, NX																83	84					
13	Achilles Street	1.40	App									200	100	63											
14	Amersham Vale, Former Deptford Green School (Upper School Site)	*0.68*	Comp				120																		
15	Albany Theatre	*0.61*	None																59	60					
16	Land North of Reginald Road and South of Frankham Street (Former Tidemill School)	1.26	UC						193																
17	Lower Creekside LSIS	1.00	UC						55				55	52											
18	Sun Wharf MEL (including Network Rail Arches)	1.00	App									180	40												
19	Creekside Village East, Thanet Wharf MEL	*0.61*	NS								197	196													
	Total: North Area site allocations			**0**	**203**	**0**	**120**	**0**	**747**	**425**	**1389**	**1954**	**990**	**889**	**715**	**715**	**815**	**890**	**897**	**796**	**635**	**290**	**305**	**230**	**119**
North Area other large consented sites																									
	Anthology, Deptford Foundry	1.12	Comp		316																				
	Bond House	*0.24*	Comp		89																				
	19 Yeoman Street	*0.27*	Comp		72																				
	43-49 Pomoeroy Street	*0.22*	Comp		65																				
	Astra House, 23-25 Arklow Road	*0.17*	Comp			33																			
	Haulage Yard, Hereford Place	*0.09*	UC						26																
	1 White Post Street *	*0.28*	UC						21																
	Shaftsbury Christian Centre, Frankham Street	*0.10*	UC							33															
	Safa House, 28 Arklow Road *	*0.03*	NS								14														
	52-54 New Cross Road	*0.07*	NS								35														
	333-337 New Cross Road (NSC student housing with ratio 2.5:1 applied)	*0.07*	NS								25														
	Former Deptford Green Sports Pitch, Edward Street	*0.23*	Lapsed									34													
	Total: North Area other large consented sites			**0**	**542**	**33**	**0**	**0**	**47**	**33**	**74**	**34**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
	Total: North Area			**0**	**745**	**33**	**120**	**0**	**794**	**458**	**1463**	**1988**	**990**	**889**	**715**	**715**	**815**	**890**	**897**	**796**	**635**	**290**	**305**	**230**	**119**
EAST AREA																									
East Area draft site allocations																									
1	Heathside and Lethbridge Estate	6.07	UC	782					221	222															
2	Blackheath Hill LSIS	*0.31*	NS								63														
3	Leegate Shopping Centre	1.90	App									250	100	100											
4	Sainsbury's Lee Green	1.05	None																						111
5	Land at Lee High Road and Lee Road	*0.43*	None																		55				
6	Southbrook Mews *	*0.24*	None																				23		
7	Mayfields Hostel, Burnt Ash Road *	*0.49*	Lapsed									21													
8	Sainsbury Local and West of Grove Park Station	*0.90*	None																						78
	Total: East Area site allocations			**782**	**0**	**0**	**0**	**0**	**221**	**222**	**63**	**271**	**100**	**100**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**55**	**0**	**23**	**189**
East Area other large consented sites																									
	Stephen James BMW, Lee Terrace	*0.38*	Comp		30																				
	152 Lee High Road *	*0.09*	UC						17																
	Haven and Betuna, Grove Park Road *	*0.08*	NS							20															
	34-40 Eastdown Park *	*0.13*	Lapsed									21													
	Total: East Area other large consented sites			**0**	**30**	**0**	**0**	**0**	**17**	**20**	**0**	**21**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
	Total: East Area			**782**	**30**	**0**	**0**	**0**	**238**	**242**	**63**	**292**	**100**	**100**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**55**	**0**	**23**	**189**
SOUTH AREA																									
South Area draft site allocations																									
1	Former Bell Green Gas Holders and Livesey Memorial Hall	1.66	App									100													
2	Bell Green Retail Park	7.37	Adopted SA													48	100		150	150	150	150			

Site allocation number	Site name	Site size (ha) Italicised = sites less than 1 hectare	Site progress	Pre Plan period	Pre 15 year supply				15 year supply															Post 15 year supply	
				Net units completed prior to April 2019	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40
									Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Yr 10	Yr 11	Yr 12	Yr 13	Yr 14	Yr 15		
3	Sainsbury's Bell Green	5.42	None																	137	137	138	138		
4	Stanton Square LSIS	*0.97*	None																			94			
5	Sydenham Green Group Practice	*0.49*	None																		36				
6	Worsley Bridge Road LSIS	1.26	None																	113					
7	Lidl, Southend Lane *	*0.43*	None																					17	
8	Land at Pool Court *	*0.30*	App									6													
9	Catford Police Station *	*0.32*	A21											24											
10	Homebase / Argos, Bromley Road	1.70	App											141											
11	Beadles Garage	*0.33*	A21																					25	
12	Downham Co-op	*0.43*	None																					42	
13	Excalibur Estate	6.14	UC	57								230													
14	Bestway Cash and Carry	1.70	None																			68	68		
	Total: South Area site allocations			**57**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**336**	**0**	**165**	**0**	**48**	**100**	**0**	**150**	**400**	**323**	**450**	**206**	**84**	**0**
South Area other large consented sites																									
	Kenton Court, 132 Adamsrill Road	*0.21*	Comp				25																		
	1 Melfield Gardens *	*0.47*	Comp				16																		
	1-3 Bellingham Road *	*0.20*	UC					18																	
	Home Park Housing Office, 129 Winchfield Road	*0.24*	UC						31																
	86-92 Bell Green *	*0.03*	Lapsed									23													
	Total: South Area other large consented sites			**0**	**0**	**0**	**41**	**18**	**31**	**0**	**0**	**23**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
	Total: South Area			**57**	**0**	**0**	**41**	**18**	**31**	**0**	**0**	**359**	**0**	**165**	**0**	**48**	**100**	**0**	**150**	**400**	**323**	**450**	**206**	**84**	**0**
West Area draft site allocations																									
1	111 - 115 Endwell Road	*0.38*	Adopted SA											57											
2	6 Mantle Rd *	*0.12*	Adopted SA											20											
3	Jenner Health Centre	*0.41*	None																		30				
4	Land at Forest Hill Station East (Waldram Place and Perry Vale)	*0.21*	Adopted SA																			41			
5	Land at Forest Hill Station West (Devonshire and Dartmouth Roads)	*0.44*	Adopted SA																			80			
6	Perry Vale LSIS	*0.72*	None																			73		73	
7	Clyde Vale LSIS *	*0.12*	None																					21	
8	Featherstone Lodge, Eliot Bank	*0.64*	None																	33					
9	Willow Way LSIS	1.29	None											88	87										
10	74-78 Sydenham Road *	*0.09*	None																						16
11	Land at Sydenham Road and Loxley Close	*0.64*	None																					62	63
12	113 to 157 Sydenham Road	*0.86*	Adopted SA																	53	52	52			
	Total: West Area site allocations			**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**165**	**87**	**0**	**0**	**0**	**0**	**86**	**82**	**246**	**0**	**156**	**79**
West Area other large consented sites																									
	Land rear of 15-17a Tyson Road	*0.92*	Comp		68																				
	Fairway House, rear of Dartmouth Road	*0.01*	Comp		27																				
	Longfield Crescent Estate	1.75	Comp		27																				
	Former Sydenham Police Station	*0.19*	Comp				33																		
	154-158 Sydenham Road	*0.40*	UC					33																	
	Welllington Close, Somerville Estate*	*0.46*	UC					23																	
	Our Lady and St Philip Neri RC Primary School	*0.33*	UC						59																
	Waldram Crescent, Rear of 1-17 Stanstead Road *	*0.11*	UC						22																
	Mayow Park Warehouse (NSC 6 C2 supported living and 26 temporary C3 with ratio 1.8:1 applied) *	*0.10*	UC						18																
	Garages at Knapdale Close *	*0.72*	UC						17																
	Bampton Estate	1.85	UC						0																

Site allocation number	Site name	Site size (ha) Italicised = sites less than 1 hectare	Site progress	Pre Plan period	Pre 15 year supply				15 year supply															Post 15 year supply	
				Net units completed prior to April 2019	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40
									Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Yr 10	Yr 11	Yr 12	Yr 13	Yr 14	Yr 15		
	Regent Business Centre, 291-301 Kirkdale	*0.24*	NS								35														
	Mais House	1.35	NS								110														
	Martin's Yard, Drakefell Yard	*0.36*	App									71													
	Valentine Court	*0.27*	App									45													
	Total: West Area other large consented sites			0	122	0	33	56	116	0	145	116	0	0	0	0	0	0	0	0	0	0	0	0	0
	Total: West Area			0	122	0	33	56	116	0	145	116	0	165	87	0	0	0	0	86	82	246	0	156	79
	Total for Site Allocations			1201	203	0	120	36	1554	1095	1606	3780	1492	2393	1666	1177	1161	1048	1350	1615	1344	1385	511	581	499
	Total for other large consented sites			0	802	403	100	119	211	53	425	303	0	0	0	0	0	0	0	0	0	0	0	0	0
	TOTAL for Large Sites			1201	1005	403	220	155	1765	1148	2031	4083	1492	2393	1666	1177	1161	1048	1350	1615	1344	1385	511	581	499
	SMALL SITES																								
	Borough-wide small site completions				241	133	196																		
	Borough-wide small sites windfall allowance based on London Plan target of 379 p.a.							379	379	379	379	379	379	379	379	379	379	379	379	379	379	379	379	379	379
	TOTAL for Small Sites			0	241	133	196	379	379	379	379	379	379	379	379	379	379	379	379	379	379	379	379	379	379
	TOTAL for Plan Period			1201	1246	536	416	534	2144	1527	2410	4462	1871	2772	2045	1556	1540	1427	1729	1994	1723	1764	890	960	878
	UPLIFT FROM BELL GREEN SITES																								
	Former Bell Green Gas Holders and Livesey Memorial Hall											85	85	85	88										
	Bell Green Retail Park																				216	216	216	216	216
	Sainsbury's Bell Green																				159	159	159	159	161
	Stanton Square LSIS																						68	69	
	Sydenham Green Group Practice																								51
	Worsley Bridge Road LSIS																						66		
	Total for uplift			0	0	0	0	0	0	0	0	85	85	85	88	0	0	0	0	0	375	375	509	444	428
	TOTAL for Plan Period with uplift			1201	1246	536	416	534	2144	1527	2410	4547	1956	2857	2133	1556	1540	1427	1729	1994	2098	2139	1399	1404	1306

Types of target	Relevant years	Target	Assessment
London Plan - 10 year ~~London Plan~~ target	2019/20 – 2028/29	Lewisham's target for a 10 year period is 16,670 (1,667 p.a.), incorporating a small sites target of 379 p.a.	The site allocations, other large consented sites and small site windfalls will supply ~~19,555~~17,918 new homes between 2019/20 – 2028/29. ~~Target exceeded.~~ The supply of housing during the 10 years exceeds the target.
NPPF - 5 year ~~housing land supply~~target	2023/24 – 2027/28	Lewisham's target is ~~2,112~~2,212 p.a. or ~~10,560~~11,060 over the 5 year period. This consists of 3 components: • London Plan housing target: 1,667 p.a. • An appropriate buffer: 5% (or ~~101~~ 83 units p.a.) has been added to the 1,667 annual target, given Lewisham's 87% performance in the last Housing Delivery Test. • A backlog: completions during 2019/20 to 2021/22 amounted to 2,231 compared to the London Plan target of 5,001 over the same period. This creates an undersupply of 2,770 new homes as at the end of 2021/22. This backlog will be catered for by the end of the first 5 years (2027/28) and is equivalent to 462 p.a.	The site allocations, other large consented sites and small site windfalls will provide specific deliverable sites amounting to ~~12,838~~12,414 new homes between 2023/24 – 2027/28. The supply of housing during the 5 years exceeds the target. ~~Target exceeded.~~
NPPF - Number of deliverable years	2023/24 – 2027/28	Lewisham's 5 year supply is assessed against the annual target of ~~2,211~~ 2,212 pa (1,667 p.a. plus 5% buffer of 83 units p.a. and ~~344~~ 462 p.a. backlog), to demonstrate more than 5 years' worth of supply.	The site allocations, other large consented sites and small site windfalls will supply ~~12,838~~ 12,414 new homes between 2023/24 – 2027/28. When divided by ~~2,112~~ 2,212 p.a. there will be ~~6.08~~5.61 deliverable years, exceeding the target. ~~Target exceeded.~~ The target can also be exceeded if the buffer is increased to 10% (with ~~5.80~~5.41 deliverable years) or 20% (with ~~5.32~~5.04 deliverable years~~)~~.
NPPF - 15 year ~~housing land supply~~target	2023/24 – 2037/38	Lewisham's target is ~~27,230~~ 27,730 over the 15 year period. This consists of ~~2,112~~ 2,212 p.a. for years 1-5, then the target of 1,667 p.a. has been rolled forward for years 6-15.	The site allocations, other large consented sites and small site windfalls will supply ~~27,889~~ 29,854 new homes between 2023/24 – 2037/38. ~~This is 659 more than the target.~~ The supply of housing during the 15 years exceeds the target. ~~Target exceeded.~~
NPPF - Delivery through small sites	2020/21 - 2039/40	Land to accommodate at least 10% of the target on sites no larger than 1 hectare.	• ~~2,128~~2,195 or 20% of the 5 year target (~~10,560~~11,060) will be provided on site allocations and other large consented sites of 1 hectare or less. This rises to 4,090 (37%) if small site windfalls are taken into account.

			• ~~3,298~~3,379 ~~-~~or 12% of the 15 year target (~~27,230~~27,730) will be provided on site allocations and other large consented sites ~~-~~of 1 hectare or less. This rises to 9,064 (33%) if small site windfalls are taken into account. • ~~3,655~~4,765 ~~-~~or ~~15~~14% of the ~~24,241 site allocations~~supply across the 20 year plan period (33,178) will be on site allocations and other large consented sites ~~sites~~of 1 hectare or less. This rises to 11,919 (36%) if small site windfalls are taken into account.~~**Target exceeded.**~~ • Any additional s~~S~~mall site windfalls will increase this supply further.

21 Schedules

Schedule 1: Strategic and local views, vistas and landmarks

Table 21.1 Table showing designated views and local landmarks

Site address	Easting (X) Coordinate	Northing (Y) Coordinate
London Strategic Views		
Blackheath ~~Central~~ Point to Central London	538306	176822
Alexandra Palace to Central London		
Primrose Hill to Central London		
Kenwood to Central London		
Parliament Hill to Central London		
Greenwich Park to Central London		
Local Land Marks		
Horniman Museum (front façade) at London Road, Forest Hill	534860	173105
The Apostles (formerly Christ Church) at Church Rise, Forest Hill	535747	172819
St. Bartholomew's Church at Westwood Hill, Sydenham	535096	171671
St Pauls Church at Marry Ann Gardens, Deptford	537287	177480
St Mary's the Virgin Parish Church at Lewisham High Street, Lewisham	537942	174836
Ladywell Water Tower at Dressington Avenue, Ladywell	537260	174556
Lewisham Clock Tower at Lewisham High Street, Lewisham	538332	175596
All Saints Church at All Saints Drive, Blackheath	539549	176275
Lewisham Local Views		
Horniman Gardens at London Road, Forest Hill	534860	173237
Telegraph Hill Upper Park at Kitto Road, Telegraph Hill	537458	176070

Commented [KK818]: Coordinates have been omitted for these as the starting points for these views fall outside of the borough boundary

Foreshore at Strand, North Deptford	536848	178584
Blythe Hill Fields at Blyte Hill Lane, Blythe Hilll	536614	173824
Hilly Fields at Vicars Hill, Brockley	537347	175309
Mountsfield Park at Stainton Road, Hither Green	538415	173924
Forster Memorial Park at Whitefoot Lane, Downham	538771	172226

Schedule 2: Designated heritage assets

Conservation Areas
Belmont, Blackheath, Brockley, Brookmill Road, Christmas Estate, Cobbs Corner, Culverley Green, Deptford Creekside, Deptford High Street and St Pauls, Forest Hill, Halifax Street, Hatcham, Jews Walk, Ladywell, Lee Manor, Lewisham Park, Mercia Grove, Somerset Gardens, St Johns, St Marys, St Pauls, St Stephens, Stanstead Grove, Sydenham Hill / Mount Gardens, Sydenham Park, Telegraph Hill

Article 4 Directions on the Historic Environment
Baring Hall Hotel, Beckenham Place Park, Belmont, Blackheath, Brockley, Brookmill Road, Cobbs Corner, Culverley Green, Deptford Creekside, Deptford High Street and St Pauls, Deptford Town Hall, Forest Hill, Halifax Street, Hatcham, Jews Walk, Ladywell, Lammas Green, Lee Manor, Lewisham Park, Mercia Grove, Perry Vale and Christmas Estate, Perry Fields, Somerset Gardens, St Johns, St Marys, St Stephens, Stanstead Grove, Sydenham Hill, Sydenham Park, Sydenham Thorpe's, Telegraph Hill

World Heritage Site
Maritime Greenwich

Scheduled Ancient Monument
The Tudor Naval Storehouse in the former Royal Naval Shipyard, Deptford, now known as Convoys Wharf

Registered Parks and Gardens
Grove Park Cemetery, Manor Park Gardens

London Squares
Addington Grove, Adelaide Avenue, Culverley Green - Culverley Road, Deptford Memorial Gardens, Dermody Road, Duncombe Hill, Fambridge Close, Lewisham High Street London Squares (west side between Bradgate Road and Ladywell Road), Lewisham Memorial Gardens - Lewisham High Street, Lewisham Way/Wickham Road, London Squares at Catford (Rushey Green east side between Davenport and Rosenthal Road and squares to the north and south of junction with Brownhill Road), Wickham Gardens

Schedule 3: Non-designated heritage assets

Archaeological Priority Area (APA) and name
APA1: Thames Alluvial Floodplain, APA2: Thames and Ravensbourne Terrace Gravels, APA3: Watling Street and the 'Deep-Ford', APA4: London - Lewes Roman Road, APA5: Bell Green, APA6: Lewisham and Catford/Rushey Green, APA7: Deptford - The Strand, Sayes Court and Royal Naval Dockyard, APA8: Deptford Creek, APA9: Upper Deptford APA10: Deptford - The Broadway and Tanners Hill, APA11: Lee, APA12: Sydenham, APA13: Southend, APA14: New Cross APA15: Perry Street APA16: Brockley jack APA17: Brockley Priory APA18: Blackheath and Blackheath Village APA19: The Manor House, Lee APA20: Beckenham Place Park APA21: Wells Park

Areas of Special Local Character
Silk Mills Path, Loampit Hill, Dermody Gardens, Manor Park, Lee Green, Rockbourne Park, ~~Sydenham Extension~~ Kirkdale, Hall Drive, Charleville Circus, Woolstone and Hurstbourne Roads, Bellingham Estate, Sydenham Hill Ridge

Commented [NE819]: Respond to consultation – request that Sydenham Hill Ridge be included as an ASLC, in line with extant plan

Local List of Buildings of Architectural or Historic Interest
Local List is available on Council's Planning Webpage. Subject to periodic review and updating.

Schedule 4: Designated employment land

Type	Ref	Location	Proposed changes to Policies Map
Strategic Industrial Location	SIL	Bromley Road Surrey Canal Road	**Bromley Road** Shopping frontages along Randlesdown Road de-designated from SIL. **Surrey Canal Road** Bermondsey Dive Under site designated as SIL. Evelyn Court, Apollo Business Centre and Land at Surrey Canal Road and Trundelys Road sites de-designated from SIL.

Locally Significant Industrial Site	LSIS	Apollo Business Centre Blackheath Hill Childers Street West Clyde Vale Endwell Rd Evelyn Court Evelyn Street Lower Creekside Malham Rd (with 118 Stanstead Rd) Manor Lane Molesworth Street Perry Vale Stanton Square Trundleys Road Willow Way Worsley Bridge Rd Bermondsey Dive Under (part) Lewisham Way	**Terminology** Local Employment Land (LEL) re-named LSIS for consistency with terminology used in London Plan. **Childers Street** Childers Street West designated LSIS. (Childers Street East remains designated MEL). **Malham Road** 188 Stansted Road designated as LSIS. **Apollo Business Centre, Evelyn Counrt, Trundleys Road, Bermondsey Diver Under (part)** Re-designated as LSIS from SIL
Mixed-use Employment Location	MEL	Arklow Rd Childers Street East Convoys Wharf Grinstead Rd Oxestalls Rd Plough Way Sun and Kent Wharf Surrey Canal Triangle Creekside Village East, Thanet Wharf	**Childers Street** Childers Street East remains designated MEL. (Childers Street West designated as LSIS).
Non-designated employment site	Not Applicable	Dispersed throughout Borough	

Schedule 5: Town centres and Primary Shopping Areas

Town centre	Primary Shopping Area	~~Proposed changes to Policies Map~~
~~MAJOR~~		
Lewisham	Lewisham High Street: 212 to 50, 197 to 131 and 85 to 93 Lewis Grove: 129 to 97 and 1 to 43 Lewisham shopping centre: ground floor units Lewisham Gateway: ground floor units	~~**Town centre boundary**~~ ~~Amended to include: 129 Lewisham High Street; 100 Granville Park; Prendergast Vale School Cornmill Garderns; the remainder of Connington Road to Elverson Road DLR Station; the remainder of Lee High Rd (including Manor Park Parade) to Halley Gardens.~~ ~~**Shopping frontages**~~ ~~Primary and secondary frontages removed. Replaced by Primary Shopping Area.~~
Catford	Catford Broadway: ground floor units Catford Road: Station Buildings and 1 to 9 Winslade Way: 36 to 2, 38 to 6 and 123 to 9 Rushey Green: 58 to 166 and 75 to 199	~~**Town centre boundary**~~ ~~Amended to include: Catford Station; Grosvenour Court at Adenmore Road;~~ ~~Halford and Wickes site.~~ ~~Amended to exclude: Residential properties bounded by Brownhill Road, Plassy Road, Bowness Road and Engleheart Road;~~ ~~Residential building at Scooby Street; Holbeach School; Residential properties consisting of terraced housing bounded by Doggett Road, Thomas Lane, Holbeach Road and Catford Road.~~ ~~**Shopping frontages**~~ ~~Primary and secondary frontages removed. Replaced by Primary Shopping Area.~~
DISTRICT	**Primary Shopping Area**	
Blackheath	Tranquil Vale: 1 to 49, 36 to 74 and 16 Montpelier Vale: 2 to 36 and 1 to 47 Blackheath Village: 0 to 16 and 1 to 11 Royal Parade: 8 to 17	~~**Shopping frontages**~~ ~~Primary and secondary frontages removed. Replaced by Primary Shopping Area.~~
Deptford	Deptford High Street: 1 to 179 and 2 to 164 Deptford Broadway: 1	~~**Town centre boundary**~~ ~~Amended to include: The area and properties bounded by Evelyn Street, Deptford High Street and Albury Street.~~

Commented [NE820]: Deleted – not required for Regulation 19 plan. These will be set out on the Policies Map.

	Deptford Market Yard: Carriage way, Arches and 2 St Pauls House	~~**Shopping frontages**~~ ~~Primary and secondary frontages removed. Replaced by Primary Shopping Area.~~
Downham	Bromley Road: 436 to 500 and 431 to 499	~~**Shopping frontages**~~ ~~Primary and secondary frontages removed. Replaced by Primary Shopping Area.~~
Forest Hill	London Road: 1 to 55 and 2 to 56 David's Road: 1 to 5 Devonshire Road: 2 to Forest Hill Station and 1 to 7 Dartmouth Road: 1 to 35 and 2 to 28	~~**Shopping frontages**~~ ~~Primary and secondary frontages removed. Replaced by Primary Shopping Area.~~
Lee Green	Burnt Ash Road: 2 to 14, 1 to 27 and the Leegate Centre Eltham Road: 2 to 18 Lee High Road: 432 to 422 and 321 to 351 Lee Road: 128 to 120	~~**Shopping frontages**~~ ~~Primary and secondary frontages removed. Replaced by Primary Shopping Area.~~
New Cross	New Cross Road: 257 to 407	~~**Town centre boundary**~~ ~~Extended to include: 256 to 268 New Cross Road~~ ~~**Shopping frontages**~~ ~~Primary and secondary frontages removed. Replaced by Primary Shopping Area.~~
New Cross Road	Not applicable (See Local Centres for further information)	~~**Town centre hierarchy**~~ ~~De-designated as District Centre, and re-designated Local Centre.~~
Sydenham	Sydenham Road: 4 to 78 and 3 to 111 Sydenham Station Approach: 2 to 12 Kirkdale: 313 to 325 and 260 to 278	~~**Town centre boundary**~~ ~~Amended to include: 180 to 190 Sydenham Road~~ ~~**Shopping frontages**~~ ~~Primary and secondary frontages removed. Replaced by Primary Shopping Area.~~
LOCAL	**Local Centre frontages**	
All centres	Not applicable	~~**Terminology**~~ ~~Neighbourhood Local Centre re-named Local Centre.~~
Bellingham	Randlesdown Road: 4 to 50 and the Fellowship	~~**Town centre hierarchy**~~ ~~New designated Local Centre.~~

	Bromley Road: 205 to 265	
Brockley	Coulgate Street: all ground floor units Harefield Road: 1 to 7 Brockley Road: 186 to 188 and 169 to 201 Brockley Cross: 1 to 9, 21 to 25 and 2 to 28 Endwell: 100 to 110 Malpas Road: 253 to 259 and 246 to 248	
~~Burnt Ash~~Lee Station	Burnt Ash Road: 111 to 133 and 116 to 136 Burnt Ash Hill: 1 to 45	~~**Town centre hierarchy**~~ ~~New designated Local Centre.~~
Crofton Park	Brockley Road: 322 to 410, 349 to 409 and 435 to 447	
Downham Way	Downham Way: 419, 431 to 457 and 430 to 406	
Evelyn Street	Evelyn Street: 262 to 232, 299 to 321, 204 to 210, 186 to 190, 154 to 166 and 195	~~**Town centre hierarchy**~~ ~~New designated Local Centre.~~
Grove Park	Baring Road: 342 to 386 and 293 to 325 Downham Way: 589 and 636 to 650	
Honor Oak and Brockley Rise	Honor Oak Park: 38 to 78, 25 to 63 and 1 to 5 Brockley Rise: 56 to 104 and 119 to 139	~~**Town centre hierarchy**~~ ~~New designated Local Centre.~~
Ladywell	Ladywell Road: 71 to 111 and 38 to 80 Algernon Road: 251 to 259 and 222 to 230	~~**Town centre hierarchy**~~ ~~New designated Local Centre.~~
Lewisham Way	Lewisham Way: 119 to 249, 138 to 154 and 110 to 118 The Parade Upper Brockley Road: 7a to 13	
New Cross Road	Queens Road: 387 to 401 New Cross Road: 105 to 205, 92 to 110 and 116 to 184	~~**Town centre hierarchy**~~ ~~De-designated as District Centre.~~ ~~Designated Local Centre~~
Staplehurst Road	Staplehurst Road: 9 to 37 and 2 to 28	~~**Town centre hierarchy**~~ ~~New designated Local Centre.~~

~~Upper Sydenham~~Kirkdale	Kirkdale road: 92 to 112 150 and 97 to 191 Dartmouth Road: 184 to 190	~~**Town centre hierarchy**~~ ~~New designated Local Centre.~~
Hither Green Lane	Hither Green Lane 232 to 166 and 191	

Commented [NE821]: Respond to consultation – further review of local centres, results in new designation for Hither Green Lane (elevated from parade)

Schedule 6: CEZ, Cultural Quarters and Night-time Economy Hubs

Lewisham North Creative Enterprise Zone applies to the following wards
Evelyn, New Cross, Telegraph Hill (part), Brockley (Part)

Cultural Quarters	**Location**
Deptford	Deptford District Centre and west of Deptford Creek
New Cross	Goldsmiths College, northern end of Lewisham Way and western end of New Cross Road
Forest Hill	118 Stanstead Road, west of the railway line within Forest Hill District Centre, Horniman Museum and Gardens and Horniman Play Park.

Night-time Economy Hubs	
Location	**Type**
Lewisham Major Centre	Area with more than local significance (NT3)
Catford Major Centre	Area with more than local significance (NT3)
Blackheath District Centre	Area with more than local significance (NT3)
New Cross Gate District Centre	Area with more than local significance (NT3)
New Cross Road Local Centre	Area with more than local significance (NT3)
Deptford District Centre	Area with local significance
Forest Hill District Centre	Area with local significance

Schedule 7: Designated Open Spaces

Commented [NE822]: Respond to consultation – Part 2 Open space policies and land use designations have been comprehensively reviewed following the Regulation 18 consultation. The amended designations take into account new evidence, including the Open Spaces Review.

Table 21.2: Table showing a list of open spaces their designations

Site	**Open Space Type**	**Open Space Designation**
Admiralty Square	Parks and Gardens	SOS
Alanthus Close Green	Formal Amenity Greenspace	SOS
Abbotshall Rd, The Healthy Lifestyle Centre	~~Sports Ground~~ Outdoor Sports Facilities	SOS~~UGS~~
~~Adamsrill Rd, disused allotments~~	~~Allotments~~	~~UGS~~
~~Adolf St/Overdown Rd~~	~~Allotments~~	~~UGS~~
Albion ~~Villa~~s Millennium Green	~~Miscellaneous - Amenity Greenspace~~ Natural and Semi-natural Urban Green Space	SOS~~POS~~
Aragon Gardens	Parks and Gardens	SOS
Arcus Road Housing Green (North)	Formal Amenity Greenspace	SOS

Arcus Road Housing Green (South)	Formal Amenity Greenspace	SOS
Bellingham Leisure and Lifestyle Centre~~ Randlesdown Rd~~	Outdoor Sports Facilities~~Sports Ground~~	~~UGS~~SOS
Ballamore/Shroffold Rd	Allotments and Community Gardens	SOS~~UGS~~
~~Baring Rd and Bramdean Rd r/o~~	~~Allotments~~	~~MOL/UGS~~
Barmeston Rd	Allotments and Community Gardens	SOS~~UGS~~
Barriedale	Allotments and Community Gardens	~~UGS~~SOS
Bawtree Road	Formal Amenity Greenspace	SOS
Baxter's Field~~, Radlet Avenue~~	Park and Gardens	~~POS~~SOS
Beachborough Gardens~~, Beachborough Rd~~	~~Miscellaneous - Amenity Greenspace~~ Formal Amenity Greenspace	~~POS~~SOS
Beaulieu Avenue Green	~~Miscellaneous - Amenity Greenspace~~ Formal Amenity Greenspace	~~UGS~~SOS
~~Beckenham Hill Park~~	~~Miscellaneous - Amenity Greenspace~~	~~POS/Green Grid~~
Beckenham Hill Railway Cutting	Green Corridor	Green Corridor
Beckenham Place Park	Parks and Gardens	MOL/~~POS/Green Grid~~SOS
Beckenham Place Park Common	Parks and Gardens	MOL/SOS
Beckenham Place Park Summerhouse Fields	Parks and Gardens	MOL/SOS
Bell Green Pond	Natural and Semi-natural Urban Green Space	MOL/SOS
Bellingham Bowling Club, Greenside Close, Penderry Rise	Outdoor Sports Facilities~~Sports Ground~~	UGS
Bellingham Green	Parks and Gardens	SOS~~POS~~
Bellingham Leisure and Lifestyle Centre	Outdoor Sports Facilities	SOS
Bellingham Play Park~~, Winsford Rd~~	Parks and Gardens	MOL/SOS~~POS~~
~~Besson Street Nature Reserve~~ Besson Street Community Garden	Allotments and Community Gardens~~Miscellaneous~~	SOS~~POS~~
Blackheath	Parks and Gardens	MOL/SOS~~POS/Green Grid~~
Blackhorse Road	Allotments and Community Gardens	SOS
Blythe Hill	Allotments and Community Gardens	SOS
~~Catford & Cyphers Cricket Club, Rubens St~~	~~Sports Ground~~	~~MOL/UGS~~
~~Blackhorse Rd~~	~~Allotments~~	~~UGS~~
~~Blythe Hill~~	~~Allotments~~	~~UGS~~
Blythe Hill Fields	Parks and Gardens ~~, SINC~~	~~POS~~

		~~Proposed change to Policies Map~~ ~~Open space status changed to POS and MOL~~MOL/SOS
Boyland Road Housing Green	Formal Amenity Greenspace	SOS
Bramdean Crescent Housing Green	Formal Amenity Greenspace	SOS
Bridge Leisure and Lifestyle Centre East~~, Kangley Bridge Rd~~	Outdoor Sports Facilities~~Sports Ground~~	~~UGS~~SOS
Bridge Leisure Centre West~~, Kangley Bridge Rd~~	~~-~~Outdoor Sports Facilities~~Sports Ground~~	~~UGS~~SOS
Bridgehouse Meadows~~, Surrey Canal Rd~~	Natural and Semi-natural Urban Greenspace~~Park~~	~~POS~~SOS
Bridgehouse Nature Area	Natural and Semi-natural Urban Greenspace	SOS
British Gas Land Buffer Zone	Urban Natural and Semi-natural Greenspace	SOS
~~BRdmead~~ Broadmead	Allotments and Community Gardens~~Allotments~~	~~UGS~~SOS
~~BRdway Fields West, Brookmill Rd~~ Broadway Fields	Parks and Gardens	MOL/SOS~~POS~~
~~Broadway Fields East, Deals Gateway~~	~~Park~~	~~POS~~
Brockley & Ladywell Cemetery	Cemeteries, Churches and Disused Churchyards~~Miscellaneous Cemeteries and churchyards~~	~~POS~~SOS
Brockley Railway Cutting	Green Corridor	SOS
~~Brockley Hill Private Gardens~~	~~Miscellaneous – Private Gardens~~	~~UGS~~
Brockley Station Community Garden	Allotments and Community Gardens	SOS
Bromley Hill Cemetery	Cemeteries, Churches and Disused Churchyards~~Miscellaneous – Cemeteries and churchyards~~	~~POS~~SOS
Brookmill Nature Reserve~~, Brookmill Rd~~	Natural and Semi-natural Urban Greenspace~~Miscellaneous -~~	~~UGS~~SOS
Brookmill Park~~, River Ravensbourne and Nature Area~~	Parks and Gardens~~, SINC~~	MOL/~~UGS/POS~~SOS
Buckthorne Nature Reserve	Natural and Semi-natural Urban Greenspace	MOL/SOS
Burnt Ash Pond Nature Reserve~~, Melrose Close~~	~~Miscellaneous~~ - Natural and Semi-natural Urban Greenspace	~~UGS~~SOS

Castillon Rd	Allotments and Community Gardens	SOS~~UGS~~
Castleton Road, Marvels Lane Green	Formal Amenity Greenspace	SOS
Catford Cyphers Cricket Club, Rubens St,	Outdoor Sports Facilities	MOL/SOS
Catford Embankment	Green Corridor	SOS
Catford Wanderers Sports Club, Beckenham Hill Rd	Outdoor Sports Facilities~~Sports Ground~~	~~UGS~~SOS
Charlottenburg Park	Parks and Gardens	SOS
~~Chinbrook Community Orchard~~	~~Miscellaneous - SINC~~	~~MOL/UGS/Green Grid~~
Chinbrook Meadows (Lewisham)	Allotments and Community Gardens	MOL/~~UGS/Green Grid~~SOS
Chinbrook Meadows	Parks and Gardens~~, Green Corridor~~	MOL/SOS~~POS/Green Grid~~
Chinbrook Meadows Lane	Green Corridor	MOL/SOS
Chingley Close Housing Green	Formal Amenity Greenspace	SOS
Christ Church Chapel	Cemeteries, Churches and Disused Churchyards	SOS
Clarendon Rise/Dermody Rd	Allotments and Community Gardens	SOS~~UGS~~
Clyde Street Green	Formal Amenity Greenspace	SOS
~~Conington Rd~~	~~Miscellaneous – Amenity Greenspace~~	~~POS~~
Confluence Park	Parks and Gardens	SOS
Conisborough College	Outdoor Sports Facilities	SOS
Cornmill Gardens	Parks and Gardens	MOL/SOS~~POS~~
Cox wood	Natural and Semi-natural Urban Greenspace	MOL/SOS
~~Crossfield Street Open Space~~	~~Miscellaneous – Amenity Greenspace~~	~~POS~~
~~Culverley Green~~	~~Miscellaneous – Amenity Greenspace~~	~~POS~~
Creekside Discovery Centre	Natural and Semi-natural Urban Greenspace	SOS
Crofton Park Cutting & Embankment	Green Corridor	SOS
Crofton Park Railway Garden	Allotments and Community Gardens	SOS
Dacre Park	Allotments and Community Gardens	~~UGS~~SOS
Dacres Wood Nature Reserve~~, Dacres Rd~~	Natural and Semi-natural Greenspace Urban Greenspace ~~Miscellaneous~~	SOS~~POS~~
Dagonet Gardens Housing Green	Formal Amenity Greenspace	SOS
~~Dartmouth Rd Open Space~~	~~Miscellaneous – Amenity Greenspace~~	~~POS~~

De Frene Rd ~~Allotments r/o 37~~Market Garden	Allotments and Community Gardens	~~UGS~~SOS
Deals Gateway Pocket Park	Formal Amenity Greenspace	
Deloraine Street	Allotments and Community Gardens	~~UGS~~SOS
Deptford Allotments	Allotments and Community Gardens	SOS
Deptford Creek	Green Corridor	SOS
Deptford Green School Playing Field	Outdoor Sports Facilities	SOS
Deptford Railway Meadow	Natural and Semi-natural Urban Greenspace	SOS
Deptford Park	Parks and Gardens	SOS~~POS~~
Devonshire Rd Nature Reserve	Natural and Semi-natural Urban Greenspace~~Miscellaneous~~	~~UGS~~SOS
Downham Playing Fields	Parks and Gardens~~Miscellaneous – Playing Fields~~	POS
Downham Woodland Walk Nature Reserve	Natural and Semi-natural Urban Greenspace	SOS
Downham Way, The Green	Natural and semi-natural Urbangreenspace~~Miscellaneous – Amenity Greenspace~~	~~POS~~SOS
Duncombe Hill	Formal Amenity Greenspace	SOS
Durham Hill (Downham Fields)	Parks and Gardens	~~POS~~SOS
East Hither Green Railway Embankment	Green Corridor	SOS
East Lee Railway Embankment	Green Corridor	SOS
East of Hardcastle Close	Green Corridor	SOS
Eckington Gardens~~, Casella Rd~~	Parks and Gardens	~~POS~~SOS
Edith Nesbitt Gardens~~, Leyland Rd, Osberton Rd~~	Parks and Gardens	~~POS~~SOS
Edward Street	Allotments and Community Gardens	~~UGS~~SOS
~~Edward Street play area (New Deptford Green)~~	~~Miscellaneous – Playing courts~~	~~UGS~~
~~Elfrida Crescent East~~	~~Miscellaneous – Amenity Greenspace~~	~~UGS~~
Elliot Bank Hedge	Formal Amenity Greenspace	SOS
Elliott Forde Park	Parks and Gardens	SOS
Elm Lane Sports Ground	Outdoor Sports Facilities~~Sports Ground~~	MOL/~~UGS/Green Grid~~SOS
Evelyn Green	Parks and Gardens	~~POS~~SOS
Exford Rd ~~Allotments~~	Allotments and Community Gardens	MOL/~~UGS~~SOS

~~Exford Rd Allotments Entrance~~	~~Miscellaneous – Amenity Greenspace~~	~~MOL/UGS~~
Exford Rd/Burnt Ash Hill Triangle	Formal Amenity Greenspace~~Miscellaneous – Amenity Greenspace~~	~~UGS~~SOS
Farmstead Road Community Garden	Allotments and Community Gardens	SOS
Farmstead Rd Housing Green ~~/Overdown Rd~~	Formal Amenity Greenspace~~Miscellaneous – Amenity Greenspace~~	~~UGS~~SOS
Ferranti Park	Parks and Gardens	~~POS~~SOS
Firhill Rd North Allotments	Allotments and Community Gardens	SOS
Firhill Rd Playing fields	Outdoor Sports Facilities~~Sports Ground~~	MOL/~~UGS/Green Grid~~SOS
Firhill Rd North Allotments	Allotments and Community Gardens	~~UGS~~SOS
Firhill Rd South Allotments	Allotments and Community Gardens	~~UGS~~SOS
Folkestone Gardens~~, Trundleys Rd~~	Parks and Gardens	~~POS~~SOS
Fordham Park~~, Pagnell Street~~	Parks and Gardens	~~POS~~SOS
Forest Hill Bowls Club, Wynell Rd	Outdoor Sports Facilities ~~Sports Ground~~	SOS~~UGS~~
Forest Hill School Sports MUGA	Outdoor Sports Facilities	SOS
Forster Memorial Park	Parks and Gardens	SOS~~POS~~
Frendsbury Gardens	Parks and Gardens	SOS
Friendly Gardens	Parks and Gardens	~~POS~~SOS
Friendly Street Cutting	Green Corridor	SOS
Garthorne Rd Nature Reserve	~~Miscellaneous – SINC~~ Natural and Semi-natural Urban Greenspace	~~UGS~~SOS
Gareth Grove Housing Green	Formal Amenity Greenspace	SOS
~~Grangemill Way Allotments~~	~~Allotments~~	~~UGS~~
~~Ghent Street~~	~~Miscellaneous – Amenity Green Space~~	~~UGS~~
Gilmore Rd Triangle	Natural and Semi-natural Urban Greenspace~~Park~~	SOS~~POS~~
Goan Club, Ravensbourne Avenue	Outdoor Sports Facilities~~Sports Ground~~	MOL/SOS~~UGS~~
Goldsmiths' College Green	~~Miscellaneous –~~Formal Amenity Green Space	~~UGS~~SOS
Goldsmiths' College Tennis Court	Outdoor Sports Facilities	SOS
Grove Close Green Space	Formal Amenity Greenspace	SOS
Grove Park Cemetery	~~Miscellaneous – Cemeteries and~~	MOL/SOS/ ~~Green Grid~~

	~~churchyards~~ Cemeteries, Churches and Disused Churchyards	
Grove Park Library and Gardens	Parks and Gardens	MOL/~~POS/ Green Grid~~SOS
Grove Park Library Nature Reserve	Natural and Semi-natural Urban Greenspace	MOL/SOS
Grow Mayow Community Garden	Allotments and Community Gardens	SOS
~~Guys Hospital Sports Ground, Brockley Rise~~	~~Sports Ground~~	~~UGS~~
Haberdashers' Aske's Knights Academy	Outdoor Sports Facilities	SOS
Hall Drive Housing Green	Formal Amenity Greenspace	SOS
Hatcham Gardens	Parks and Gardens	~~POS~~SOS
Hazelbank Rd Allotments	Allotments and Community Gardens	~~UGS~~SOS
Hedge Walk	Allotments and Community Gardens	SOS
Hillcrest Estate Woodland	Natural and Semi-natural Urban Greenspace	SOS
Hilly Fields	Parks and Gardens	~~POS~~SOS/MOL
Hither Green Sidings	Miscellaneous –open green space, SINC	MOL
Hither Green Cemetery	Cemeteries, Churches and Disused Churchyards~~Miscellaneous – Cemeteries and churchyards~~	MOL/~~Green Grid~~SOS
Hither Green Embankment- North	Green Corridor	SOS
Hither Green North-East Railway Cutting	Green Corridor	SOS
Hither Green Railway Land 1	Green Corridor	MOL/SOS
Hither Green Railway Land 2	Green Corridor	SOS
Hither Green Railway Land 3	Green Corridor	SOS
Hither Green Triangle Nature Reserve	Natural and Semi-natural Urban Greenspace~~Miscellaneous~~	MOL/~~UGS~~SOS
Hither Green South East Embankment	Green Corridor	SOS
Hither Green South East Railway Embankment	Green Corridor	SOS
Hocket Close	Formal Amenity Greenspace	SOS
Home Park	Parks and Gardens	~~POS~~SOS
Honor Oak Covered Reservoir	Natural and Semi-natural Urban Greenspace	SOS
Honor Oak Adventure Playground ~~and Nature Reserve~~	Provision for Children and Young People ~~Miscellaneous~~	~~UGS~~MOL

Honor Oak Covered Reservoir	Natural and Semi-natural Urban GreenspaceMiscellaneous – SINC	SOSUGS
Honor Oak Cutting	Green Corridor	MOL (part)/SOS
Honor Oak Sports Ground	Outdoor Sports Facilities	SOS
Horniman Museum and Gardens	Parks and Gardens	MOL/POS/Green GridSOS
Horniman Nature Trail	Natural and Semi-natural Urban Greenspace	MOL/SOS
Horniman's Triangle Play Park	Parks and Gardens	POS/ Green GridSOS
Horniman Drive/Rocombe Crescent Triangle	Miscellaneous – Amenity Greenspace	UGS
Hurstbourne Rd Allotments	Allotments and Community Gardens	UGSSOS
Iona Close Orchard	Natural and Semi-natural Urban Greenspace	SOS
Jim Hurren Allotments, Overdown Rd (south)	Allotments and Community Gardens	UGSSOS
Jubilee Sports Ground (St Dunstan's Enterprises)	Sports Ground	POS/MOL **Proposed change to Policies Map** De-designation of approximately 0.40 ha MOL located at the northern tip of Jubilee Sports Ground
Kendale Rd Allotments	Allotments and Community Gardens	UGSSOS
Knapmill Road Housing Green (North West)	Formal Amenity Greenspace	SOS
Knapmill Road Housing Green (North West)	Formal Amenity Greenspace	SOS
Kirkdale Green	Parks and Gardens	POSSOS
Knapmill Way Allotments	Allotments and Community Gardens	UGSSOS
Knapmill Way Housing Green	Formal Amenity Greenspace	SOS
Laban	Formal Amenity Greenspace	SOS
Ladywell Fields * including Nature Reserve	Parks and Gardens , Green Corrodor	MOL/SOSPOS/UGS/Green Grid
Ladywell Fields Railway Embankment	Green Corridor	SOS
Ladywell Lodge/Green	Formal Amenity GreenspacePark	POSSOS
Ladywell House Gardens	Formal Amenity Greenspace	SOS

Lammas Green	Formal Amenity Greenspace	SOS
Land at Beckenham Hill	Miscellaneous	MOL
Launcelot Rd, disused allotments	Allotments	UGS
Launcelot Road Housing Green	Formal Amenity Greenspace	SOS
Lee & District Land Club ~~r/o Baring Rd~~	Allotments and Community Gardens	MOL/SOS~~UGS~~
Leslie Silk, ~~Allotments~~, Overdown Rd (north)	Allotments and Community Gardens	SOS~~UGS~~
Lethbridge Close	Natural and Semi-natural Urban Greenspace	SOS
Lewisham Crematorium	Cemeteries, Churches and Disused Churchyards	MOL/SOS
Lewisham Park	Park	POS
Lewisham Railway Triangles	Green Corridor	SOS
Lewisham Station Railway Embankment	Green Corridor	SOS
Lewisham to Blackheath Railway	Green Corridor	SOS
Loampit Vale Railway Embankment	Green Corridor	SOS
Lock Chase Green	Formal Amenity Greenspace	SOS
Long Meadow Allotments	Allotments and Community Gardens	MOL/SOS~~/UGS~~
Longton Nursery	Allotments and Community Gardens	SOS
Lower Pepys Park	Parks and Gardens	SOS
~~Longshore, Sites at~~	~~Amenity Greenspace~~	~~POS~~
~~Longton Nursery, Churchley Rd~~	~~Allotments~~	~~UGS~~
Luxmore Gardens	Parks and Gardens	SOS~~POS~~
Manor House Gardens	Parks and Gardens	MOL/SOS~~POS~~
Manor Park (Lewisham)	Parks and Gardens	SOS ~~POS~~
Margaret McMillan Park (Lewisham)	Parks and Gardens	SOS~~POS~~
Marvels Lane Housing Green	Formal Amenity Greenspace	SOS
Mary Ann Gardens	Parks and Gardens	SOS
Mayneswood Road Housing Green (South)	Formal Amenity Greenspace	SOS
Mayow Park	Parks and Gardens , ~~SINC~~	~~POS~~SOS
Meadow Close Allotments	Allotments and Community Gardens	~~UGS~~MOL/SOS
Merchant Taylors' Almshouses	Formal Amenity Greenspace	SOS
Merlin Gardens	Formal Amenity Greenspace	SOS
~~Midland Bank Sports Ground, Calmont Rd~~	~~Sports Ground~~	~~MOL/UGS~~

Milborough Crescent	Formal Amenity GreenspaceMiscellaneous - Amenity Greenspace	UGSSOS
Millwall Embankment	Green Corridor	SOS
Millwall Football Club Training Ground	Outdoor Sports Facilities	MOL/SOS
Molesworth Street Railway Embankment	Green Corridor	SOS
Moremead Road Housing Green	Formal Amenity Greenspace	SOS
Mountsfield Park	Parks and Gardens , SINC	MOL/SOSPOS **Proposed change to Policies Map** Open space status change to POS and MOL
New Cross Cutting	Green Corridor	MOL (part)/SOS
New Cross Gate Cutting Nature Reserve	Miscellaneous	UGSMOL/SOS
North New Cross Road Railway Embankment	Green Corridor	SOS
Northbrook Park	Park, Green Corridors and Gardens	MOL/POS/Green GridSOS
Northbrook Park Railway Cutting	Green Corridor	SOS
Oldstead Rd	Allotments	UGS
Oslac Rd	Miscellaneous - Amenity green/playspace	POS
Pepys Park including Nature Area	Park	POS
Pitfold Close Amenity Space	Miscellaneous – Amenity greenspace	UGS
Norther Road Amenity Green (North)	Formal Amenity Greenspace	SOS
Northover Road Amenity Green (South)	Formal Amenity Greenspace	SOS
Nunhead Cutting	Green Corridor	SOS
Nunhead East Railway Embankment	Green Corridor	SOS
Nyhead Street	Formal Amenity Greenspace	SOS
Oakridge Road Housing Green	Formal Amenity Greenspace	SOS
Oldstead Road Allotments (East)	Allotments and Community Gardens	SOS
Oldstead Road Green	Formal Amenity Greenspace	SOS
Overdown Road Housing Green	Formal Amenity Greenspace	SOS
Pepys Estate Green (East)	Formal Amenity Greenspace	SOS

Pepys Estate Green (West)	Formal Amenity Greenspace	SOS
Peter Pan's Park	Parks and Gardens	SOS
Peter Pan's Pool	Natural and Semi-natural Urban Greenspace	SOS
Pincott Place Railway Embankment	Green Corridor	SOS
Pitfold Gardens	Formal Amenity Greenspace	SOS
Playgreen Green Way Hosuing Green (East)	Formal Amenity Greenspace	SOS
Playgreen Way Housing Green (Centre East)	Formal Amenity Greenspace	SOS
Playgreen Way Housing Green (Centre West)	Formal Amenity Greenspace	SOS
Playgreen Way Housing Green (West)	Formal Amenity Greenspace	SOS
Pool River Linear Park	Parks and Gardens	MOL/SOS
Pool River Open Space Railway	Green Corridor	SOS
Prendergast Girls' School fields	Outdoor Sports Facilities~~Sports Ground~~	~~UGS~~SOS
Prendergast Ladywell School	Outdoor Sports Facilities	SOS
Priestfield Rd	Allotments and Community Gardens	~~UGS~~SOS
~~Quaggy Gardens~~	~~Miscellaneous - Amenity Space~~	~~POS~~
~~Queen's Rd~~	~~Miscellaneous – Amenity Greenspace~~	~~UGS~~
~~Queenswood Rd Nature Reserve~~	~~Miscellaneous~~	~~UGS~~
Railway side Ladywell Fields North	Green Corridor	SOS
Rainsborough Ave/ Clement House	Park and Garden	SOS
Rainsborough Avenue Embankments	Natural and Semi-natural Urban Greenspace	SOS
Randlesdown Road Cutting	Green Corridor	SOS
Rangefield Road Housing Green - East	Formal Amenity Greenspace	SOS
Rangfield Road Housing Green	Formal Amenity Greenspace	SOS
Ravensbourne	Green Corridor	SOS
Ravensbourne Park Gardens	Parks and Gardens	~~POS~~SOS
Ravensbourne River	Green Corridor	MOL (part)/ SOS
Rear of 34 Exford Road	Formal Amenity Greenspace	MOL/SOS
Reigate Road Housing Green	Formal Amenity Greenspace	SOS
Reigate Rd Open Space	Natural and Semi-natural Urban Greenspace ~~Miscellaneous - Amenity Green Space~~	MOL/SOS~~POS~~

Ringway ~~Centre~~ Community Gardens	Natural and Semi-natural Urban Greenspace	SOS
River Quaggy - Hither Green	Green Corridor	SOS
River Quaggy - Lee Green	Green Corridor	SOS
River Quaggy - Lewisham	Green Corridor	SOS
River Quaggy - South of A20	Green Corridor	SOS
River Ravebbourne Southend	Green Corridor	SOS
River Ravensbourne by Brookmill Park	Green Corridor	SOS
Riverdale Sculpture Park	Parks and Gardens	MOL (part)/SOS
~~Riverview Pool Linear Walk/~~Riverview Walk~~/Waterlink Way~~	Parks and Gardens	MOL/~~POS/Green Grid~~SOS
Rocombe Crescent Triangle	Formal Amenity Greenspace	SOS
Romborough Gardens East	Allotments and Community Gardens	~~UGS~~SOS
Romborough Gardens Allotments West	Allotments and Community Gardens	SOS
Roseveare Road Green	Formal Amenity Greenspace	SOS
Rossett Way	Formal Amenity Greenspace	SOS
Roudtable Road Housing Green (North)	Formal Amenity Greenspace	SOS
Roundtable Road Housing Green (South)	Formal Amenity Greenspace	SOS
Royal Naval Place Stage 1	Allotments and Community Gardens	~~UGS~~SOS
Royal Naval Place Stage 2	Allotments and Community Gardens	~~UGS~~SOS
Rutland Walk Sports Club~~, Rutland Walk~~	Outdoor Sports Facilities ~~Sports Ground~~	MOL/~~UGS/Green Grid~~SOS
Saint Georges Square	Formal Amenity Greenspace	SOS
Sandpit Road Housing Green	Formal Amenity Greenspace	SOS
Sayes Court Park	Parks and Gardens	~~POS~~SOS
Sedgehill School	Miscellaneous - Amenity Open Space, Playing, Fields	MOL/UGS/Green Grid
Sedgehill Rd	Allotments	MOL/UGS/Green Grid
Sedgehill School	Outdoor Sports Facilities	MOL/SOS
Sedgehill School Sports Ground	Outdoor Sports Facilities	MOL/SOS
Shaw Rd	~~Miscellaneous – Amenity Green Space and SINC~~ Natural and Semi-natural Urban Greenspace	SOS~~POS~~
Silwood Triangle	Green Corridor	SOS

Slaithwaite Rd ~~Allotments~~	Allotments and Community Gardens	~~UGS~~SOS
Somerset Gardens	Formal Amenity Greenspace	SOS
South of Prendergast Ladywell School	Natural and semi natural greenspace	SOS
Southend Lane Housing Green	Formal Amenity Greenspace	SOS
Southend Park	Parks and Gardens	~~POS/Green Grid~~SOS
St Barnabas	Formal Amenity Greenspace	SOS
St Bartholomews Churchyard	Cemeteries, Churches and Disused Churchyards	SOS
St Dunstan's College Sports Ground ~~, Stanstead Rd~~	Outdoor Sports Facilities ~~Sports Grounds~~	~~UGS/Green Grid~~MOL/SOS
~~St Joseph's Academy Playing Fields~~	~~Sports Grounds~~	~~UGS~~ SOS
St John the Baptist Church	Formal Amenity Greenspace	SOS
St Mary's Churchyard~~, Lewisham High Street~~	Miscellaneous – Cemeteries and churchyards	MOL
St John's Cutting	Green Corridor	SOS
St Josephs Vale Strip	Green Corridor	SOS
St Margarets Churchyard	Cemeteries, Churches and Disused Churchyards	SOS
St Mary's Churchyard Lewisham	Cemeteries, Churches and Disused Churchyards	SOS
St Mary's Churchyard Lewisham	Cemeteries, Churches and Disused Churchyards	SOS
St Matthew's Academy Sports Ground	Outdoor Sports Facility	SOS
St Mildred's Allotments Railway Land	Green Corridor	SOS
St Mildred's Rd~~, Allotments~~	Allotments and Community Gardens	MOL/~~UGS~~SOS
St Mildred's Road Roughland	Green Corridor	MOL/SOS
St Norbert Green	Formal Amenity Greenspace ~~Park~~	~~POS~~SOS
~~St Norbert Rd~~	~~Allotments~~	~~UGS~~
St Paul's Churchyard, Deptford ~~and Children's Playground~~	~~Park~~ Cemeteries, Churches and Disused Churchyards	~~POS~~MOL/SOS
Stanley Street ~~Allotments~~	Allotments and Community Gardens	~~UGS~~SOS
~~Ringway Centre/Stratfield House Baring Rd~~	~~Miscellaneous – Amenity Space~~	~~MOL~~
Staunton Street Green	Parks and Gardens	SOS

Sue Godfrey Nature Park	Natural and Semi-natural Urban GreenspaceMiscellaneous – Green Open Space	POSSOS
Sundridge Railway Slides	Green Corridor	SOS
Surrey Canal	Green Corridor	SOS
Surrey Canal Linear Park	Parks and Gardens	SOS
Sydenham Cottages Nature Reserve	Natural and Semi-natural Urban Greenspace Miscellaneous	MOL/SOSPOS
Sydenham Gardens	Allotments and Community Gardens	SOS
Sydenham High School Field	Outdoor Sports Facilities	SOS
Sydenham Park Allotments	Allotments and Community Gardens	UGSSOS
Sydenham Park Cutting	Green Corridor	SOS
Sydenham Road Cutting	Green Corridor	SOS
Sydenham School Sports Pitch	Outdoor sports facilities	SOS
Sydenham Wells Park	Parks and Gardens	MOL/SOSPOS/Green Grid
Tarleton Gardens inc. Eliot Bank Hedge	Miscellaneous – Amenity Green Space Natural and Semi-natural Urban Greenspace	SOSUGS
Taylors Lane Allotments	Allotments and Community Gardens	UGSSOS
Telegraph Hill Park	Parks and Community Gardens	MOL/POS/Green GridSOS
Ten-Em-Bee Sports Club, Old Bromley Rd	Outdoor Sports Facilities Sports Grounds	MOL/SOSUGS
Thurbarn Rd	Miscellaneous – Amenity green/playspace	POS
Trewsbury Rd	Allotments and Community Gardens	SOS UGS
Tudor Livesey Memorial Hall Bowling Green	Outdoor Sports Facilities	SOS
Turnham Rd Green	Turnham Road GreenMiscellaneous – Amenity green space	UGSSOS
Upper Pepys Park	Parks and Gardens	SOS
Vesta Road Railway Cutting	Green Corridor	MOL/SOS
Vineries Nature Reserve	Natural and Semi-natural Greenspace	MOL/SOS
Weavers Estate Allotments, Engleheart Rd	Allotments and Community Gardens	UGSSOS
West of Broadway Fields	Green Corridor	SOS
West of SELCHP	Green Corridor	SOS
Westbourne Drive Park	Parks and Gardens	SOS
Whitefoot Recreation Ground	Sports Ground and Green Corridor	UGS

Wild Cat Wilderness Community Greenspace	Allotments and Community Gardens	MOL/SOS
Windlass Place	Allotments and Community Gardens	~~UGS~~SOS
Worsley Bridge	Green Corridor	SOS
Zampa Road Railway Embankment	Green Corridor	SOS
~~Woodland Walk Downham~~	~~Park~~	~~POS~~
~~Woodyates Rd and Pitfold Rd r/o~~	~~Miscellaneous - Amenity Green Space~~	~~UGS~~
~~Railway area between Friendly Street and St John's Vale~~	~~Green Corridor~~	
~~Railway areas between Elverson Rd and Bertrand Street, Elverson Rd and Granville Park and between Thurston Rd River Ravensbourne~~	~~Green Corridor~~	
~~Hither Green Station Railway Lands~~	~~Green Corridor~~	
~~Railway line areas between Oldfield Grove and south east corner of Bridgehouse Meadows~~	~~Green Corridor~~	
~~Railway line area between south western corner of Bridgehouse Meadows and White Post Street~~	~~Green Corridor~~	
~~Railway line area between Engate Street and Ennersdale Rd~~	~~Green Corridor~~	
~~Railway line area including Lee Station between Lee High Rd and borough boundary~~	~~Green Corridor~~	
~~Railway line area between Crofton Park and Ladywell Fields~~	~~Green Corridor~~	
~~Railway line area between Forest Hill and Sydenham not protected by SINC designations~~	~~Green Corridor~~	
~~Railway Area/Amblecote Meadows/Pullman Close~~	~~Green Corridor~~	
~~Railway area between south end of Cumberland Place and Baring Rd~~	~~Green Corridor~~	
~~Railway line areas between New Cross/New Cross Gate and Surrey Canal Rd~~	~~Green Corridor~~	

Schedule 8: Designated Sites of Importance for Nature Conservation

Table 21.3: Table showing Sites of Importance for Nature Conservation

Commented [SA823]: Factual updates

Sites of metropolitan importance	
Site name	~~Proposed changes to Policies Map~~
River Thames and tidal tributaries	
Blackheath and Greenwich Park	
Forest Hill to New Cross Gate Railway Cutting	
Beckenham Place Park (Local Nature Reserve)	~~**Site name**~~ ~~Changed from 'Beckenham Place Park'.~~ ~~**Boundary**~~ ~~Extended in south west corner~~
Hither Green to Grove Park	

Sites of borough importance	
Site name	~~Proposed changes to Policies Map~~
Brockley and Ladywell Cemeteries	
Hither Green Cemetery, Lewisham Crematorium and Reigate Rd Open Space	~~**Boundary**~~ ~~Extended along south east corner~~
Downham Woodland Walk (Local Nature Reserve)	~~**Boundary**~~ ~~Extended in southern corner~~
Pool River Linear Park	~~**Boundary**~~ ~~Extended in two areas along western boundary, with two small areas excluded along Fordmill Road~~
Hillcrest Estate Woodland	
~~Grove Park Nature Reserve~~	
Forster Memorial Park	~~**Boundary**~~ ~~Extended to include a small area along the southwest and southeast corner~~
Burnt Ash Pond (Local Nature Reserve)	~~**Site name**~~ ~~Changed from 'Burnt Ash Pond Nature Reserve'~~
Horniman Gardens, Horniman Railway Trail and Horniman Triangle	~~**Boundary**~~ ~~Extended along southwest corner~~
Durham Hill	~~**Boundary**~~ ~~Reconfigured along northern boundary~~
Dacres Wood Nature Reserve and Sydenham Park Railway Cutting (Local Nature Reserve)	~~**Site name**~~ ~~Changed from 'Dacres Wood Nature Reserve and Sydenham Park Railway Cutting'~~
Loat's Pit	
Grove Park Cemetery	
Sue Godfrey Nature Park (Local Nature Reserve)	~~**Site name**~~ ~~Changed from 'Sue Godfrey Nature Park'~~
Honor Oak Rd Covered Reservoir	
St Mary's Churchyard, Lewisham	
River Quaggy at Manor House Gardens	~~**Site name**~~ ~~Changed from 'Manor House Gardens'~~

Mayow Park	~~**Boundary**~~ ~~Extended along the southwest corner~~
Spring Brook at Downham Playing Fields	~~**Boundary**~~ ~~Extended along all existing boundaries~~
River Ravensbourne and Brookmill Park	
Senegal Railway Banks	
Railside Land: New Cross to St Johns Railsides	
Nunhead Cutting	
Brockley to St John's Railsides	
St Johns to Lewisham Railsides (St Johns Station)	~~**Boundary**~~ ~~Extended around station~~
Lewisham Railway Triangles	
Lewisham to Blackheath Railsides	~~**Boundary**~~ ~~Extended along north and southern boundary.~~
~~Hither Green Railsides (Hither Green Station)~~	
~~Hither Green Sidings~~	
Railsides South of Sydenham	
Lower Sydenham Station Meadow.	~~**Site name**~~ ~~Changed from 'Lower Sydenham Station Allotments'~~ ~~**Boundary**~~ ~~Extended at northern end~~
New Cross and New Cross Gate railsides	~~**Boundary**~~ ~~Extended to include railway sidings~~
Mountsfield Park	
Chinbrook Community Orchard and Allotments	
River Quaggy at Chinbrook Meadows	~~**Site name**~~ ~~Changed from 'Chinbrook Meadows'.~~
River Ravensbourne at Ladywell Fields	~~**Site name**~~ ~~Changed from 'Ladywell Fields'~~ ~~**SINC status**~~ ~~Upgraded from Local to Borough importance~~
River Quaggy and Manor Park	~~**Boundary**~~ ~~Extended along northern boundary and reduced along southern boundary~~ ~~**SINC status**~~ ~~Upgraded from Local to Borough importance~~
River Thames Tidal Creek at Creekside Education Centre	~~**Site name**~~ ~~Changes from 'Creekside Education Centre'~~ ~~**SINC status**~~ ~~Upgraded from Local to Borough importance~~
Bridgehouse Meadows Railsides	~~**Site name**~~

	~~Changed from 'Bridge House Meadows'~~ ~~**Boundary**~~ ~~Extended in the southwest corner and at eastern boundary~~ ~~**SINC status**~~ ~~Upgraded from Local to Borough importance~~
Ringway Community Gardens	

Sites of local importance	
Site name	~~Proposed changes to Policies Map~~
Brookmill Nature Reserve (Local Nature Reserve)	~~**Site name**~~ ~~Changed from 'Brookmill Nature Reserve'~~
Besson Street Community Garden	
Sydenham Cottages Nature Reserve	~~**Boundary**~~ ~~Extended at northern boundary and south west corner.~~
Folkestone Gardens	
Whitefoot Recreation Ground	
Queenswood Nature Reserve	~~**Boundary**~~ ~~Extended along northern boundary~~
Rainsborough Avenue Embankments	~~**Boundary**~~ ~~Boundary amended with a reduction in overall area~~
Sayes Court Park	
Iona Close Orchard	~~**Boundary**~~ ~~Amended to exclude an area along the western boundary~~
Sedgehill Allotments	
Brockley Hill Park	
Sydenham Wells Park	
Hilly Fields	
Eliot Bank Hedge and Tarleton Gardens	~~**Boundary**~~ ~~Extended along most boundaries~~
River Ravensbourne at Peter Pan's Garden & Southend Pond	~~**Site name**~~ ~~Changed form 'Southend Pond'~~ ~~**Boundary**~~ ~~Extended along northern boundary~~
Albion Millennium Green	
Pepys Park Nature Area	~~**Boundary**~~ ~~Extended in north-east corner~~
St Paul's Churchyard and Crossfield Street Open Space	~~**Boundary**~~ ~~Extended along northern boundary~~
Telegraph Hill Park	
Bromley Hill Cemetery	~~**Boundary**~~ ~~Extended in the northern corner.~~
Gilmore Rd Triangle	~~**Boundary**~~ ~~Extended at north northern boundary.~~

Schedule 910: Local Nature Reserves and Ecological Corridors

Site Name
Local Nature Reserve
Beckenham
Brookmill
Burnt Ash Pond
Dacres Wood
Downham Wood
Grove Park
Sue Godfrey Nature Reserve
Ecological Corridor
South Bermondsey to Sydenham, Lee and Grove Park Railway Lines
The River Thames - Deptford Creek – The River Ravensbourne
The Pool River – Catford to Southend Park and into Bromley
Nunhead to Blackheath

Schedule 10: Sites of geodiversity interest

Table 21.4 Table showing sites of geodiversity interest

Site type	Site name	Location
Regionally Important Geological Site	Beckenham Place Park	Bellingham
Locally Important Geological Site	Old Gravel Pit	Blackheath
Locally Important Geological Site	Buckthorne Cutting	Crofton Park

Schedule 11: Regeneration nodes, growth nodes and growth corridors

Commented [NE824]: Addition – added for clarification to aid policy implementation. These were set out in the spatial strategy and the spatial extent of these areas will be shown on the Policies Map.

Area type	Area name	Coverage
Regeneration node	Lewisham Major Centre	800m buffer around town centre boundary
Regeneration node	Catford Major Centre	800m buffer around town centre boundary
Regeneration node	Deptford District Centre	800m buffer around town centre boundary
Regeneration node	Bell Green Local Centre	400m buffer around the following site allocation boundaries: Former Bell Green Gas Holders, Bell Green Retail Park and Sainsbury's Bell Green
Growth node	Forest Hill District Centre	800m buffer around town centre boundary
Growth node	New Cross District Centre	800m buffer around town centre boundary

Growth node	Lee Green District Centre	800m buffer around town centre boundary
Growth node	Bellingham Local Centre	400m buffer around town centre boundary
Growth node	Grove Park Local Centre	400m buffer around town centre boundary
Growth node	Surrey Canal Triangle	Surrey Canal Mixed-use Employment Location Site Allocation Boundaries
Growth node	Evelyn Local Centre	400m buffer around town centre boundary and nearby site allocation boundaries
Growth Corridor	A2	Frontages along New Cross Rd
Growth Corridor	A20	Frontages along Lee High Rd
Growth Corridor	A21	Frontages along Lewisham High St, Rushey Green and Bromley Road
Growth Corridor	A205	Frontages London Rd, Devonshire Rd, Waldram Park Rd, Stanstead Rd, Catford Rd, Brownhill Rd and Westhorne Avenue
Growth Corridor	A212	Frontages along Sydenham Rd, Stanton Way and Southend Lane

Schedule 12: Tall Building Suitability Zones

COVERAGE	**MAXIMUM BUILDING HEIGHT (Storeys)**
North Deptford	
Surrey Canal Triangle Mixed-use Employment Location	45
Apollo Business Centre Locally Significant Industrial Site and Surrey Canal Road and Trundleys Road Locally Significant Industrial Site	25
Deptford Landings Mixed-Use Employment Location (previously known as Timberyards, Oxestalls Road)	35
Convoy's Wharf Mixed-Use Employment Location	48
Deptford Creekside	
Land overlooking Deptford Creek adjacent Laban Theatre and new development of Union Warf	30
Sun Wharf Mixed-Use Employment Location (including Network Rail)	20
Lewisham	
Conington Road brownfield site, Land at Conington Road and Lewisham Road, Thurston Road Bus Station and Lewisham Gateway	35
Lewisham Shopping Centre	25

Triangular site used as a depot adjacent to River Ravensbourne.	16
Church Grove self-build site	16
Catford	
Wickes and Halfords big box retail	20 at centre and 12 at periphery
Catford Shopping Centre and Milford Towers	20 storeys at centre, with 12 storeys in discreet locations subject to detailed testing.
Laurence House and Civic Centre with Rushey Green telephone exchange	12 storeys
Catford Retail Park	20 at centre, with 16 storeys in discreet locations subject to detailed testing.
New Cross and New Cross Gate	
Besson Street	12
Former Hatcham Works, 12 Goodwood Road and New Cross Road	15
Clifton Rise and Achilles Street	12 to 15
Amersham Vale parking lot and 'Metro New Cross'	12 to 15
Bellingham	
Ravensbourne Retail Park	10 to 12
Lee	
Sainsbury's Site and Leegate Shopping Centre	10 to 12
Bell Green / Lower Sydenham	
Southern corner of former Gas Works site, Bell Green Retail Park and Sainsbury's Bell Green	16
Worsley Bridge Road Locally Significant Industrial Site	12

Lewisham Local Plan

Proposed submission document – Regulation 19 stage

(Text only version of Part Three - Site Allocations)

Contents

Central Area 4

1 Lewisham Gateway 5
2 Lewisham Shopping Centre 9
3 Land at Engate Street 13
4 Conington Road 16
5 Land at Conington Road and Lewisham Road (Tesco) 19
6 Thurston Road Bus Station 22
7 Lewisham Retail Park, Loampit Vale 24
8 100-114 Loampit Vale 27
9 Silver Road and Axion House 29
10 House on the Hill at Slaithewaite Road 31
11 Church Grove Self-Build 33
12 Ladywell Play Tower 35
13 PLACE/Ladywell (former Ladywell Leisure Centre) 38
14 Driving Test Centre, Nightingale Grove 41
15 Land at Nightingale Grove and Maythorne Cottages 43
16 Land at Rushey Green and Bradgate Road (Aldi) 46
17 Catford Shopping Centre and Milford Towers 48
18 Catford Island 51
19 Laurence House and Civic Centre ..... 54~~54~~53
20 South Circular ..... 57~~57~~56
21 Wickes and Halfords, Catford Road ..... 59~~59~~58
22 Ravensbourne Retail Park ..... 62~~62~~61

North Area ..... 747~~47~~66

1 Convoys Wharf Mixed-Use Employment Location ..... 75~~75~~67
2 Deptford Landings Mixed-Use Employment Location (formerly known as Oxestalls Road) and Scott House ..... 80~~80~~72
3 Evelyn Court Locally Significant Industrial Site ..... 84~~84~~76
4 Neptune Wharf Mixed-Use Employment Location ..... 87~~87~~79
5 Surrey Canal Road and Trundleys Road Locally Significant Industrial Site ..... 90~~90~~82
6 Apollo Business Centre Locally Significant Industrial Site ..... 93~~93~~85
7 Silwood Street ..... 96~~96~~88
8 Bermondsey Dive Under ..... 98~~98~~90
9 Surrey Canal Triangle Mixed-Use Employment Location ..... 101~~101~~93
10 Besson Street, (Kender Triangle) ..... 105~~105~~97
11 Former Hatcham Works, New Cross Road ..... 108~~108~~100
12 Goodwood Road and New Cross Road ..... 112~~112~~103
13 Achilles Street ..... 115~~115~~106
14 Former Deptford Green School (Upper School Site) ..... 118~~118~~109
15 Albany Theatre ..... 120~~120~~111
16 Land north of Reginald Road and south of Frankham Street (former Tidemill School) ..... 123~~123~~114
17 Lower Creekside Locally Significant Industrial Site ..... 126~~126~~117
18 Sun Wharf Mixed-Use Employment Location (including Network Rail Arches) ..... 129~~129~~120
19 Creekside Village East, Thanet Wharf Mixed-Use Employment Location ..... 133~~133~~124

East Area ..... 138~~138~~127

1 Heathside and Lethbridge Estate ..... 139~~139~~~~128~~
2 Blackheath Hill Locally Significant Industrial Site ..... 142~~142~~~~131~~
3 Leegate Shopping Centre ..... 144~~144~~~~133~~
4 Sainsbury's Lee Green ..... 147~~147~~~~136~~
5 Land at Lee High Road and Lee Road ..... 150~~150~~~~139~~
6 Southbrook Mews ..... 152~~152~~~~141~~
7 Mayfields Hostel, Burnt Ash Hill ..... 154~~154~~~~143~~
8 Sainsbury Local and West of Grove Park Station ..... 156~~156~~~~145~~

South Area ..... 161~~161~~~~148~~

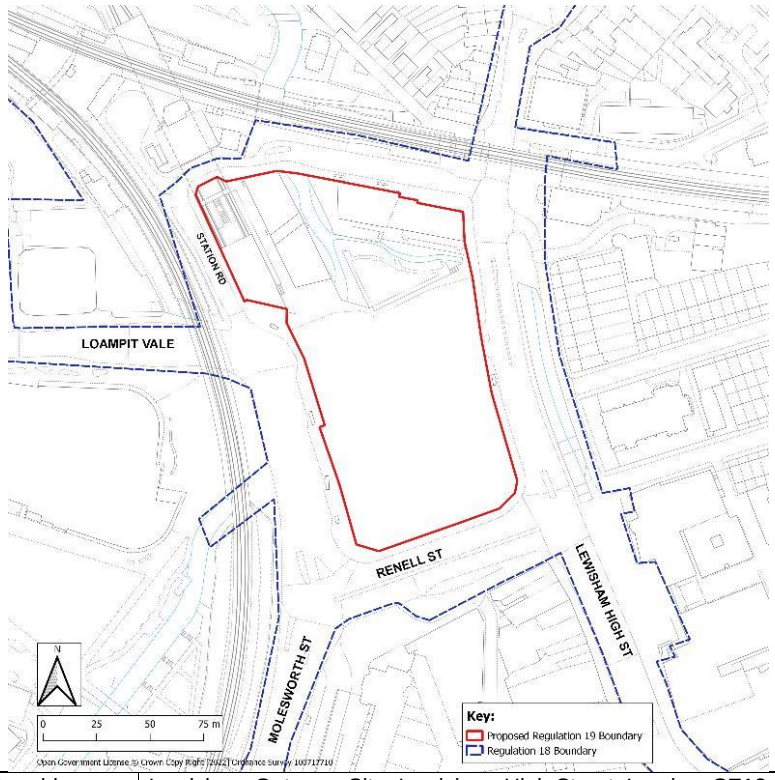
1 Former Bell Green Gas Holders and Livesey Memorial Hall ..... 162~~162~~~~149~~
2 Bell Green Retail Park ..... 165~~165~~~~152~~
3 Sainsbury's Bell Green ..... 168~~168~~~~155~~
4 Stanton Square Locally Significant Industrial Site ..... 171~~171~~~~158~~
5 Sydenham Green Group Practice ..... 174~~174~~~~161~~
6 Worsley Bridge Road Locally Significant Industrial Site ..... 176~~176~~~~163~~
7 Lidl, Southend Lane ..... 179~~179~~~~166~~
8 Land at Pool Court ..... 181~~181~~~~168~~
9 Catford Police Station ..... 183~~183~~~~170~~
10 Homebase/Argos, Bromley Road ..... 185~~185~~~~172~~
11 Beadles Garage ..... 188~~188~~~~175~~
12 Downham Co-op ..... 190~~190~~~~177~~
13 Excalibur Estate ..... 192~~192~~~~179~~
14 Bestway Cash and Carry ..... 195~~195~~~~182~~

West Area ..... 199~~199~~~~185~~

1 111-115 Endwell Road ..... 200~~200~~~~201~~
2 6 Mantle Road ..... 202~~202~~~~203~~
3 Jenner Health Centre ..... 204~~204~~~~205~~
4 Land at Forest Hill Station East (Waldram Place and Perry Vale) ..... 206~~206~~~~207~~
5 Land at Forest Hill Station West (Devonshire and Dartmouth Roads) ..... 208~~208~~~~209~~
6 Perry Vale Locally Significant Industrial Site ..... 211~~211~~~~212~~
7 Clyde Vale Locally Significant Industrial Site ..... 213~~213~~~~214~~
8 Featherstone Lodge, Eliot Bank ..... 215~~215~~~~216~~
9 Willow Way Locally Significant Industrial Site (LSIS) ..... 217~~217~~~~218~~
10 74 to 78 Sydenham Road ..... 220~~220~~~~221~~
11 Land at Sydenham Road and Loxley Close ..... 222~~222~~~~223~~
12 113-157 Sydenham Road ..... 224~~224~~~~225~~

Central Area

1 Lewisham Gateway



Site address:	Lewisham Gateway Site, Lewisham High Street, London, SE13
Site details:	**Site size (ha)**:~~5.41~~ 1.53, **Setting**: Central, **PTAL**: In 2015: 6b, In 2021: 6b, In 2031: 6b, **Ownershi**p: Mixed public and private **Current use**: Transport interchange
How site was identified:	Lewisham Core Strategy (2011) and London SHLAA (2017)
Planning designations and site considerations:	Opportunity Area,Regeneration Node, Appropriate Location for Tall Buildings, Area of Archaeological Priority, adjacent Conservation Area, adjacent Site of Importance for Nature Conservation, ~~Public Open Space,~~ Strategic Open Space, Waterlink Way, Air Quality Management Area , Air Quality Focus Area , Major Centre, Primary Shopping Area, Night-time Economy Hub, Flood Zones ~~2,3a,3b~~1,2,3, Rivers Ravensbourne and Quaggy on-site, Groundwater Source Protection Zone 1, Critical Drainage Area
Planning Status:	Full application DC/06/062375 granted in May 2009. Various reserved matters and s73 minor material amendment granted April 2013 – February 2019. Phase 1 is complete and has delivered 362 residential units and 1,089m^2 of main town centre floorspace. Phase 2 has s~~S~~tarted construction ~~and development is partially complete~~.

Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15	Beyond 15 years
	Yes			

Commented [SA1]: Factual update – boundary amended to exclude surrounding roads

Commented [HK2]: Factual update on designations

Commented [PP13]: Factual update – providing additional details on flood risk

Commented [PP14]: Factual update – on the progress made in redeveloping the site

Indicative development capacity: Remaining net units to be delivered:	Net residential units ~~1,057~~ 1011 649	Gross non-residential floorspace: Employment ~~17,500~~ 1,525 Main town centre ~~25,500~~ 9,548

Commented [SA5]: Capacities amended to reflect the planning consents granted for the site

Existing planning consent

DC/06/062375 - The comprehensive mixed use redevelopment of the Lewisham Gateway Site, SE13 (land between Rennell Street and Lewisham Railway Station) for 100000m² comprising retail (A1, A2, A3, A4 and A5), offices (B1), hotel (C1), residential (C3), education/health (D1) and leisure (D2) with parking and associated infrastructure, as well as open space and water features as follows:

- up to 57,000 m² residential (C3)
- up to 12,000 m² shops, financial & professional services (A1 & A2)
- up to 17,500 m² offices (B1) / education (D1)
- up to 5,000 m² leisure (D2)
- up to 4,000 m² restaurants & cafés and drinking establishments (A3 & A4)
- up to 3,000 m² hotel (C1)
- up to 1,000 m² hot food takeaways (A5)
- 500m² health (D1)
- provision of up to 500 car parking spaces
- revised road alignment of (part of) Lewisham High Street, Rennell Street, Molesworth Street and Loampit Vale and works to Lewisham Road.

DC/13/82493 - Approval of Reserved Matters for Block A.

DC/14/89233 - Approval of Reserved Matters for Block B.

DC/18/105218 - Approval of S73 minor material amendment increased the maximum residential floorspace to 77,326sqm (indicative c.889 units), together with up to 6,409sqm of co-living floorspace (indicative c.114 units). Of the 889 units, 362 have been delivered as part of Phases 1A and 1B, with 527 residential units remaining to come forward within Phase 2.

DC/18/109819 ~~– approval of Phase 2~~ Approval of reserved matters application for Phase 2 to provide 530 residential units, 119 co-living units, 4,381m2 of Class A1/A3, 1,525m2 of B1 co-working floorspace, a cinema and a gym~~.~~.

Commented [SA6]: Factual updates – to reflect planning consents granted for the site.

Site allocation

Comprehensive mixed-use redevelopment comprising compatible main town centre, commercial, community and residential uses. New and improved transport infrastructure including road realignment, enhanced transport interchanges and walking routes and cycleways ~~routes~~. Public realm and environmental enhancements, including new public open space and river restoration.

Commented [SA7]: Amended for clarity

Opportunities

Lewisham Gateway is a prominent site within Lewisham M~~m~~ajor C~~c~~entre. Its comprehensive redevelopment is necessary to facilitate the delivery of strategic transport infrastructure including the Lewisham interchange and the Bakerloo Line extension~~.~~. Redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the long-term vitality and viability of the town centre, and help it to achieve M~~m~~etropolitan C~~c~~entre status. Development will also enable public realm and environmental improvements, with key opportunities to reinstate the Rivers Quaggy and

Ravensbourne and to create a more coherent network of ~~pedestrian~~ walking routes and cycleways ~~routes~~ connecting to the surrounding area.

Commented [SA8]: Amended for clarity

Development requirements

1. Development must improve access to and permeability across the wider town centre area. This includes continued improvements to provide a legible and safe network of walking routes and cycleways ~~routes~~ to create a direct link between the station and town centre, as well as enhanced connections between public spaces and surrounding neighbourhoods.

Commented [SA9]: Respond to consultation – request for continued improvements to be made.

2. Applicants must work in partnership with Transport for London to deliver the road realignment, encompassing parts of Lewisham High Street, Rennell Street, Molesworth Street and Loampit Vale.

3. Development must not prejudice the delivery of transport infrastructure. Proposals will be required to safeguard land necessary to secure the delivery of enhancements to the station interchange in order to improve passenger movement and connections between buses, trains, the Docklands Light Rail, and the future Bakerloo line extension.

~~Appropriate provision for the bus layover, currently sited at Thurston Road.~~

Commented [SA10]: Repetition – removed as a new site allocation providing for a bus station at Thurston Road has been included in the Plan.

4. Positive frontages along main roads and key routes, with active ground floor frontages.

5. Delivery of new and improved public realm and open space in accordance with a site-wide public realm strategy, including:

    a. 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, taking into account the River Corridor Improvement Plan SPD;

    b. A central landscaped open space that celebrates the confluence of the rivers Quaggy and Ravensbourne.

Commented [SA11]: Amended for clarity and to aid policy implementation

Development guidelines

1. The design of development should set out and reinforce a clear hierarchy of streets and building heights, both within the site and in response to the wider town centre area, organised around a high quality public realm.

2. 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.

3. High quality public realm must be fully integrated into the site area. Particular attention should be given to key ~~pedestrian locations~~walking routes, including the connections between the station interchange and High Street to the south, linking Lewisham Gateway to the heart of the town centre. Proposals should also be designed having regard to their relationship with adjoining ~~strategic~~ sites, including those at Loampit Vale to the east and Conington Road to the north.

Commented [SA12]: Amended for clarity

4. The Rivers Quaggy and Ravensbourne pass through the site but are culverted and canalised. Proposals will be expected to investigate and maximise opportunities to reinstate the rivers and their corridors as a prominent feature in the development, along with facilitating improvements to Waterlink Way. This should be supported by delivery of a new coherent public open space which focuses on the confluence of the rivers.

~~4.~~5. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

~~5.~~6. Applicants should work in partnership with Thames Water. Given the adjacent watercourse, surface water should not be discharged to the public network.

~~6.~~7. Development must respond positively to the St Stephen's and Belmont Conservation Areas, and the St Stephen's Church (Grade II). Clear visual links to the church, situated to the east of the site boundary, should be established and maintained.

~~7. Transport for London proposals for the extension of the Bakerloo Line provide for the possibility of infrastructure requirements at this site, including a new 'station box', being located partly on the existing bus layover site at Thurston Road. Applicants must consult with Transport for London and Network Rail to ensure development makes appropriate provision for transport~~ infrastructure~~.~~

~~Car parking provision should be the minimum required to maintain the viability of the town centre, whilst also reflecting the high level of public transport accessibility of the site.~~

Commented [SA13]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA14]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

Commented [SA15]: Repetition – removed as a new site allocation providing for a bus station at Thurston Road has been included in the Plan.

Commented [SA16]: Repetition - removed to ensure clarity in policy implementation - Car parking standards are set out in Policy TR4

2 Lewisham Shopping Centre

Site address:	Lewisham Shopping Centre, 33A Molesworth Street, Lewisham, London, SE13 7HB			
Site details:	Site size (ha): 6.38, Setting: Central, PTAL: In 2015: 6b, In 2021: 6b, In 2031: 6b, Ownership: Private, Current use: Main town centre uses, Retail			
How site was identified:	Lewisham Call for Sites (2015 and 2018) and London SHLAA (2017)			
Planning designations and site considerations:	Opportunity Area, Regeneration Node, Appropriate Location for Tall Buildings, Archaeological Priority Area, Air Quality Management Area, Air Quality Focus Area, Major Centre, Primary Shopping Area, Night-time Economy Hub, Flood Zones ~~2, 3a, 3b~~1,2, 3, River Quaggy nearby, Groundwater Protection Zone 1, Critical Drainage Area, 3 Locally Listed Buildings on site			
Planning Status:	~~None~~Pre-application			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10 Yes	Years 11-15 Yes	Beyond 15 years
Indicative development capacity:	Net residential units: 1,579		Gross non-residential floorspace: Employment 20,097 Main town centre 60,291	

Commented [SA17]: Factual update on designations

Commented [SA18]: Factual update – providing additional details on flood risk

Commented [SA19]: Factual update – on the progress made in redeveloping the site

Commented [SA20]: Capacities remain the same as Regulation 18 plan

Existing planning consent

DC/17/105087 – part of the site, unimplemented prior approval for the change of use of Lewisham House, 25 Molesworth Street, SE13, from office use (Class B1a) to residential (Class C3) to create 237 units.

DC/21/120369 - part of the site, prior approval for the change of use of Lewisham House, 25 Molesworth Street, SE13, from office use (Class B1a) to residential (Class C3) to create 218 units. It was determined in May 2021 as Approval Required and the full application has yet to be submitted.

Commented [SA21]: Factual update – to reflect that planning consent has been granted for part of the site

Site allocation

Comprehensive mixed-use redevelopment comprising compatible main town centre, commercial, community and residential uses. Redevelopment of existing buildings and reconfiguration of spaces to facilitate a street-based layout with new and improved routes, both into and through the site, along with public realm and environmental enhancements.

Opportunities

This site forms the heart of Lewisham major centre and includes the Lewisham Market. It is dominated by the shopping centre, built in the 1970s, and the Lewisham House office block. Comprehensive redevelopment ~~Renewal and modernisation~~ of the shopping centre, alongside the delivery of a significant amount of new housing on upper floors will enhance the quality of town centre and help it to achieve ~~metropolitan~~ Metropolitan centre status. ~~Comprehensive redevelopment of the site can deliver a significant amount of new housing together with~~Redevelopment will provide opportunities to deliver modern retail and employment space, leisure, cultural and community facilities, to support the long-term vitality and viability of the town centre. Development can also enable transformative public realm enhancements to improve connections throughout the wider town centre area, and secure the long-term future of the market.

Commented [SA22]: Respond to consultation – landowner request to amend the wording of the Opportunities text

Development requirements

1. Landowners must work in partnership and in accordance with a masterplan, to ensure the appropriate co-ordination, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development).

Commented [SA23]: Respond to consultation – landowner request that a masterplan approach is used.

~~1.~~2. The site must be re-integrated with the surrounding street network to improve access and permeability into and through the town centre, with enhanced walking and cycle connections. This will require significant reconfiguration and re-orientation of the existing buildings and spaces to achieve a hierarchy of routes with clearly articulated east-west and north-south corridors together with a high quality market area.

~~2.~~3. Development must be designed to improve connections through the site including the creation of new east-west connections between Molesworth Street and Lewis Grove, along with a new north-south pedestrianised spine running through the site, linking the Lewisham Gateway site from Rennall Street at the north to Lewisham High Street / Molesworth Street at the south.

~~3.~~4. Positive frontages within the Primary Shopping Area and along key routes, with active ground floor frontages.

~~4.~~5. Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including:

a. Improvements to Lewisham High Street and Market square.

b. A central landscaped open space

c. A network of connections linking to the wider town centre area, including Cornmill Gardens, the Rivers Quaggy and Ravensbourne, and Blackheath, taking into account the River Corridor Improvement Plan SPD.

~~5.~~6. Protect and enhance Lewisham market.

~~6.~~7. Provision of dedicated public toilets appropriate to the scale of development.

Development guidelines

1. Positive and active ground floor frontages should be an integral element of the development design. They should be accommodated adjacent to Lewis Grove and along the new north-south route through the site from Lewisham Gateway, including the junction with Molesworth Street to the south, as well as along Rennell Street and Molesworth Street.

2. A range of design treatments should be integrated along key routes to help activate frontages and create visual interest, including high quality shopfronts, building entrances and windows at the street level. Breaks should also be provided along the length of routes by the introduction of footpaths and amenity spaces, along with the interspersing of smaller business units.

~~Car parking provision should be the minimum required to maintain the viability of the town centre, whilst also reflecting the high level of public transport accessibility.~~

3. High quality public realm must be fully integrated into the site area. Particular attention should be given to key pedestrian locations, including at the High Street, Market Square and Molesworth Street. Public realm should also help to enhance connections to the wider town centre area, including Cornmill Gardens, the Rivers Quaggy and Ravensbourne, and Blackheath.

4. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

5. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network. New connections into the Lewisham High Street trunk sewer will not be allowed.

~~3.~~6. The site's relationship with the Lewisham Market and Market Square should be one of the principal considerations in the development design.

~~4.~~7. The design of development must respond positively to a site's position in the wider site allocation area, and to the scale and function of the High Street. The southern end of the site should operate as a transitional zone with more moderately scaled development. Comprehensive redevelopment, including the Beatties Building and Model Market, should ~~establish a new southern anchor to~~ encourage visitors into the heart of the town centre, and help to support pedestrian movement up the length of the High Street. Tall~~er~~ building~~s~~ ~~elements~~ may be appropriate across the site, especially at the northern end of the site and to the west along Molesworth Street.

~~5.~~8. 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.

Commented [SA24]: Amended for clarity and to aid policy implementation

Commented [SA25]: Repetition - removed to ensure clarity in policy implementation - Car parking standards are set out in Policy TR4

Commented [SA26]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA27]: Respond to consultation – Thames Water request to provide text relating to water infrastructure

Commented [SA28]: Respond to consultation – landowner request to remove reference to a southern anchor.

Commented [SA29]: Respond to consultation – landowner request that other parts of the site may also be suitable for tall buildings.

9. Development must respond positively to heritage assets including: The Clock Tower, Lewisham High Street (Grade II); Church of St Saviour and St John Baptist and Evangelist (RC), Lewisham High Street (Grade II); Former Prudential Buildings, 187-197 Lewisham High Street (Grade II); and St Stephen's Conservation Area.

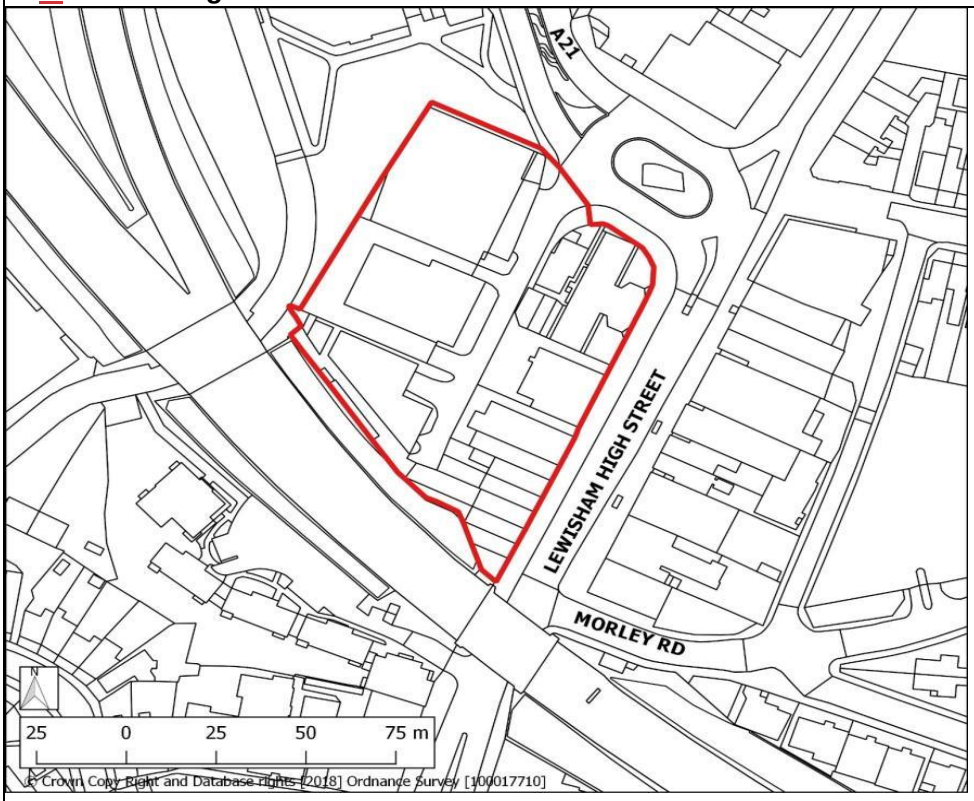
~~6.~~10. The eastern boundary of the St Stephen's Conservation Area runs along Lewisham High Street, opposite the northern portion of the site. Proposals must address impacts on the significance of this heritage asset and its setting, including the impact on views from within the Conservation Area.

~~7.~~11. The Grade II Listed Clocktower should remain discernible and continue to function as a significant landmark and way finding feature.

12. Redevelopment o~~O~~ptions for the plots of land that do not fall within the ownership of the Lewisham Shopping Centre ~~Lewisham House block~~ should be explored, to better integrate ~~it~~ them into a comprehensive scheme for the wider site allocation.~~,~~ This includes retail units along Lewisham High Street, and the Lewisham House block ~~recognising~~ where the principle of land use has already been established through the prior approval process.

Commented [SA30]: Respond to consultation – landowner request for flexibility, so that the development potential of other plots of land outside the shopping centre can be explored.

4 3 Land at Engate Street



Site address:	Engate Street, Lewisham, London, SE13 7HA			
Site details:	Site size (ha):0.83, Setting: Central, PTAL: In 2015: 6b, In 2021: 6b, In 2031: 6b, Ownership: Mixed public and private, Current use: Main town centre uses, Retail, Commercial			
How site was identified:	London SHLAA (2017)			
Planning designations and site considerations:	Opportunity Area, Regeneration Node, Archaeological Priority Area, Air Quality Management Area, Air Quality Focus Area, Major Centre, Night-time Economy Hub, adjacent to Strategic Open Space, Bakerloo Safeguarding Direction ~~Metropolitan Open Land~~, adjacent Sites of Importance for Nature Conservation, Flood Zone 1, 2, 3, adjacent to River Ravensbourne, Groundwater Source Protection Zone 1, Critical Drainage Area, Locally Listed Buildings on site			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 ~~Yes~~	Beyond 15 years Yes
Indicative development capacity:	Net residential units: ~~193~~ 112		Gross non-residential floorspace: Employment 6642 Main town centre ~~0~~ –2013	

Commented [SA31]: Factual update on designations

Commented [SA32]: Factual update – providing additional details on flood risk

Commented [SA33]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Site allocation

Mixed-use redevelopment comprising compatible main town centre, commercial and residential uses. Public realm and environmental enhancements, including to the River Ravensbourne and public access to Waterlink Way.

Opportunities

This site occupies an important transitional position leading into the heart of Lewisham major centre from the south, with frontages along the western side of the High Street and locally listed villas. Redevelopment and site intensification will provide a more optimal use of land to support the long-term vitality and viability of the town centre. Redevelopment will also enable public realm and access improvements, particularly around the River Ravensbourne, enhancing the site's qualities as a gateway to the centre.

Commented [SA34]: Respond to consultation - request to reference locally listed heritage asset

Development requirements

1. Development must be delivered in accordance with the A21 Development Framework and taking into account the River Corridor Improvement Plan SPD.

Commented [SA35]: Amended for clarity and to aid policy implementation

~~1.~~2. Positive frontages along Lewisham High Street, with active ground floor frontages.

~~2.~~3. Development will be required to retain or re-provide the existing employment floorspace, currently situated to the west of Engate Street, and must not result in a net loss of industrial capacity.

~~3.~~4. Development must be designed to enhance the ecological quality and amenity value of the River Ravensbourne.

~~4.~~5. Delivery of new and improved public realm, in accordance with a site-wide public realm strategy including enhanced public access to Waterlink Way.

Development guidelines

1. The development design must respond to the site's position relative to the wider town centre area. The site should function as a transitional zone into the centre, with moderately scaled development stepping up from Lewisham High Street.
2. Development should enhance the continuity of the frontages along the High Street.
3. Site redevelopment presents an opportunity to improve legibility and access to Waterlink Way at the northern part of the site. Proposals should also investigate opportunities to introduce a new east-west link through the site from the High Street to Waterlink Way and the River Ravensbourne.
4. Development should improve opportunities for walking, cycling and other active travel modes, contributing to the A21 Healthy Streets Corridor. Development should not result in a reduction in existing footway or carriageway space.

Commented [SA36]: Respond to consultation – request to reference A21 Healthy Streets Corridor and no reduction in existing footway or carriageway space.

5. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

Commented [SA37]: Respond to consultation – Environment Agency request to provide text relating to flood risk

6. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network.

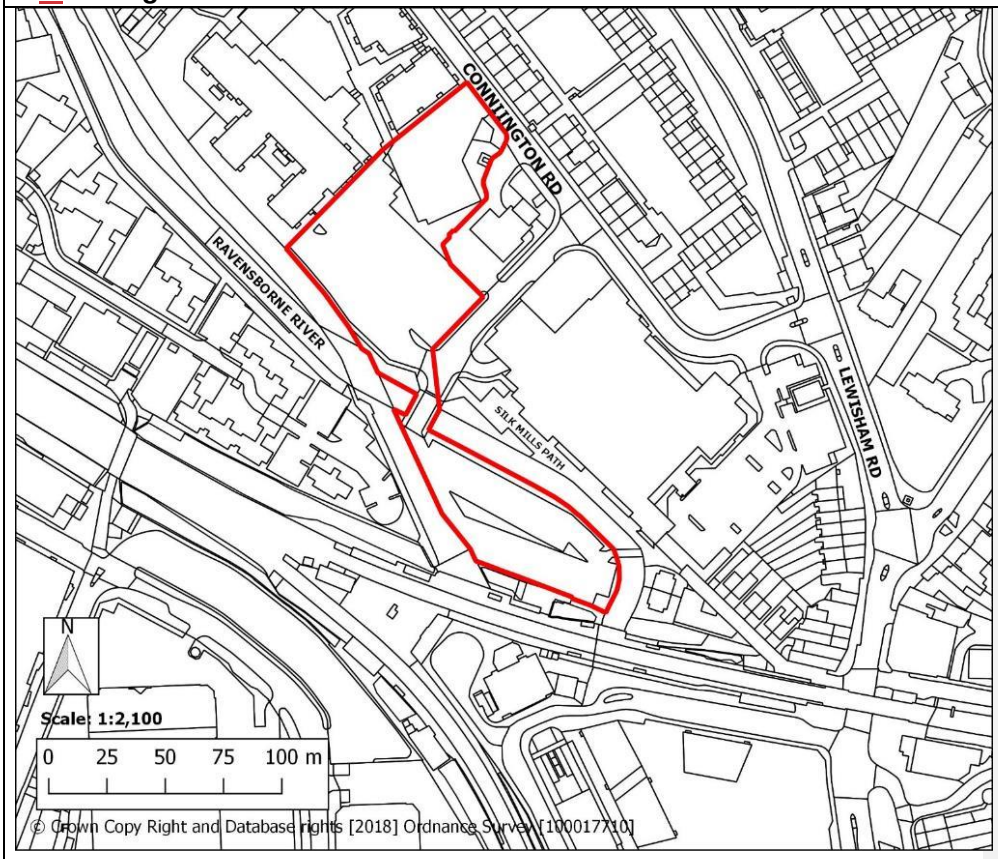
Commented [SA38]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

7. Proposals should be designed having regard to the Lewisham Shopping Centre site, to ensure continuity of the High Street and a coordinated approach to public realm.

8. Proposals should have regard for the locally listed villas and seek to enhance their setting.

Commented [SA39]: Respond to consultation - request to reference locally listed heritage asset

~~5~~ 4 Conington Road



Site address:	209 Lewisham Road, Lewisham, London, SE13 7PY			
Site details:	Site size (ha): 1.11, Setting: Central, PTAL: In 2015: 5-6b, In 2021: 5-6b, In 2031: 5-6b, Ownership: Private, Current use: Car park			
How site was identified:	Lewisham Town Centre Local Plan (2014), London SHLAA (2017) and Lewisham Call for Sites (2018)			
Planning designations and site considerations:	Opportunity Area, Regeneration Node, Appropriate Location for Tall Buildings, Area of Archaeological Priority, Air Quality Management Area, Air Quality Focus Area, Major Centre, Night-time Economy Hub, Flood Zones 1 ~~and 3b~~, River Ravensbourne on-site, Groundwater Source Protection Zone 1, Adjacent to Strategic Open Space~~.~~			
Planning Status:	Full application DC/18/109184 ~~refused by Mayor of London in March 2019~~~~Development~~ allowed at Appeal in January 2020 and S73 application granted in December 2021. ~~The site is now under~~Started construction~~.~~			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~367~~ 365		Gross non-residential floorspace: Employment 0 Main town centre ~~550~~ 554	

Commented [SA40]: Factual update on designations

Commented [SA41]: Factual update – on the progress made in redeveloping the site

Commented [SA42]: Capacities amended to reflect the planning consent granted for the site

Existing planning consent

DC/17/101621 – full application to provide 365 residential dwellings and 554m2 of commercial/community/office/leisure space was refused.

APP/C5690 - Appeal allowed in January 2020.

DC/21/121768 – S73 application for changes to the residential mix and changes to storey heights ~~granted in December~~ 2021.

Commented [SA43]: Factual updates – to reflect planning consents granted for the site.

Site allocation

Comprehensive mixed-use redevelopment with compatible main town centre, commercial and residential uses. Public realm and environmental enhancements including new public open space, improved walking and cycle routes, and river restoration.

Opportunities

This site occupies an important transitional position from the surrounding residential area leading into the heart of Lewisham major centre from the north, adjacent to the Lewisham interchange. The River Ravensbourne runs along and through the site. The site is currently dominated by a fragmented series of car parks. Comprehensive redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the long-term vitality and viability of the town centre. Redevelopment will also enable river restoration works along with other public realm and environmental improvements, better connecting the site to its immediate surrounds and the interchange.

Development requirements

1. The site must be re-integrated with the surrounding street network to improve access and permeability into and through the town centre, with enhanced walking and cycle connections to the residential areas and public spaces. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors, centred on an improved Silk Mills Path.
2. Positive frontages with active ground floor frontages along key routes.
3. Delivery of new and improved public realm and open space in accordance with a site-wide public realm strategy, including:
    a. A new public square linked to Silk Mills Path;
    b. Direct links to Lewisham interchange;
    c. A new public square adjacent to Lewisham Station's northern entrance;
    d. River restoration and a riverside walk.
4. Development must be designed to improve to the ecological quality and amenity value of the River Ravensbourne, including a riverside walk incorporating the existing bridges, with an attractive and robust embankment, taking into account the River Corridor Improvement Plan SPD.

Commented [SA44]: Amended for clarity and to aid policy implementation

Development guidelines

1. Development should provide for a complementary mix of uses which support but do not detract from the vitality and viability of Lewisham town centre, particularly the Primary Shopping Area.
2. Development should ensure buildings are set back sufficiently to be able to provide high quality urban spaces with generous, functional and formal landscaped areas

Commented [SA45]: Respond to consultation - request to reference sufficient space to encourage cycling

forming the central part of an improved Silk Mills Path and the river corridor. Dissecting Silk Mills Path should be access from Lewisham Road and Conington Road, linking to the river and Lewisham interchange.

3. Development should respond positively 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 interchange and the Lewisham Gateway site.

4. Development should respond positively to the scale and grain of the existing historic fabric towards the southern end of the site, at Silk Mills Path and Lewisham Road.

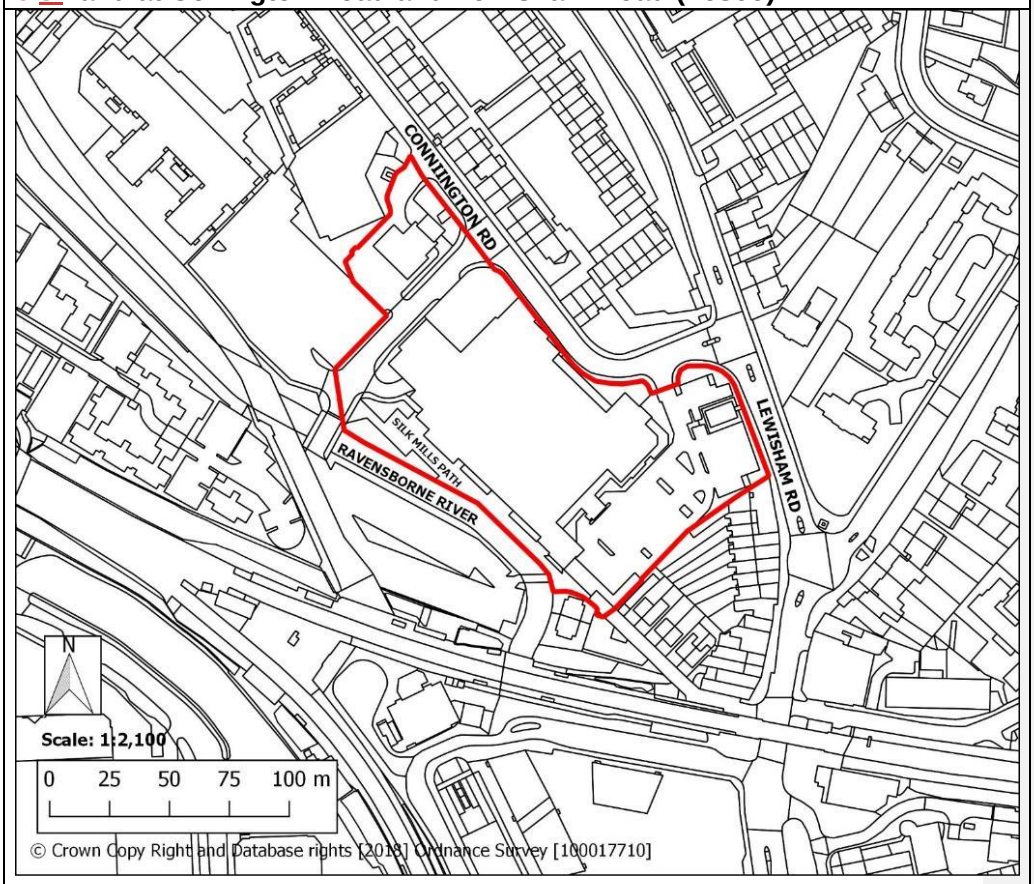
~~Car parking provision should be the minimum required, reflecting the high level of public transport accessibility of the site.~~

5. Applicants should work in partnership with Thames Water to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied. Given the adjacent watercourse, surface water should not be discharged to the public network. New connections into the trunk sewer running south to north through the site will not be allowed.

Commented [SA46]: Repetition - removed to ensure clarity in policy implementation - Car parking standards are set out in Policy TR4

Commented [SA47]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~6~~ 5 Land at Conington Road and Lewisham Road (Tesco)



Site address:	Tesco, 209 Lewisham Road, Lewisham, London, SE13 7PY
Site details:	Site size (ha): 1.53, Setting: Central, PTAL: In 2015: 5-6b, In 2021: 5-6b, In 2031: 5-6b, Ownership: Private, Current use: Main town centre uses, Retail, Car park
How site was identified:	Lewisham Town Centre Local Plan (2014), London SHLAA (2017) and Lewisham Call for Site (2018)
Planning designations and site considerations:	Opportunity Area, Regeneration Node, Appropriate Location for Tall Buildings, Adjacent to Strategic Open Space, Area of Archaeological Priority, Air Quality Management Area, Air Quality Focus Area, Major Centre, Night-time Economy Hub, Flood Zones 1, 2, ~~3 and 3a~~, River Ravensbourne on-site, Groundwater Source Protection Zone 1, Critical Drainage Area
Planning Status:	~~None~~Pre-application

Timeframe for delivery:	Years 1-5 Yes	Years 6-10 Yes	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~380~~ 407		Gross non-residential floorspace: Employment ~~3,802~~ 1,901 Main town centre 7,604	

Commented [SA48]: Factual update on designations

Commented [SA49]: Factual update – providing additional details on flood risk

Commented [SA50]: Factual update – on the progress made in redeveloping the site

Commented [SA51]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Site allocation

Comprehensive mixed-use redevelopment with compatible main town centre, commercial and residential uses. Public realm, access and environmental enhancements including new public open space, improved walking and cycle routes~~,~~ and along the river ~~restoration~~.

Commented [SA52]: Respond to consultation – removed as wording is misleading

Opportunities

This site occupies an important transitional position from the surrounding residential area leading into the heart of Lewisham major centre from the north. The River Ravensbourne runs along its western edge. The site is currently occupied by a large format retail building and car park. Comprehensive redevelopment and site intensification, along with the replacement of the existing retail store or introduction of a wider range of uses, will provide a more optimal use of land to support the long-term vitality and viability of the town centre. Redevelopment will also enable river restoration works along with other public realm and environmental improvements, better connecting the site to its immediate surrounds and the interchange.

Commented [SA53]: Respond to consultation – landowner request that reference is made to the replacement of the existing retail store

Development requirements

1. The site must be re-integrated with the surrounding street network to improve access and permeability into and through the town centre, with enhanced walking and cycle connections to residential areas and public spaces. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors, centred on an improved Silk Mills Path.
2. Positive frontage with active ground floor frontages along key routes.
3. Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including:
    a. A new public square linked to Silk Mills Path;
    b. River restoration and a riverside walk
4. Development must be designed to improve to the ecological quality and amenity value of the River Ravensbourne, including a riverside walk incorporating the existing bridges with an attractive and robust embankment, taking into account the River Corridor Improvement Plan SPD.

Commented [SA54]: Amended for clarity and to aid policy implementation

Development guidelines

1. Development should provide for a complementary mix of uses which support but do not detract from the vitality and viability of Lewisham town centre, particularly the Primary Shopping Area.
2. The site should function as a transitional site, both in terms of land use and visual amenity, from the surrounding low-rise residential neighbourhoods into the transport interchange, Lewisham Gateway and the heart of the town centre. The design of development must step down and respond positively to the residential properties at the site's eastern side, at Conington Road and beyond.

Commented [SA55]: Factual update – to reflect current character surrounding the site

3. ~~New d~~Development should ensure buildings are set back sufficiently to be able to provide high quality urban spaces with generous, functional and formal landscaped areas forming the central part of an improved Silk Mills Path and the river corridor. Dissecting Silk Mills Path should be access from Lewisham Road and Conington Road, linking to the river and Lewisham interchange.

Commented [SA56]: Respond to consultation – request to reference sufficient space to encourage cycling

4. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

5. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network. New connections into the trunk sewer running south to north through the site will not be allowed.

~~3.~~6. Development should respond positively 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.

~~4.~~7. Development should respond positively to the scale and grain of the existing historic fabric towards the southern end of the site, at Silk Mills Path and Lewisham Road.

~~Car parking provision should be the minimum required, reflecting the high level of public transport accessibility of the site.~~

8. Development should respond positively to Eagle House, which sits on the site's eastern edge fronting Lewisham Road. This building was constructed in approximately 1870 and is one of the original Anchor Brewery Buildings. It is of architectural and local significance.

9. Development should allow for the retention and/or re-provision of the bus stop and stand facility that are currently provided on this site.

Commented [SA57]: Respond to consultation – Environment Agency request to provide text relating to flood risk

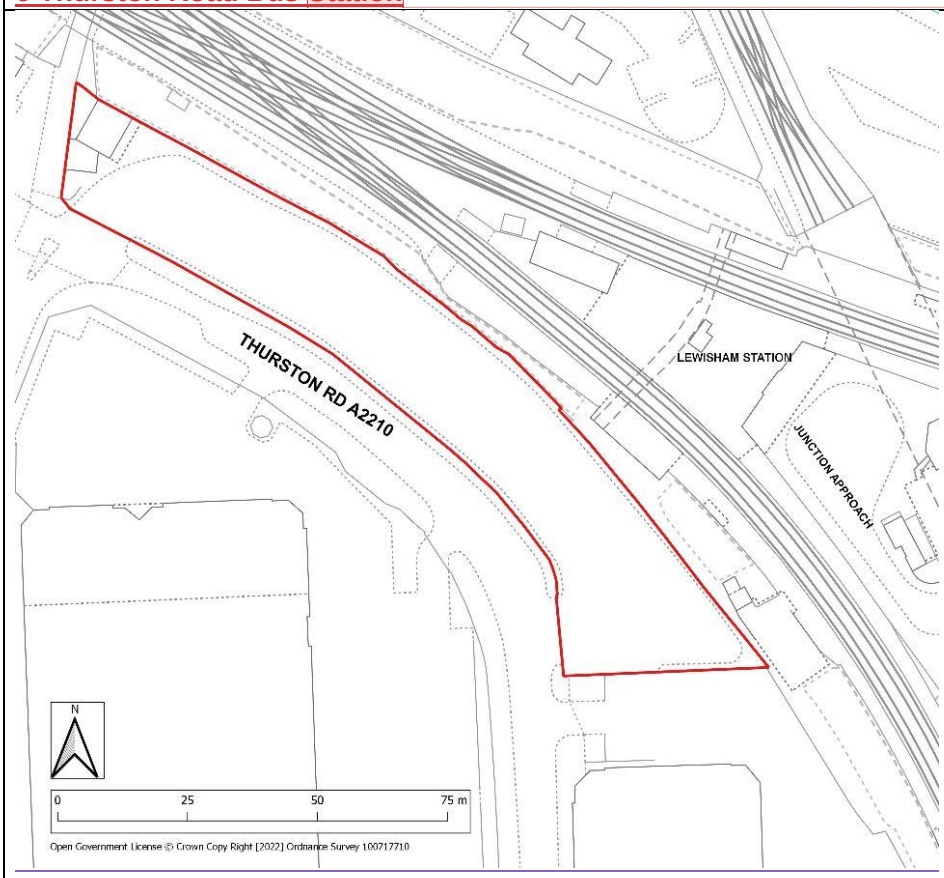
Commented [SA58]: Respond to consultation - Thames Water request to provide text relating to water infrastructure

Commented [SA59]: Repetition - removed to ensure clarity in policy implementation - Car parking standards are set out in Policy TR4

Commented [SA60]: Respond to consultation – landowner and TFL request reference to the retention or re-provision of the bus stop

6 Thurston Road Bus Station

Commented [SA61]: New site allocation added



Site address:	Thurston Road, Lewisham, SE13
Site details:	Site size (ha): 0.35, Setting: Central, PTAL: In 2015: 6b, In 2021: 6b, In 2031: 6b, Ownership: Private, Current use: Bus station
How site was identified:	Strategic Planning Team (2022)
Planning designations and site considerations:	Opportunity Area, Regeneration Node, Bakerloo Line Safeguarding Direction, Appropriate Location for Tall Buildings, Adjacent to Site of Importance for Nature Conservation, Air Quality Management Area, Air Quality Focus Area, Major Centre, Night-time Economy Hub, Flood Zone 3a, Critical Drainage Area
Planning Status:	None

Commented [SA62]: Factual update on designations

Timeframe for delivery:	Years 1-5 Yes	Years 6-10 Yes	Years 11-15 Yes	Beyond 15 years Yes
Indicative development capacity:	Net residential units: 0		Gross non-residential floorspace: Employment 0 Main town centre 0	

Site allocation

Safeguarding for strategic transport infrastructure.

Opportunities

The site is located within Lewisham major centre on Thurston Road, running along the southern edge of the railway line. It is currently used as a TFL bus station. Transport for London proposals for the extension of the Bakerloo Line provide for the possibility of infrastructure requirements at this site, including a new 'station box'. In March 2021 the Secretary of State issued a Safeguarding Direction for the BLE and this site has been identified as an area of surface interest, i.e. to be used as a temporary works site during the construction phase of the BLE. It may also be used as a temporary works site whilst making improvements to Lewisham Railway Station. In the longer term there will be an opportunity to re-provide the bus station.

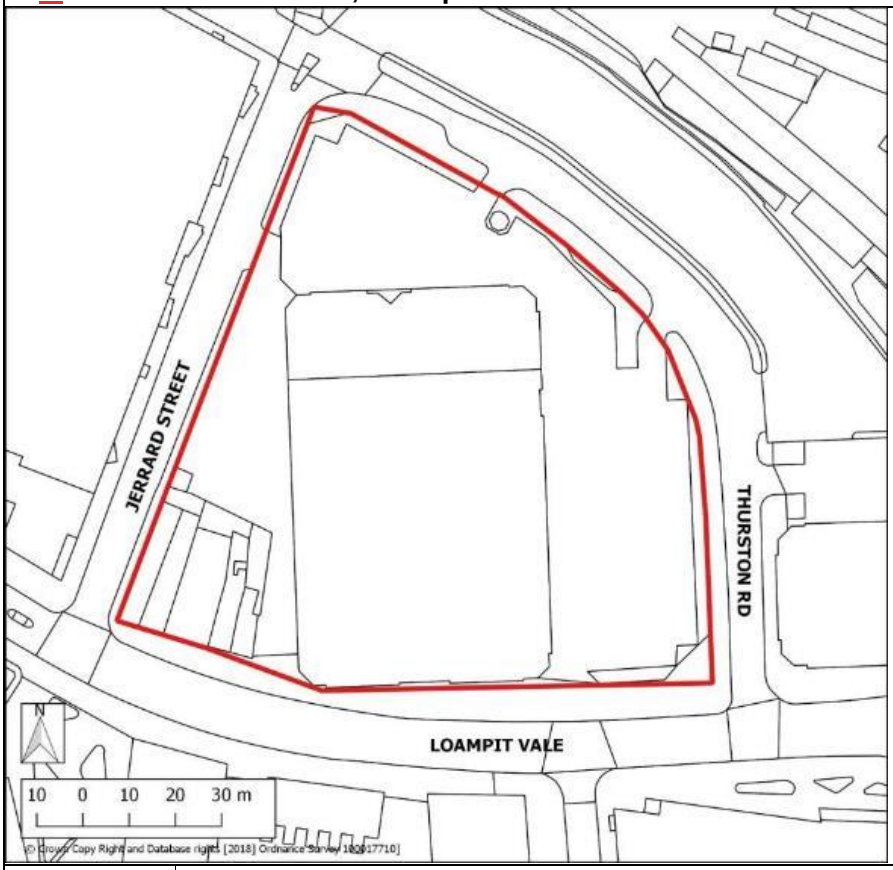
Development requirements

1. Applicants must consult with Transport for London and Network Rail to ensure this site makes appropriate provision for transport infrastructure and services.
2. The site is safeguarded as a temporary works site in order to deliver strategic transport infrastructure, including the BLE station box and improvements to Lewisham Railway Station.
3. The existing bus standing capacity and associated facilities must be temporarily re-located.
4. Once the site has stopped being used as a temporary works site, it must be returned to its original use as a bus station for TFL.

Development guidelines

1. The design of any station improvements and/or new BLE entrances should carefully consider TFL requirements regarding bus standing and associated facilities. The designs should, wherever possible minimise land take to ensure the site can be returned to its original use.
2. Any new station entrance should link into the provision made at Lewisham Exchange.

~~8~~ 7 Lewisham Retail Park, Loampit Vale



Site address:	Lewisham Retail Park and Nos. 66-76 Loampit Vale, Lewisham, SE13			
Site details:	Site size (ha): 1.13, Setting: Central, PTAL: In 2015: 6b, In 2021: 6b, In 2031: 6b, Ownership: Private, Current use: Main town centre uses, Retail			
How site was identified:	Lewisham Town Centre Local Plan (2014) and London SHLAA (2017)			
Planning designations and site considerations:	~~-~~Opportunity Area, Regeneration Node, Bakerloo Line Safeguarding Direction, Adjacent to Site of Importance for Nature Conservation, Adjacent to Strategic Open Space, Air Quality Management Area, Air Quality Focus Area, Major Centre, Night-time Economy Hub, Flood Zone ~~3a~~2, 3, Groundwater Source Protection Zone 1, Critical Drainage Area			
Planning Status:	Full application DC/16/097629 granted in March 2019.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10 Yes	Years 11-15	Beyond 15 Years
Indicative development capacity:	Net residential units: ~~536~~ 529		Gross non-residential floorspace: Employment ~~2,171~~ 0 Main town centre ~~2,171~~ 4343	

Commented [SA63]: Factual update on designations

Commented [SA64]: Factual update – providing additional details on flood risk

Commented [SA65]: Capacities amended to reflect the planning consent granted for the site

Existing planning consent

DC/16/097629 - Comprehensive redevelopment of the Lewisham Retail Park and Nos. 66 – 76 Loampit Vale including the demolition of all buildings on site to facilitate the provision of 4,343sqm of non-residential floorspace comprising (A1) Shops, (A2) Financial & Professional Services, (A3) Restaurants & Cafés, (B1) Business, (D1) Non-Residential Institutions and (D2) Assembly & Leisure uses and 536 residential units in buildings ranging from 4 – 24 storeys in height with private and communal open spaces, on-site energy centre, car and cycle parking, and associated landscaping and public realm works.

Site allocation

~~Comprehensive~~ ~~m~~Mixed-use redevelopment with compatible main town centre, commercial and residential uses. Public realm enhancements, including a boulevard along Loampit Vale, with improved walking and cycle routes connecting to Lewisham interchange.

Commented [SA66]: Respond to consultation – landowner request that flexibility is introduced.

Opportunities

The site is located within Lewisham major centre on Loampit Vale, a main approach to the heart of the town centre from the west. The site is currently occupied by a warehouse with large format retail units and a car park, a community artist-led studio and project space along with a small terrace of seven properties. ~~Comprehensive r~~Redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the long-term vitality and viability of the town centre. Redevelopment will also enable public realm and access improvements, better connecting the site to its immediate surrounds as well as enhancing access to Lewisham interchange.

Commented [SA67]: Factual update – to acknowledge the current uses on the site.

Development requirements

1. Landowners must work in partnership and in accordance with a masterplan, to ensure the appropriate co-ordination, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development)~~.~~.

Commented [SA68]: Respond to consultation – landowner request that flexibility is introduced by using a masterplan approach.

~~1.~~2. Development must not prejudice the delivery of transport infrastructure, including the Bakerloo Line extension.

~~2.~~3. The site must be re-integrated with the surrounding street network to improve access and permeability into and through the town centre, with enhanced connections to Lewisham interchange. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors, including walking and cycle friendly boulevards along Loampit Vale, Jerrard Street and Thurston Road.

~~3.~~4. Positive frontages with active ground floor frontages along key routes.

~~4.~~5. Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including a new station square.

Development guidelines

1. The design of development should respond positively to the importance of Loampit Vale as a major route, and provide an appropriate transition in bulk, scale and massing, towards Lewisham Gateway.

2. Development should set out and reinforce a clear hierarchy of streets and building heights, both within the site and in response to the wider town centre area. A landmark or way finding building signalling the entrance to Lewisham town centre from Loampit Vale to the west may be acceptable.

3. Tree lined pavements of a generous width, indicatively a minimum 6 metres, should define boulevards at Loampit Vale and Thurston Road with buildings set back at an appropriate distance.

~~3.~~ 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.

4. Development should be designed having regard to the ~~Carpetright~~ Lewisham Exchange site to ensure continuity of the boulevards along Loampit Vale and Thurston Road, and a coordinated approach to public realm and access. This includes provision of a new 'station square' to create a coherent public space and visual link between the sites.

5. Transport for London proposals for the extension of the Bakerloo line through Lewisham town centre could have an impact on the redevelopment potential of both the Lewisham Retail Park and Carpetright sites. This is as a result of new tunnels running underneath and the possibility of a new 'station box' being located partly on the bus layover site (to the north of the Carpetright site), and across a portion of the northern part of the Carpetright site. The bus layover site has been identified as the preferred location for the proposed extension.

6. Building lines may need to be set back to accommodate a dedicated bus lane for turning from Loampit Vale into Jerrard Street and the resultant depth of pavement.

7. Consideration should be given to the proximity of the proposed 'bus layover' site (part of the Lewisham Gateway development) when planning for sensitive uses on adjacent sites.

8. Applicants should work in partnership with Thames Water to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable, allow access for maintenance and repair of sewers and ensure infrastructure upgrades are delivered ahead of the site being occupied. New connections into the trunk sewer will not be allowed.

Commented [SA69]: Respond to consultation – request to make reference to Healthy Streets corridor and no reduction in footway and carriageway space.

Commented [SA70]: Factual update – site is now called Lewisham Exchange

Commented [SA71]: Respond to consultation - Thames Water request to provide text relating to water infrastructure

~~17~~ 8 100-114 Loampit Vale

Site address:	100-114 Loampit Vale, Lewisham, London, SE13			
Site details:	Site size (ha):, 0.12, Setting: Central, PTAL: In 2015: 6b, In 2021: 6b, In 2031: 6b, Ownership: Private, Current use: Industrial, Car services			
How site was identified:	Lewisham Call for Sites (2018)			
Planning designations and site considerations:	~~-~~Opportunity Area, Regeneration Node, adjacent to Strategic Open Space, ~~-~~adjacent to Site of Importance for Nature Conservation, Air Quality Management Area, Flood Zone ~~1~~3, Groundwater Source Protection Zone 1, Critical Drainage Area			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 Yes	Beyond 15 years
Indicative development capacity:	Net residential units: ~~29~~ 30		Gross non-residential floorspace: Employment ~~984~~ 298 Main town centre ~~0~~ 596	

Commented [SA72]: Factual update on designations

Commented [SA73]: Factual update – providing additional details on flood risk

Commented [SA74]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Site allocation

Mixed-use redevelopment incorporating main town centre, commercial and residential uses.

Opportunities

The site is located at the edge of Lewisham major town centre and occupies a transitional position at Loampit Vale leading to the station interchange. The site is currently used for MOT services. Redevelopment and site intensification, along with introduction of more compatible main town centre uses, will provide a more optimal use of land to support the long-term vitality and viability of the town. Development will also deliver design and public realm improvements that better complement the neighbouring properties.

Development requirements

1. Positive frontages along Loampit Vale, with active ground floor frontages.
2. Development must respond to the site's transitional position at the edge of the town centre, and be designed to maintain and enhance the continuity of the building line to the west of the railway.
3. The maximum viable amount of employment floorspace must be re-provided, in line with Policy ~~EC7~~ EC8 (Non-designated employment sites).
~~3.~~4. Development proposals must protect and seek to enhance green infrastructure, including the SINC adjacent to the site.

Development guidelines

1. The replacement provision of employment floorspace should be ~~in the B1 use class, which is more~~ compatible with the neighbouring properties and the edge of centre location (previous B1 use class).
2. The site presents an opportunity for a moderately scaled development to act as a visual transition to the town centre where taller buildings are located. The new building line should be consistent with and enhance the townscape, positively responding to the terraces to the west of the railway.
3. Development may step up along Loampit Vale towards the railway embankment, where massing should be concentrated, particularly to minimise impact on the properties north and west.
4. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.
5. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable, allow access for maintenance and repair of sewers and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. New connections into the Bell Green trunk sewer will not be allowed.
~~3.~~6. Design should ensure that amenity of neighbouring properties, including the adjoining public house and gardens, is protected, in line with the Agent of Change principle.
~~4.~~7. Development will be expected to conserve and enhance the setting of the Tabernacle, at Algernon Road, which is a Grade II listed building. It is clearly visible from Loampit Hill and stands out as a local landmark, as helps to function as a wayfinder.
8. The presence of the railway embankment and viaduct will require buildings to be set away to the east of the site.

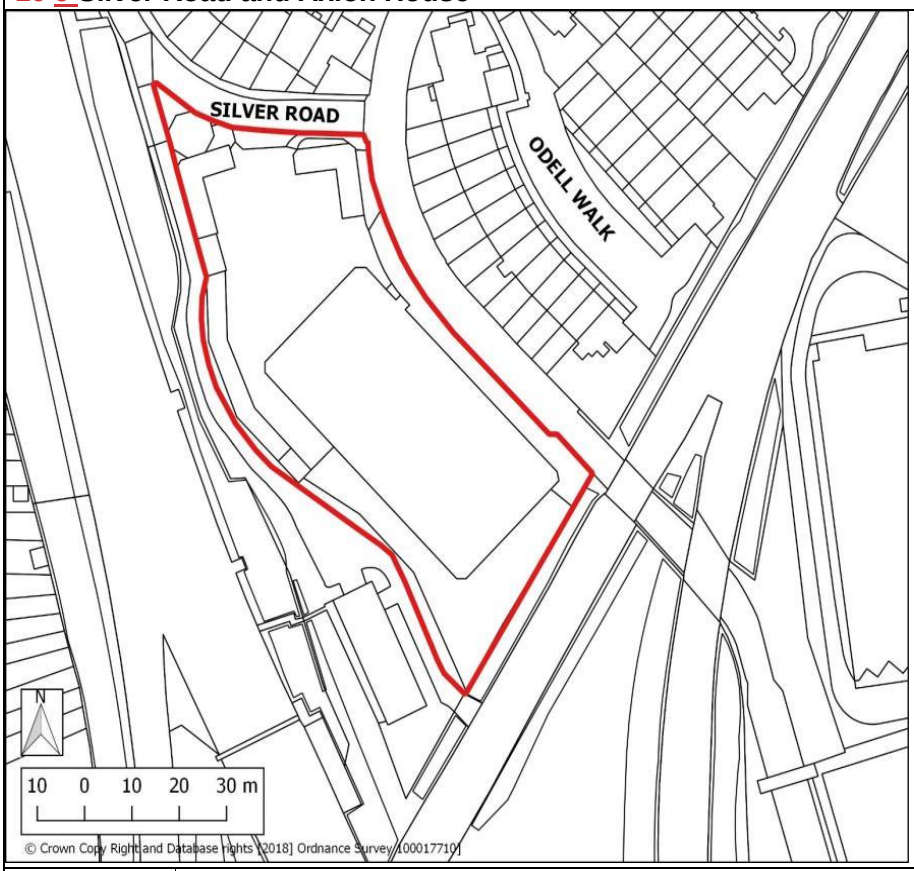
Commented [SA75]: Factual update – to reflect new policy numbers in Regulation 19 plan

Commented [SA76]: Factual update – to reflect change to Use Classes

Commented [SA77]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA78]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~10~~ 9 Silver Road and Axion House



Site address:	Axion House, 1 Silver Road, London, SE13 7BQ			
Site details:	Site size (ha): 0.48, Setting: Central, PTAL: In 2015: 1b, In 2021: 1b, In 2031: 1b, Ownership: Private, Current use: Industrial, Vacant land			
How site was identified:	London SHLAA (2017)			
Planning designations and site considerations:	Opportunity Area, Regeneration Node, Appropriate Location for Tall Buildings, adjacent to Strategic Open Space, Archaeological Priority Area, adjacent Site of Importance for Nature Conservation, Air Quality Management Area, Air Quality Focus Area, Flood Zones ~~2, 3a, 3b~~2, 3, adjacent to River Ravensbourne, Groundwater Source Protection Zone 1, Critical Drainage Area			
Planning Status:	~~Application submitted (~~DC/18/109972~~) pending decision.~~ granted in May 2020. Started construction.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~136~~ 141		Gross non-residential floorspace: Employment ~~370~~ 0 Main town centre ~~370~~ 453	

Commented [SA79]: Factual update on designations

Commented [SA80]: Factual update – providing additional details on flood risk

Commented [SA81]: Factual update – on the progress made in redeveloping the site

Commented [SA82]: Capacities amended to reflect the planning consent granted for the site

Existing planning consent

DC/18/109972 – Demolition of existing buildings (Axion House) and the construction of buildings to provide 141 residential units and 453m^2 of flexible B1/A1/A3/D2 commercial uses.

Commented [SA83]: Factual update – to reflect the planning consent granted for the site

Site allocation

Employment-led mixed-use redevelopment comprising compatible commercial and residential uses. Public realm enhancements including public access and landscaping along the River Ravensbourne.

Opportunities

The site comprises non-designated employment land located within a predominantly residential area in Lewisham major centre, next to the River Ravensbourne. There are several older commercial units on the site, including a large two-storey warehouse building. Redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the long-term vitality and viability of the town centre, including provision of modern workspace. Redevelopment will also enable public realm- enhancements that maximise the amenity provided by the River Ravensbourne.

Development requirements

1. The maximum viable amount of employment floorspace must be re-provided, in line with Policy ~~EC7~~ EC8 (Non-designated employment sites).

Commented [SA84]: Factual update - to reflect new policy numbers in Regulation 19 plan

2. Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including public access to and landscaping along the river, taking into account the River Corridor Improvement Plan SPD.

Commented [SA85]: Amended for clarity and to aid policy implementation

Development guidelines

1. Development should respond positively to the River Ravensbourne and be designed to enhance its amenity value, with walking connections and views through the site to the river, and landscaped public realm alongside it.

2. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

Commented [SA86]: Respond to consultation – Environment Agency request to provide text relating to flood risk

3. Applicants should work in partnership with Thames Water to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied. Given the adjacent watercourse, surface water should not be discharged to the public network. New connections into the Ravensbourne trunk sewer will not be allowed.

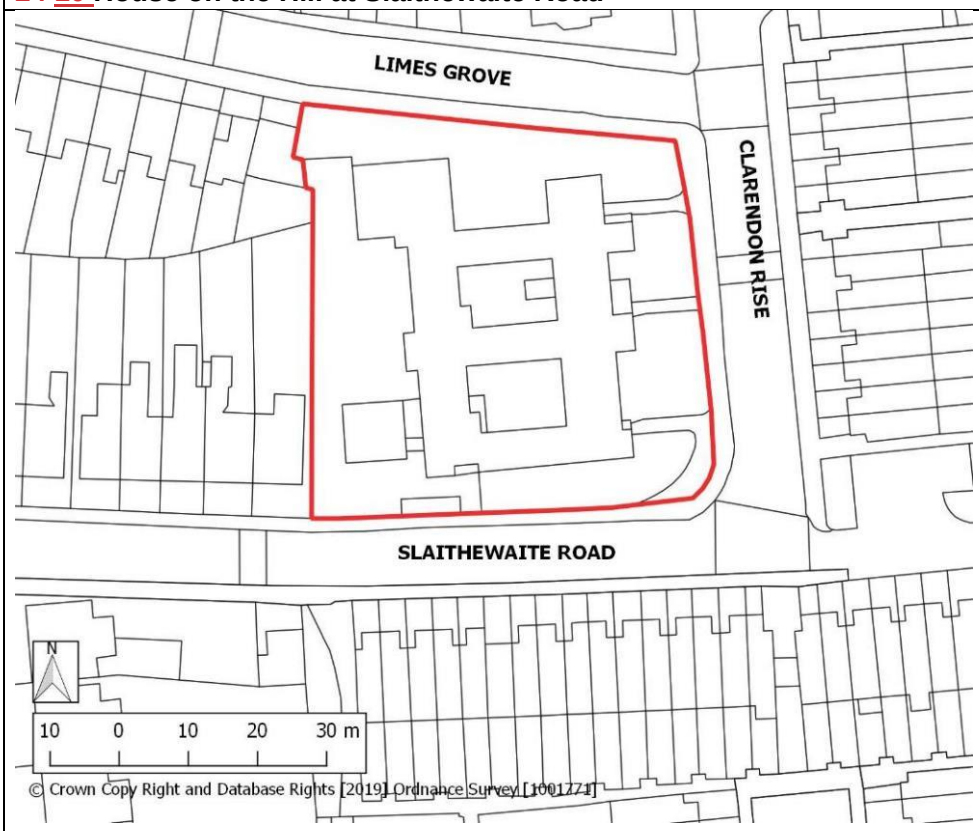
Commented [SA87]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~1.~~4. Development should maximise employment floorspace provision, including through reconfiguration of the existing buildings and spaces, and improve the overall environmental quality of the site. Proposals will be required to justify any net loss of the existing non-designated employment floorspace.

~~2.~~5. An element of affordable workspace should be delivered on-site.

~~3.~~6. The site is situated within a predominantly residential area and consideration will need to be given to the amenity of neighbouring and surrounding properties, including for daylight and sunlight.

~~24~~ 10 House on the Hill at Slaithewaite Road



Site address:	47 Slaithewaite Road, SE13 6DL			
Site details:	Site size (ha): 0.31 Setting: Urban, PTAL: In 2015: 6a, In 2021: 6a, In 2031: 6a, Ownership: Public Current use: Overnight stay respite centre			
How site was identified:	Strategic Planning Team (2019)			
Planning designations and site considerations:	Opportunity area~~,~~ Regeneration Node, Archaeological Priority Air Quality Management Area, Flood Zone 1, Groundwater Source Protection Zone 2			
Planning Status:	~~None~~Pre-application			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~36~~ 52		Gross non-residential floorspace: Employment 0 Main town centre 0	

Commented [SA88]: Factual update on designations

Commented [SA89]: Factual update – providing additional details on flood risk

Commented [SA90]: Factual update – on the progress made in redeveloping the site

Commented [SA91]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Site allocation

Redevelopment for residential use.

Opportunities

The site comprises several buildings and a courtyard which were occupied by a residential institution, including provision of specialist short stay care. The main building, covering the majority of the site, is currently vacant. Redevelopment provides an opportunity bring the site back into active residential use, with opportunities to deliver an increase in housing units.

Development requirements

1. Development must be delivered in accordance with the A21 Development Framework.
2. ~~1.~~ Redevelopment of the existing residential institution will be subject to Policy ~~HO7~~ HO6 (Supported and specialised a~~A~~ccommodation)
3. ~~2.~~ There are a number of trees of quality located within the site, particularly along its boundary, which must be retained.

Development guidelines

1. The site is located within a predominantly residential area and development should be designed to respond positively to the character of the surrounding properties.
2. Development should be designed in response to the site topography, particularly in terms of building heights and site levels.
3. Development should improve walking, cycling and other active travel modes, contributing to the A21 Healthy Streets corridor. Development should not result in a reduction in existing footway or carriageway space.
4. ~~2.~~ Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water and divert existing sewers where applicable.

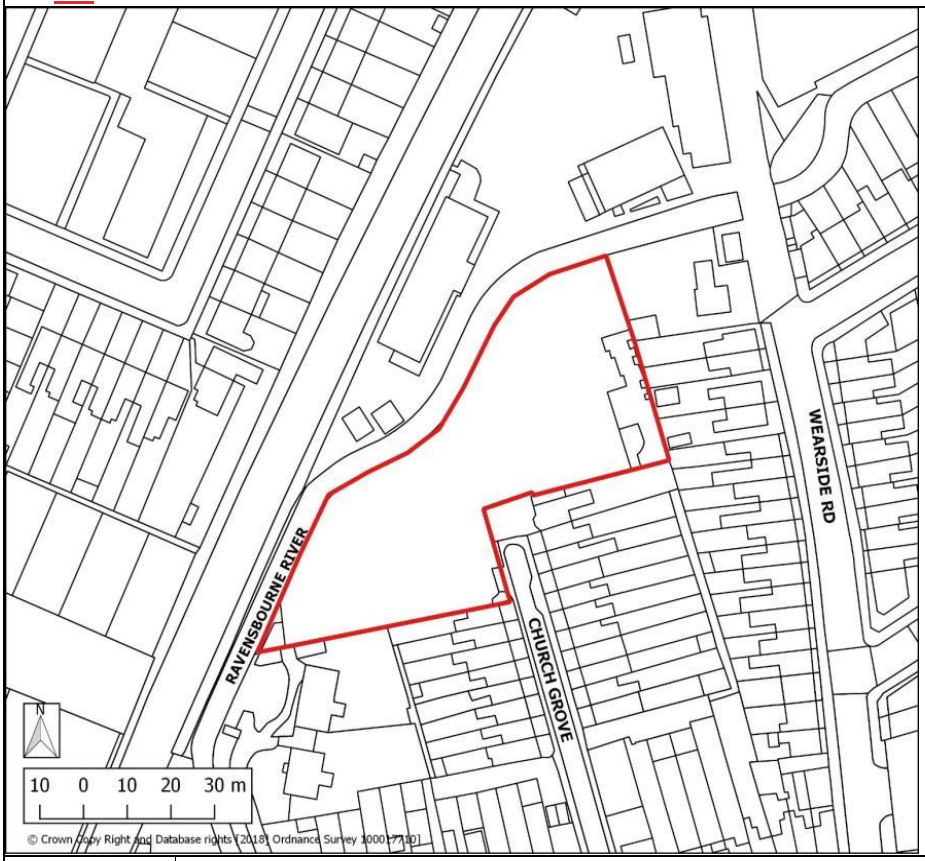
Commented [SA92]: Amended for clarity and to aid policy implementation

Commented [SA93]: Factual update – to reflect new policy numbers and titles in Regulation 19 plan

Commented [SA94]: Respond to consultation – request to reference A21 Healthy Streets Corridor and no reduction in existing footway or carriageway space.

Commented [SA95]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~15~~ 11 Church Grove Self-Build



Site address:	Land at Church Grove, London, SE13 7UU			
Site details:	Site size (ha): 0.35, Setting: Central, PTAL: In 2015: 5, In 2021: 5, In 2031: 5, Ownership: Public, Current use: Vacant land			
How site was identified:	London SHLAA (2017)			
Planning designations and site considerations:	Opportunity Area, Regeneration Node, adjacent to Conservation Area, adjacent Strategic Open Space, Archaeological Priority Area, Air Quality Management Area, Flood Zones ~~2, 3a, 3b~~3, Groundwater Source Protection Zone 1, Critical Drainage Area			
Planning Status:	Full application DC/17/104264 granted in December 2018 and S73 DC/20/119250 granted in April 2021. Started construction.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~33~~ 36		Gross non-residential floorspace: Employment 0 Main town centre 0	

Commented [SA96]: Factual update on designations

Commented [SA97]: Factual update – providing additional details on flood risk

Commented [SA98]: Factual update – on the progress made in redeveloping the site

Commented [SA99]: Capacity amended to reflect the planning consents granted for the site

Existing planning consent

DC/17/104264 - The construction of a part three/part four storey building incorporating balconies and a roof garden on vacant land at Church Grove SE13 comprising thirty-three (33) self-build dwellings (13 x 1 bed flats, 10 x 2 bed flats, 2 x 3 bed flats, 5 x 3 bed houses, 3 x 4 bed houses), together with community facilities, shared landscaping space, car parking, secure cycle and refuse storage, alterations to the access and other associated works.

DC/20/119250 – A S73 application for an additional 3 units.

Commented [SA100]: Factual update – to reflect that planning consent has been granted

Site allocation

Redevelopment for residential use (self-build) with complementary community uses. Public realm enhancements, including public access to the River Ravensbourne.

Opportunities

This site is located to the west of Ladywell local centre, with the River Ravensbourne running along its northern edge. The site was previously occupied by the Watergate School but is now vacant, and has been made available by the council for self-build housing. Redevelopment will assist in meeting local need this type of housing provision. Development will also enable public realm enhancements to improve access to the river, along with its amenity value

Development requirements

1. Consistent with the planning consent, all residential development must be for self-build housing.
2. Development must make provision of ancillary community facilities or community space.
3. Development must protect and enhance amenity value of the River Ravensbourne, including by providing public access to the river and maintaining an open vista through the site, taking into account the River Corridor Improvement Plan SPD.

Commented [SA101]: Amended for clarity and to aid policy implementation

Development guidelines

1. The design of development should respond positively to the site's river setting as well as the surrounding grain along Church Grove.
2. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

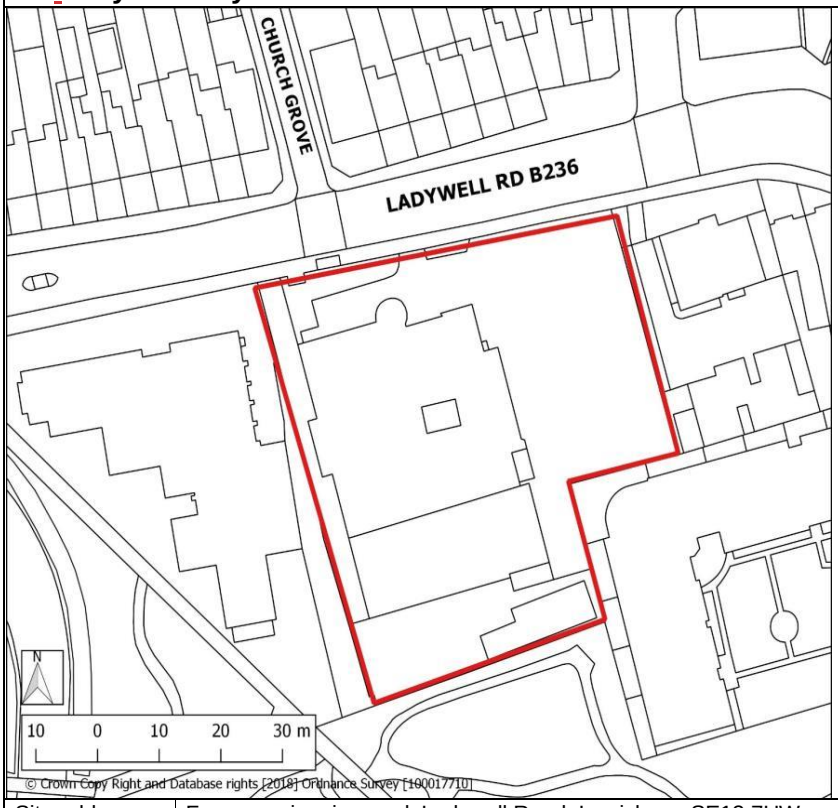
Commented [SA102]: Respond to consultation – Environment Agency request to provide text relating to flood risk

3. Applicants should work in partnership with Thames Water to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied. There is potential for discharge into Deptford Creek. New connections into the Deptford Church Street trunk sewer will not be allowed and impacts on Deptford Storm Overflow should be avoided.

Commented [SA103]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~1.~~4. The southern boundary of the site abuts St Mary's Conservation Area and is within it setting, which development must conserve and enhance.

12 Ladywell Play Tower



Site address:	Former swimming pool, Ladywell Road, Lewisham, SE13 7UW			
Site details:	Site size (ha): 0.32, Setting: Central, PTAL: In 2015: 5, In 2021: 5, In 2031: 5, Ownership: Private, Current use: Former swimming pool, Vacant land			
How site was identified:	London SHLAA (2017)			
Planning designations and site considerations:	~~-~~Opportunity Area, Regeneration Area, Conservation Area, Archaeological Priority Area, adjacent Metropolitan Open Land, Air Quality Management Area , Air Quality Focus Area , Waterlink Way, Flood Zones 2, 3 ~~and 3a~~, Groundwater Source Protection Zone 1, Critical Drainage Area, Listed Building on site			
Planning Status:	~~Pre-application~~Full application **DC/22/126038** and Listed Building Consent **DC/22/125927** was considered at Strategic Planning Committee on 6th October 2022.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: 33		Gross non-residential floorspace: Employment 0 Main town centre 1,459	

Commented [SA104]: Factual update on designations

Commented [SA105]: Factual update – providing additional details on flood risk

Commented [SA106]: Factual update – on the progress made in redeveloping the site.

Commented [SA107]: Capacities remain the same as Regulation 18 plan

Site allocation

Mixed-use development comprising main town centre, community and residential uses. Restoration and enhancement of the Grade II listed Ladywell Baths.

Opportunities

This is a site of historic significance which comprises a Grade II listed building, Ladywell Baths, and the land immediately surrounding it. The site is also surrounded by the Grade II listed Coroners Court and Mortuary and sits within the setting of the Grade II* listed St Mary's church and churchyard. Development will help to facilitate the restoration and enhancement of the Ladywell Baths, which is currently on the Heritage at Risk Register, bringing the building back into active use, with a new community focus for the neighbourhood.

Development requirements

1. A mix of complementary main town centre uses, including community uses. Residential development may be acceptable on the land surrounding Ladywell Baths.
2. Development must preserve and enhance the significance of heritage assets and their setting. This includes the former Ladywell Baths, the Grade II listed Coroners Court and Mortuary, Grade II* listed St Mary's church and churchyard, and St Mary's Conservation Area, including views within it.
3. Development must provide for the full restoration of the Ladywell baths.
4. Positive frontages along Ladywell Road

Development guidelines

1. The bulk, massing and building heights of any development within the grounds of the listed building will be expected to be subordinate and complementary to the historic civic character of the immediate context. The historic roofscape including the Baths, St Mary's church, and the Coroners court will be expected to remain dominant in the townscape and skyline.
2. Development proposals should seek opportunities to incorporate flexible space, which could be used as community space.
3. Development should enhance permeability and connections between green/open spaces and town centres~~.~~. Development on Ladywell Road should help to encourage activity between Ladywell Village and Lewisham High Street.
4. The layout of the site should protect the amenity of Waterlink Way and enable access to ~~to~~ it. Waterway Link runs through the site, from Ladywell Fields in the west, along the site's southern boundary with St Mary's Church, then northwards through the site, then along Wearside Road to the north of the site and through to Lewisham town centre.
5. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.
6. ~~4.~~ Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable, ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan and minimise the risk of flooding or surcharging when emptying swimming pools into the public sewer.

Commented [SA108]: Respond to consultation – Environment Agency request to provide text relating to flood risk

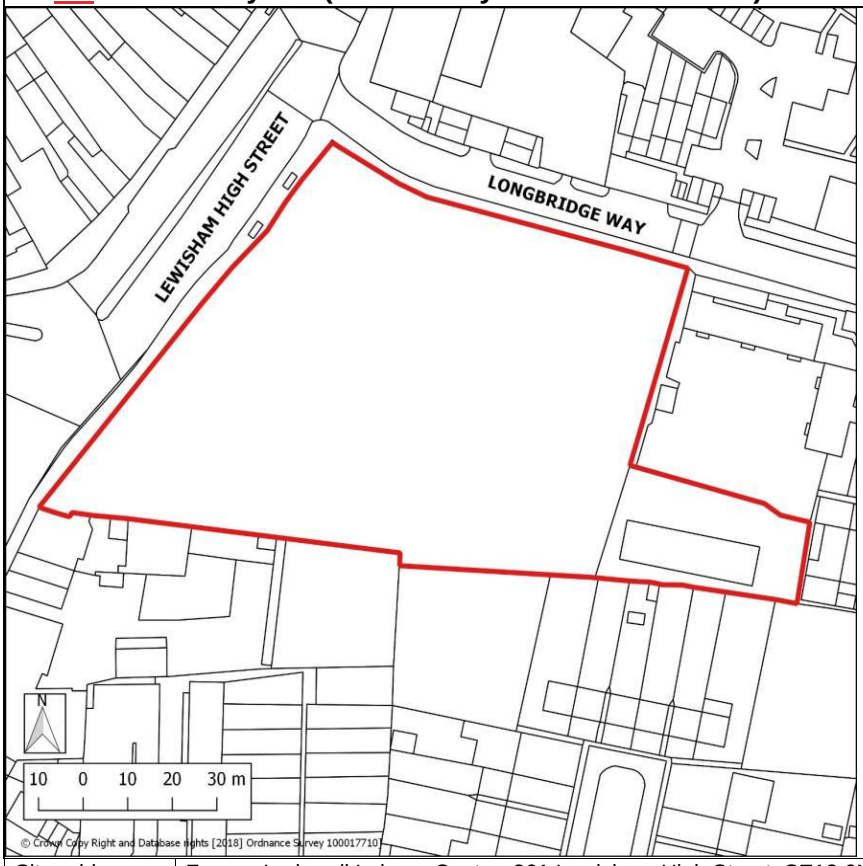
Commented [SA109]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~5.~~7. A tree survey should identify healthy, mature trees to be retained and replaced. Landscaping should form an integral part of the overall design.

~~6.~~8. Development should maximise opportunities for historical interpretation.

9. Large properties exist on either side of the site and there are terraced residential properties on the opposite side of Ladywell Road. To the west of the site is Ladywell Fields, a public open space designated as Metropolitan Open Land, Green Corridor and a Site of Importance for Nature Conservation. To the south of the site, the grounds of St Mary's church are also designated as Metropolitan Open Land, Green Corridor and a Site of Importance for Nature Conservation.

~~11~~ 13 PLACE/Ladywell (former Ladywell Leisure Centre)



Site address:	Former Ladywell Leisure Centre, 261 Lewisham High Street, SE13 6NJ			
Site details:	Site size (ha): 0.93, Setting: Central, PTAL: In 2015: 6a, In 2021: 6a, In 2031: 6a, Ownership: Public, Current use: Residential, Retail, Employment, Community use			
How site was identified:	Lewisham Town Centre Local Plan (2014) and London SHLAA (2017)			
Planning designations and site considerations:	Opportunity Area, Regeneration Node, Adjacent to Strategic Open Space, adjacent Conservation Area, Archaeological Priority Area, adjacent Urban Green Space, Major Centre, Night-time economy Hub, Air Quality Management Area, Air Quality Focus Area, Flood Zone 1, Groundwater Source Protection Zone 1, Critical Drainage Area			
Planning Status:	Full application DC/15/090792 granted in February 2015 for part of the site. Development complete but only has temporary consent ~~for four years~~. Pre-application.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10 Yes	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~224~~ 175		Gross non-residential floorspace: Employment ~~1,156~~462 Main town centre ~~4,622~~1,849	

Commented [SA110]: Factual update on designations

Commented [SA111]: Factual update – providing additional details on flood risk

Commented [SA112]: Factual update – on the progress made in redeveloping the site

Commented [SA113]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Existing planning consent

DC/15/090792 – The construction of a four-storey building at the former Ladywell Leisure Centre, 261 Lewisham High Street SE13, comprising 24 x 2 bed-flats on upper floors (Class C3), up to 8 x commercial units on the ground floor for flexible use as retail (Class A1), services (Class A2), business (Class B1) and/or Class D1 non-residential community uses (Class D1), associated soft and hard landscaping boundary treatments, cycle parking and bin store, for a limited period of up to 4 years.

Site allocation

Comprehensive mixed-use redevelopment comprising compatible main town centre, commercial, community and residential uses.

Opportunities

The site is located within Lewisham major centre and comprises the former Ladywell Leisure Centre and the land adjoining it. Part of the site fronting the High Street has been occupied by a meanwhile use, known as PLACE/Ladywell, consisting of a modular building integrating 24 residential units ~~housing~~ and workspace. This building is to be demounted and re-located elsewhere in the Borough. Redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the long-term vitality and viability of the town centre. Development will also help to reinvigorate the High Street through active frontages and improved connections with the surrounding residential area.

Commented [SA114]: Factual update – to reflect that there are existing residential units on site

Development requirements

1. Development must integrate with the measures set out in the A21 Development Framework.

Commented [SA115]: Amended for clarity and to aid policy implementation

~~1.~~2. Positive frontages along Lewisham High Street and Longbridge Way, with active ground floor frontages on the High Street.

~~2.~~3. Proposals involving the redevelopment of the Lewisham Opportunity Pre-School (LOPS) building may be acceptable, subject to appropriate re-provision of community infrastructure within the locality, in line with Policy CI1~~9~~ (Safeguarding and securing community infrastructure).

Commented [SA116]: Factual update – to reflect new policy numbers in Regulation 19 plan

~~3.~~4. The layout and design of development must respond positively to the housing estate immediately adjacent the site to the east, as well as the surrounding residential area. Development should support the delivery of a cohesive urban form and grain, with a clearly articulated network of routes across the site to improve permeability.

~~4.~~5. Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including enhancements along the High Street.

Development guidelines

1. Development should set out and reinforce a clear hierarchy of streets, routes and building heights, both within the site and in response to the adjacent network of residential streets.

2. Development should improve opportunities for walking, cycling and other active travel modes, contributing to the A21 Healthy Streets Corridor. Development should not result in a reduction in existing footway or carriageway space.

Commented [SA117]: Respond to consultation – request to reference A21 Healthy Streets Corridor and no reduction in existing footway or carriageway space.

3. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

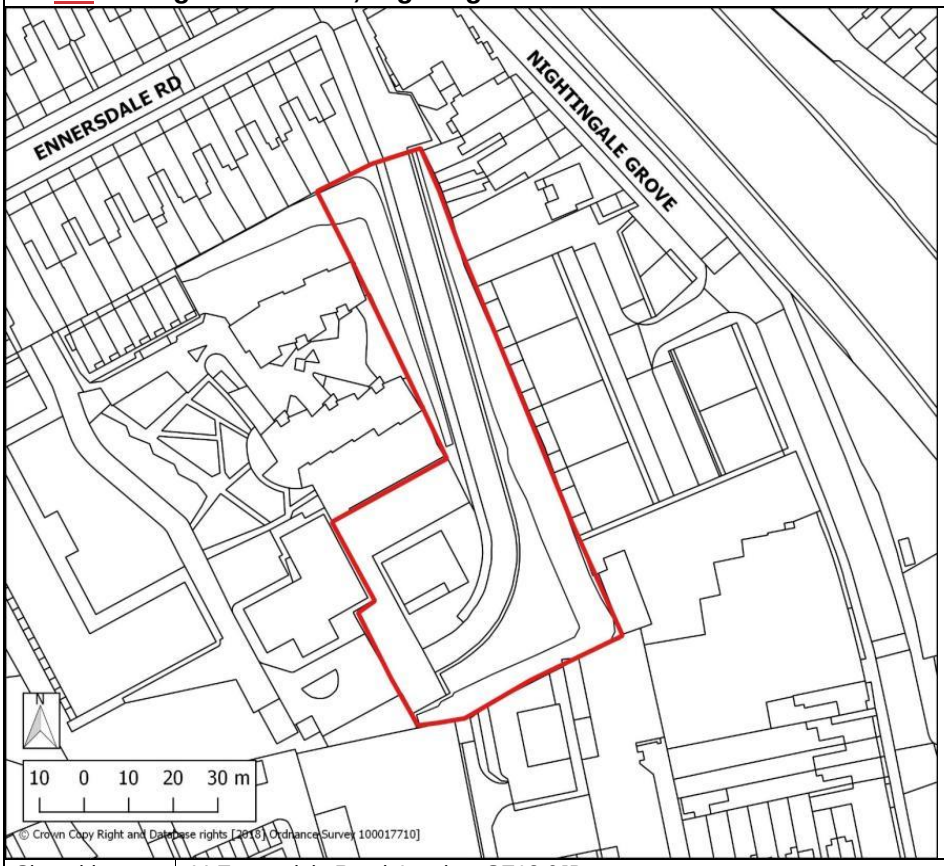
~~1.~~4. Residential ground floor frontages may be acceptable away from the High Street including at Longbridge Way.

~~2.~~5. The site is adjacent to St Mary's Conservation Area. Proposals will need to consider impacts on the significance of this heritage asset and its setting, including the impact on views from within the Conservation Area.

6. Historic spires are in view of the St Mary's Church.

Commented [SA118]: Respond to consultation – Environment Agency request to provide text relating to flood risk

~~13~~ 14 Driving Test Centre, Nightingale Grove



Site address:	44 Ennersdale Road, London, SE13 6JD			
Site details:	Site size (ha): 0.41, Setting: Central, PTAL: In 2015: 3, In 2021: 3, In 2031: 3, Ownership: Public, Current use: Driving Test Centre			
How site was identified:	Site Allocations Local Plan (2013), London SHLAA (2017) and landowner engagement (2019)			
Planning designations and site considerations:	Regeneration Node, Air Quality Management Area, Flood Zone 1, Groundwater Source Protection Zone 2			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 Yes	Beyond 15 years
Indicative development capacity:	Net residential units: 40		Gross non-residential floorspace: Employment 1,386 Main town centre 0	

Commented [SA119]: Factual update on designations

Commented [SA120]: Factual update – providing additional details on flood risk

Commented [SA121]: Capacities remain the same as Regulation 18 plan

Site allocation

Mixed-use redevelopment comprising compatible residential and commercial uses.

Opportunities

This backland site is located in close proximity to Staplehurst Road local centre and Hither Green station. It is currently occupied by a single storey building with ancillary car parking. Redevelopment will provide a more optimal use of land, with the introduction of residential uses that complement the surrounding properties.

Development requirements

1. The maximum viable amount of employment floorspace must be re-provided, in line with Policy ~~EC7~~ EC8 (Non-designated employment sites).
2. Development proposals must protect and seek to enhance green infrastructure, including existing mature trees.

Development guidelines

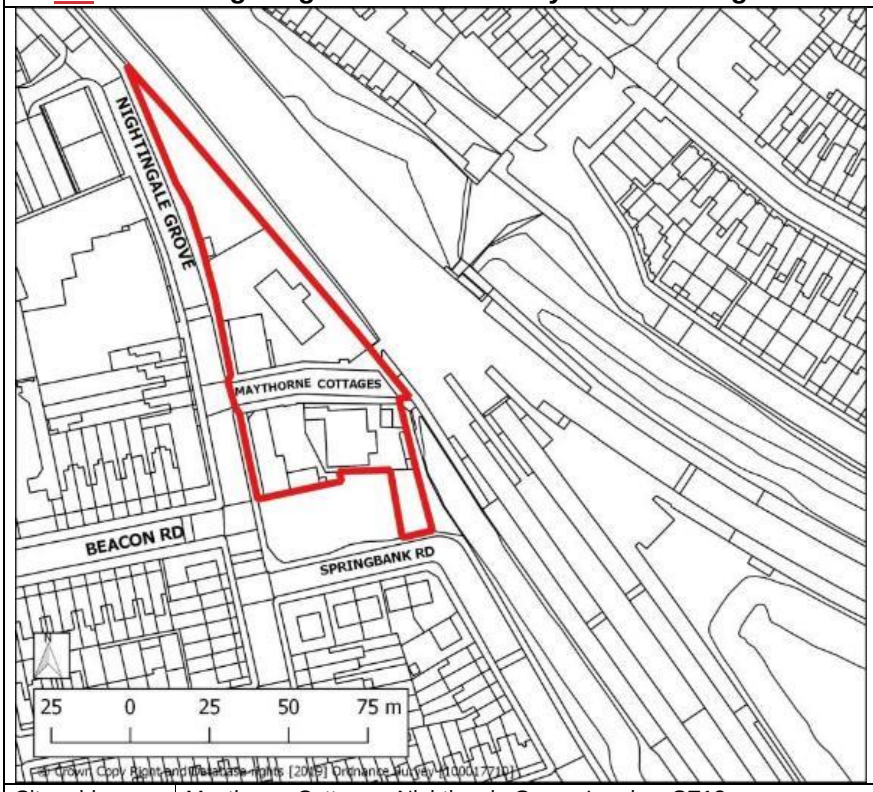
1. The development design should respond positively to the existing residential properties surrounding the site.
2. A fully residential scheme may be acceptable, subject to other policy requirements being satisfied.
3. The site is in proximity to Nightingale Grove, which is part of the London Cycle Network, and Hither Green station. Site access is currently oriented towards automobile users and proposals should seek to enhance walking and cycle access to the site. To contribute to Healthy Neighbourhoods, development should not result in a reduction in existing footway or carriageway space.
4. There is an electricity sub-station located just beyond the site's southern boundary, which will need to be taken into account.
5. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable, allow access for maintenance and repair of sewers and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan.

Commented [SA122]: Factual update – to reflect new policy numbers in Regulation 19 plan

Commented [SA123]: Respond to consultation – request to reference no reduction on footway or carriageway

Commented [SA124]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~14~~ 15 Land at Nightingale Grove and Maythorne Cottages



Site address:	Maythorne Cottages, Nightingale Grove, London, SE13
Site details:	Site size (ha): 0.43, Setting: Central, PTAL: In 2015: 3, In 2021: 3, In 2031: 3, Ownership: Private, Current use: Car services, Employment, Community, Vacant land
How site was identified:	Site Allocations Local Plan (2013) and London SHLAA (2017)
Planning designations and site considerations:	~~-~~Regeneration Node, Adjacent to Site of Importance for Nature Conservation, adjacent to Green Corridor, Air Quality Management Area, Flood Zone 1, Groundwater Source Protection Zone 2
Planning Status:	Full application DC/13/084806 for 35 Nightingale Grove granted in July 2014. Full applications DC/18/109200 and DC/18/110288 refused in January and April 2019. Full application DC/19/114830 granted in July 2020. Full application DC/19/113755 granted in November 2020.

Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15	Beyond 15 years
	Yes			

Indicative development capacity:	Net residential units: ~~42~~ 22	Gross non-residential floorspace: Employment ~~1,440~~ 179 Main town centre 0

Commented [SA125]: Factual update on designations

Commented [SA126]: Factual update – providing additional details on flood risk

Commented [SA127]: Factual update – on the progress made in redeveloping the site

Commented [SA128]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Existing planning consent

DC/13/084806 – the demolition of MOT testing station at 35 Nightingale Grove and construction of four storey building plus basement comprising an MOT testing station and 7 one bedroom and 1 two bedroom self-contained flats.

LE/792/35/TP (lapsed) demolition and replacement of MOT, 7 x 1 bed and 1 x 2 bed.

DC/19/114830 – construction of a building on land off Springbank Road and to the rear of 41-43 Nightingale Grove comprising 2 business units (B1) and 3 one-bedroom and 3 two-bedroom flats.

DC/19/113755 – construction of three buildings at 33 Nightingale Grove to provide 16 residential units (3 one-bedroom and 13 two-bedroom flats).

Commented [SA129]: Factual updates – to reflect that planning consents have been granted on this site

Site allocation

Mixed-use redevelopment comprising compatible residential, commercial and community uses. Public realm enhancements, including to the Hither Green station approach.

Opportunities

The site is located within Staplehurst Road local centre and situated at one of the main approaches to Hither Green station. A mix of housing, older and disused commercial floorspace, and a nursery are fragmented across the site. Redevelopment and site intensification, along with the improved integration of uses, will make a more optimal use of land to support the long-term vitality and viability of the local centre. Development will also deliver public realm enhancements to improve access to the station.

Development requirements

1. Development must be designed to enhance the station approach and provide for improved legibility, safety and access to the station. Consideration must be given to the underpass and public footpath at the eastern edge of the site boundary.
2. Positive frontages along Nightingale Grove and Maythorne Cottages.
3. The maximum viable amount of employment floorspace must be re-provided, in line with Policy ~~EC7~~ EC8 (Non-designated employment sites).
4. Development must retain or ensure appropriate re-provision of the existing day nursery, with priority given to on site re-provision, in line with Policy CI 1 (Safeguarding and securing community infrastructure).
5. Development proposals must protect and seek to enhance green infrastructure, including the Green Corridor and SINC adjacent to the railway embankment.

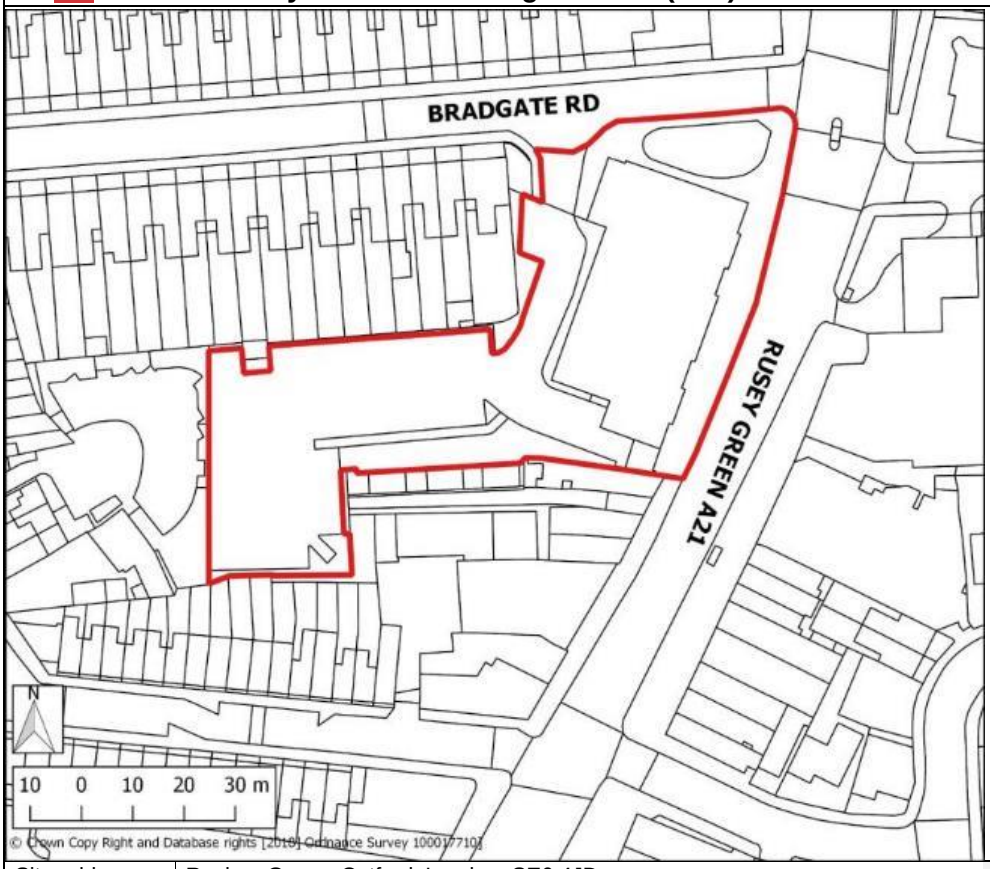
Commented [SA130]: Factual update – to reflect new policy numbers in Regulation 19 plan

Development guidelines

1. Development should enhance the station approach area through high quality public realm and the introduction of positive frontages along Nightingale Grove and Maythorne Cottages, with active ground floor frontages where possible.
2. In order to improve legibility and access to the station, consideration should be given to the use of sensitively integrated external lighting at the site boundaries.
3. Development must protect and wherever possible improve the amenity of the day nursery, particularly the outdoor play area.
4. Height, scale and massing of development should respond to the residential properties at 41-49 Nightingale Grove and 15-17 Springbank Road.

5. There are several electricity substations located within the site boundary which will need to be taken into account.

~~23~~ 16 Land at Rushey Green and Bradgate Road (Aldi)



Site address:	Rushey Green, Catford, London, SE6 4JD			
Site details:	Site size (ha): 0.50, Setting: Central, PTAL: In 2015: 6a, In 2021: 6a, In 2031: 6a, Ownership: Private, Current use: Main town centre uses, Retail, Car park			
How site was identified:	London SHLAA (2017) and Strategic Planning Team (2019)			
Planning designations and site considerations:	~~-~~Opportunity Area, Regeneration Node~~,~~ Archaeological Priority Area, Major Centre, Night-time Economy Hub, Air Quality Management Area, Air Quality Focus Area, Flood Zone 1, Groundwater Source Protection Zone 2.			
Planning Status:	None			
Timeframe for delivery:	~~2020/21 – 2024/25~~ Years 1-5	~~2025/26 – 2029/30~~ Years 6-10	~~2030/31 – 2034/35~~ Years 11-15	~~2035/36 – 3039/40~~ Beyond 15 years Yes
Indicative development capacity:	Net residential units: ~~119~~ 88	Gross non-residential floorspace: Employment 0 Main town centre 4,100		

Commented [SA131]: Factual update on designations

Commented [SA132]: Factual update – providing additional details on flood risk

Commented [SA133]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Site allocation

Comprehensive mixed-use redevelopment with compatible main town centre and residential uses.

Opportunities

The site is located within Catford major town centre, at its northernmost point along Rushey Green. It is currently occupied ~~a~~ by single storey retail building and car park and surrounded by an established residential area to the north, south and west. Comprehensive redevelopment and site intensification, along with the introduction of a wider range of uses, can deliver a more optimal use of land to support the long-term vitality and viability of the town centre. Redevelopment can also enable public realm and access improvements. There is an inactive frontage along Rushey Green which could be enhanced to complement the site's gateway position into the centre.

Development requirements

1. Development must be delivered in accordance the A21 ~~Corridor Intensification and~~ Development ~~SPD~~ Framework.
2. Positive frontages along Rushey Green and Bradgate Road, with active ground floor frontages on Rushey Green.

Development guidelines

1. Development should clearly define the edge of the A21 corridor with a well-integrated building line.
2. The existing frontage along Rushey Green should be re-designed as an active frontage that interfaces more positively with the adjoining public realm, marking the site as a transition point into Catford town centre.
3. Development should ensure that town centres uses (such as bars, restaurants, take-aways) do not impact on local amenity, in line with policy EC18 H and K (Culture, creative industries and the night-time economy).
4. Development should improve walking, cycling and other active travel modes, contributing to the A21 Healthy Streets corridor. Development should not result in a reduction in existing footway or carriageway space.

   ~~Rosenthal House, opposite on the eastern side of Rushey Green, establishes a wayfinding precedent at this end of the town centre, which this site may work in conjunction withto enhance townscape and legibility.~~
5. Whilst the residential character and scale of Bradgate Road should be acknowledged in massing ~~to north~~along the northern boundary, the width of the A21 offers an opportunity for more moderately scaled development, subject to amenity considerations.
6. Development ~~will also need to take into account the~~ should be designed to protect the amenity of properties at Bradgate Road to the north, Patrol Place and Wildfell Road to the south and Scrooby Street to the west, having regard to the Agent of Change principle and policy QD10 (Infill and backland sites, garden land and amenity areas).

Commented [SA134]: Respond to consultation – request that reference is made to the established residential area

Commented [SA135]: Factual update – to reference correct name of document

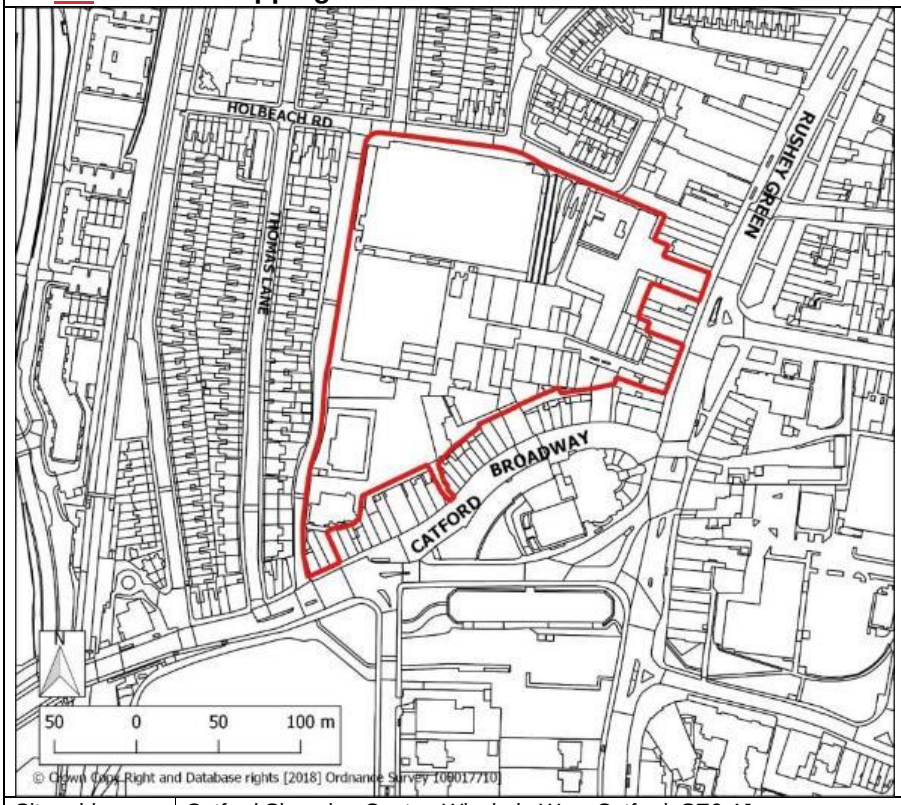
Commented [SA136]: Respond to consultation – request for text managing the concentration of uses and night time economy

Commented [SA137]: Respond to consultation – request to reference A21 Healthy Streets Corridor and no reduction in existing footway or carriageway space.

Commented [SA138]: Respond to consultation – in response to objections to wayfinding precedent and equal or taller building on this site

Commented [SA139]: Respond to consultation – request to protect the amenity of the surrounding streets

~~19~~ ~~17~~ Catford Shopping Centre and Milford Towers



Site address:	Catford Shopping Centre, Winslade Way, Catford, SE6 4J			
Site details:	Site size (ha): 3.42, Setting: Central, PTAL: In 2015: 6b, In 2021: 6b, In 2031: 6b, Ownership: Public, Current use: Main town centre uses, Retail, Residential, Car park			
How site was identified:	London SHLAA (2017), Catford Town Centre AAP (Withdrawn) and Catford Masterplan			
Planning designations and site considerations:	Opportunity Area, Regeneration Node, Appropriate Location for Tall Buildings, Archaeological Priority Area, Major Centre, Primary Shopping Area, Night-time Economy Hub, Air Quality Management Area, Air Quality Focus Area, Flood Zone ~~2~~1, Groundwater Source Protection Zone 1, Critical Drainage Area			
Planning Status:	~~None~~Pre-application for part of the site at Thomas Lane Yard.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10 Yes	Years 11-15 Yes	Beyond 15 years
Indicative development capacity:	Net residential units: 1084		Gross non-residential floorspace: Employment ~~4,914~~ 5,387 Main town centre ~~7,560~~ 21,546	

Commented [SA140]: Factual update on designations

Commented [SA141]: Factual update – providing additional details on flood risk

Commented [SA142]: Factual update – on the progress made in redeveloping the site

Commented [SA143]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Site allocation

Comprehensive mixed-use redevelopment of existing town centre comprising compatible retail, leisure, commercial, community and residential uses. Redevelopment of existing buildings and reconfiguration of spaces to facilitate a street-based layout with new and improved routes, both into and through the site, along with public realm and environmental enhancements.

Opportunities

This site forms the heart of Catford major centre. It is key to the transformation of Catford and will act as a major catalyst for local area regeneration, as part of a comprehensive masterplan framework incorporating a number of key sites. It encompasses land to the rear of Rushey Green and Catford Broadway, and is bounded to the north and west by Holbeach Road and Thomas' Lane, which provides pedestrian and vehicular access. The site is currently dominated by Milford Towers, residential blocks above a multi-storey car park, and ground floor retail units of various sizes, including a large format supermarket. Catford Market is located along the Broadway. Comprehensive redevelopment will deliver a significant amount of new housing together with modern retail (including a replacement large supermarket) and employment space, leisure, community and cultural facilities to support the long-term vitality and viability of the town centre, and reinforce its role as a civic and cultural hub. Development will also enable transformative public realm improvements to provide new and enhanced connections to and through the area.

Commented [SA144]: Respond to consultation - landowner request that reference is made to the existing retail store

Development requirements

1. Development must be delivered in accordance with the ~~-~~Catford Town Centre ~~Masterplan~~Framework.
2. Access, servicing and public realm improvements must complement and integrate with measures set out in the A21 ~~Corridor Intensification and~~ Development ~~SPD~~ Framework.
3. The site must be e-integrated with the surrounding street network to improve access and permeability into and through the town centre. This will require significant reconfiguration, re-orientation and re-planning of existing buildings and spaces to achieve a hierarchy of routes with clearly articulated east-west and north-south corridors.
4. Positive frontages with active ground floor frontages within the Primary Shopping Area and along key routes.
5. Protect and enhance Catford market.
6. Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including:
    a. Improvements to Catford Broadway
    b. Improvements to Rushey Green
    c. Provision of a new public open space to support the scale of development.

Commented [SA145]: Factual updates – to reference correct names of the documents

Development guidelines

1. It is important that development is designed to improve walking links through the site to Catford Broadway and Rushey Green. Routes should form part of and integrate with a network of new and existing connections to other key sites as well as to Catford and Catford Bridge stations.

2. Development should improve opportunities for walking, cycling and other active travel modes, contributing to the A21 Healthy Streets Corridor. Development should not result in a reduction in existing footway or carriageway space.

3. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

~~1.~~4. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Splitting flows across various connection points may be required as the existing network consists of small diameter pipes. An existing drainage plan should be submitted to aid in assessing pipe capacity.

~~Car parking provision should be the minimum required to maintain the viability of the town centre, whilst also reflecting the high level of public transport accessibility.~~

~~2.~~5. Building heights, scale and massing should provide for an appropriate transition from the perimeter of the site and its surrounds~~.~~.

~~3.~~6. Buildings should provide for a range of footprint sizes to accommodate a variety of town centre, commercial and community uses, including a replacement large supermarket, and be designed to provide flexibility to enable sub-division of units.

~~4.~~7. Active or animated frontages should be integrated on all main routes around and through the site, and within buildings that address the street, including at Thomas' Lane and Holbeach Road.

~~5.~~8. Development must make appropriate provision for and enhance Catford Market, with public realm treatments to generate visual interest and attract footfall.

Commented [SA146]: Respond to consultation – request to reference A21 Healthy Streets Corridor and no reduction in existing footway or carriageway space.

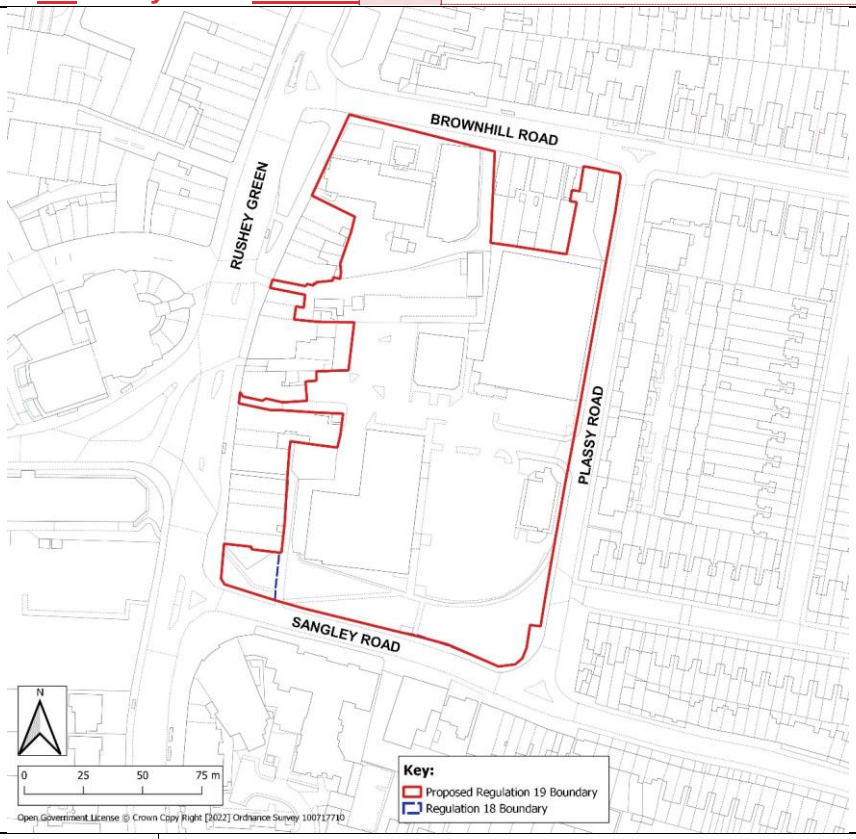
Commented [SA147]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA148]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

Commented [SA149]: Repetition - removed to ensure clarity in policy implementation - Car parking standards are set out in Policy TR4

Commented [SA150]: Respond to consultation - landowner request that reference is made to the existing retail store

~~20~~ 18 ~~Plassy Road~~ Catford Island



Site address:	Catford Island Retail Park, Plassy Road, Catford, SE6 2AW
Site details:	Site size (ha): ~~2.24~~ 2.28, Setting: Central, PTAL: In 2015: 6a, In 2021: 6a, In 2031: 6a, Ownership: Private, Current use: Main town centre uses, Retail, Residential, Car park
How site was identified:	London SHLAA (2017), Catford Town Centre AAP (Withdrawn), Lewisham Call for Sites (2015 and 2018) and Catford Masterplan
Planning designations and site considerations:	Opportunity Area, Regeneration Node, Appropriate Location for Tall Buildings, Archaeological Priority Area , Major Centre, Primary Shopping Area, Night-time Economy Hub, Air Quality Management Area, Air Quality Focus Area, Flood Zone 1, Groundwater Source Protection Zone 1
Planning Status:	Full applications ~~DC/17/103748~~ for part of the site granted ~~on appeal~~ in March 2019 and August 2021. Pre-application for remainder of the site~~.~~

Timeframe for delivery:			
Years 1-5 Yes	Years 6-10 Yes	Years 11-15	Beyond 15 years

Indicative development capacity:	
Net residential units: 602	Gross non-residential floorspace: Employment 6,206 Main town centre 6,206

Commented [SA151]: Factual update – the site allocation name has changed

Commented [SA152]: Respond to consultation – boundary amended to include TFL land

Commented [SA153]: Factual update on designations

Commented [SA154]: Factual update – providing additional details on flood risk

Commented [SA155]: Factual update – on the progress made in redeveloping the site

Commented [SA156]: Capacities remain the same as Regulation 18 plan

Existing planning consents

DC/17/103748 ~~–~~ Full application granted on appeal in March 2019 for the ~~The~~ demolition of existing buildings at Catford Timber Yard, 161 Rushey Green, SE6 and the construction of an eight-storey building to provide 42 residential units and 261 ~~sqm~~ m^2 (B1a) office space, together with the provision of disabled parking, play area and landscaping.

DC/20/117525 – Full application granted in August 2021 for the demolition of existing buildings at Catford Timber Yard, 161 Rushey Green, SE6 and the construction of an eight-storey building to provide 42 residential units and 261 m^2 (B1a) office space, together with the provision of disabled parking, play area and landscaping

Commented [SA157]: Factual update – to reflect that planning consents have been granted on this site.

Site allocation

Comprehensive mixed-use redevelopment with compatible main town centre, community and residential uses. Redevelopment and reconfiguration of the majority of buildings and spaces to facilitate the realignment of the A205 South Circular and associated public realm enhancements, including new public open space, improved walking and cycle routes, and vehicular access.

Opportunities

The 'island' is formed by the A21/A205 gyratory system, which separates the site from the heart of the town centre. It is currently occupied by large format retail park buildings and car parking, a timber yard, and shop units fronting Brownhill Road and Rushey Green (A21). Eros House is located at its northwest corner. Comprehensive redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the long-term vitality and viability of the town centre. Redevelopment can also enable public realm and access improvements, better connecting the site to its immediate surrounds and enhancing its function as the southeast gateway to the town centre.

Development requirements

1. Development must be delivered in accordance with the Catford Town Centre ~~Masterplan~~ Framework, ~~-~~and integrate with the measures set out in the A21 ~~Corridor Intensification and~~ Development ~~SPD~~Framework.

Commented [SA158]: Amended for clarity and to aid policy implementation and factual update - to reference correct name of document.

2. Development must not prejudice the delivery of transport infrastructure, including public realm enhancements associated with the re-alignment of the A205. The siting of buildings must ensure the traffic and transport improvements along the South Circular at Sangley Road, Plassy Road and Brownhill Roads can be implemented in full.
3. The site must be re-integrated with the surrounding street network to improve access and permeability in the local area, and to better integrate the site with the Primary Shopping Area. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors.
4. Positive frontages with active ground floor frontages along key routes.
5. Delivery of new and improved public realm in accordance with a site-wide public realm strategy. This must integrate provision of new public open space appropriate to the scale of development.

Development guidelines

1. In order to optimise the site's capacity, and to ensure a more complementary fit with the prevailing urban grain, 'out of centre' style low-density large format units or

warehouses will be resisted. Development should create a positive relationship with the planned changes to and realignment of the South Circular, with active ground floor frontages -complemented by appropriate buffers and set back distances.

2. 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.

3. The layout and design of development should clearly articulate and improve the boundaries of the site. Public realm, landscaping and buildings should be well integrated and function to both define and overlook walking routes within and adjacent to the site.

4. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

5. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable, allow access for maintenance and repair of sewers and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. New connections into the Lewisham trunk sewer will not be allowed.

~~3.~~6. The design of development should respond positively to the residential properties to the site's east, having regard to existing townscape features. Tall buildings should be located centrally on the site and not be located along the site's eastern boundary.

7. Green space across the site should contribute towards a network of green infrastructure across the town centre.

~~4.~~8. Development should improve walking, cycling and other active travel modes between Sangley Road, the Corbett Estate and Catford Town Centre, contributing to the A21 Healthy Streets Corridor. Development should not result in a reduction in existing footway or carriageway space.

~~5.~~9. Options for the site currently occupied by Eros House should be explored to better integrate it into a comprehensive scheme for the wider site allocation.

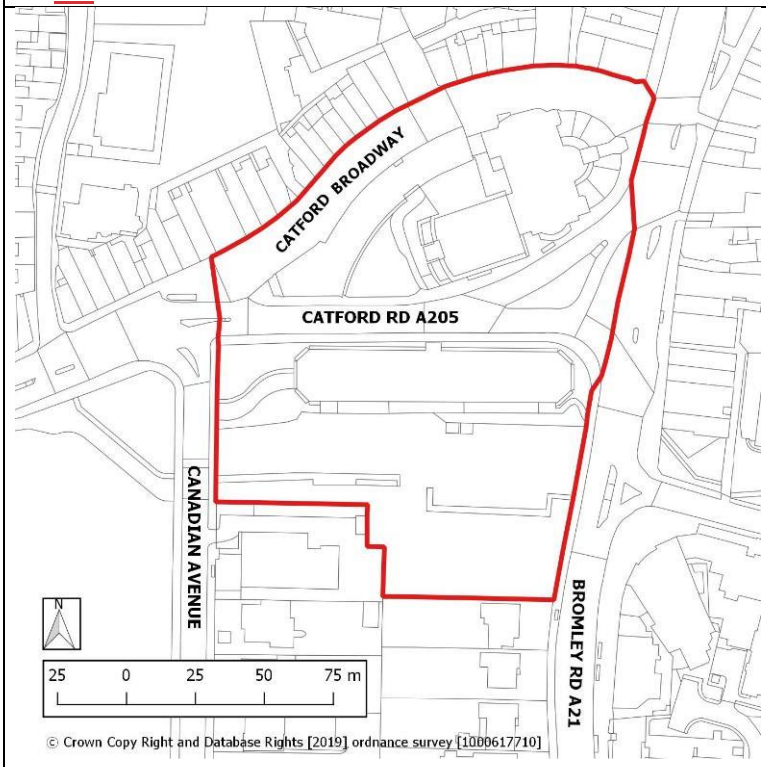
Commented [SA159]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA160]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

Commented [SA161]: Respond to consultation – landowner request to provide text relating to tall buildings, to reflect the content of the Catford Town Centre Framework

Commented [SA162]: Respond to consultation – request to reference A21 Healthy Streets Corridor and no reduction in existing footway or carriageway space.

~~21~~ 19 Laurence House and Civic Centre



Site address:	Laurence House, 1 Catford Road, Catford, London, SE6 4RU			
Site details:	Site size (ha): 2.21, Setting: Central, PTAL: In 2015: 6a, In 2021: 6a, In 2031: 6a, Ownership: Public, Current use: Civic Offices, Library, Car park			
How site was identified:	Call for Sites (2015), London SHLAA (2017),Catford Town Centre AAP (Withdrawn) and Catford Masterplan			
Planning designations and site considerations:	Opportunity Area, Regeneration Node, Appropriate Location for Tall Buildings, Growth Corridor, adjacent Conservation Area, Archaeological Priority Area, Major Centre, Primary Shopping Area, Night-time Economy hub, Air Quality Management Area, Air Quality Focus Area, Flood Zone~~s 1 and~~ 2, Groundwater Source Protection Zone 1, Critical Drainage Area, 1 Listed Buildings on site			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10 Yes	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: 262		Gross non-residential floorspace: Employment 12,935 Main town centre 6,017	

Commented [SA163]: Factual update on designations

Commented [SA164]: Factual update – providing additional details on flood risk

Commented [SA165]: Capacities remain the same as Regulation 18 plan

Site allocation

Comprehensive mixed-use development with compatible main town centre uses, including civic and cultural uses, and residential uses. Realignment of the A205 (South Circular) to facilitate town centre regeneration along with public realm and access improvements.

Opportunities

The site comprises the civic and cultural heart of Catford major town centre, with the Civic Suite and Lawrence House buildings along with the Grade II Listed Broadway Theatre. Re-alignment of the A205 South Circular, delivered in partnership with Transport for London, will address existing issues of severance and pedestrian and vehicular circulation within the local area, and facilitate transformational regeneration of the town centre. The realignment of the A205 will deliver major public realm and access improvements, better linking the site to the rest of the town centre and wider neighbourhood area. Redevelopment also provides opportunities to deliver enhanced or new civic space.

Development requirements

1. To ensure comprehensive development of the site, proposals must be delivered in accordance with the Catford Town Centre ~~Masterplan~~ Framework, ~~taking into account~~and integrate with the measures set out in ~~the~~ the A21 ~~Corridor Intensification and~~ Development ~~SPD~~ Framework.

2. Provision of a mix of main town centre uses, incorporating civic and cultural uses.

3. Preserve or enhance the Broadway Theatre as a performance facility.

~~2.~~4. 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.

~~3.~~5. Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including public realm enhancements along Catford Road and Catford Broadway, with~~.~~ priority given to walking and cycle movements in order to improve connectivity between the site and the town centre to the north.

~~Preserve or enhance the Broadway Theatre.~~

Development guidelines

1. The bulk, scale, massing and height of development should respond positively and sensitively to the site location. Careful consideration should be given to heritage assets within and adjacent to this site, including the Grade II listed Broadway Theatre and Culverley Green Conservation Area.

2. Development should be designed to protect the amenity of residential properties, taking into account the theatre's out of hours' access and servicing needs, in line with the Agent of Change principle.

~~1.~~3. The siting and design of new development should consider existing framed views of the town centre from Bromley Road.

~~2.~~4. 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.

5. The layout of the site should promote green links~~,~~, along with safe walking and cycling routes between Canadian Avenue and Bromley Road, separate from the A205.

Commented [SA166]: Amended for clarity and to aid policy implementation and factual update – to reference correct name of document

Commented [SA167]: Respond to consultation – request to include performance facility, to ensure it retains it's current use

Commented [SA168]: Respond to consultation – request to reference out of hour's access for the Theatre and agent of change principle

6. Development should improve opportunities for walking, cycling and other active travel modes along A205 Catford Road, contributing to the A21 Healthy Streets Corridor. Development should not result in a reduction in existing footway or carriageway space.

7. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

8. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable, allow access for maintenance and repair of sewers and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. New connections into the trunk sewer will not be allowed.

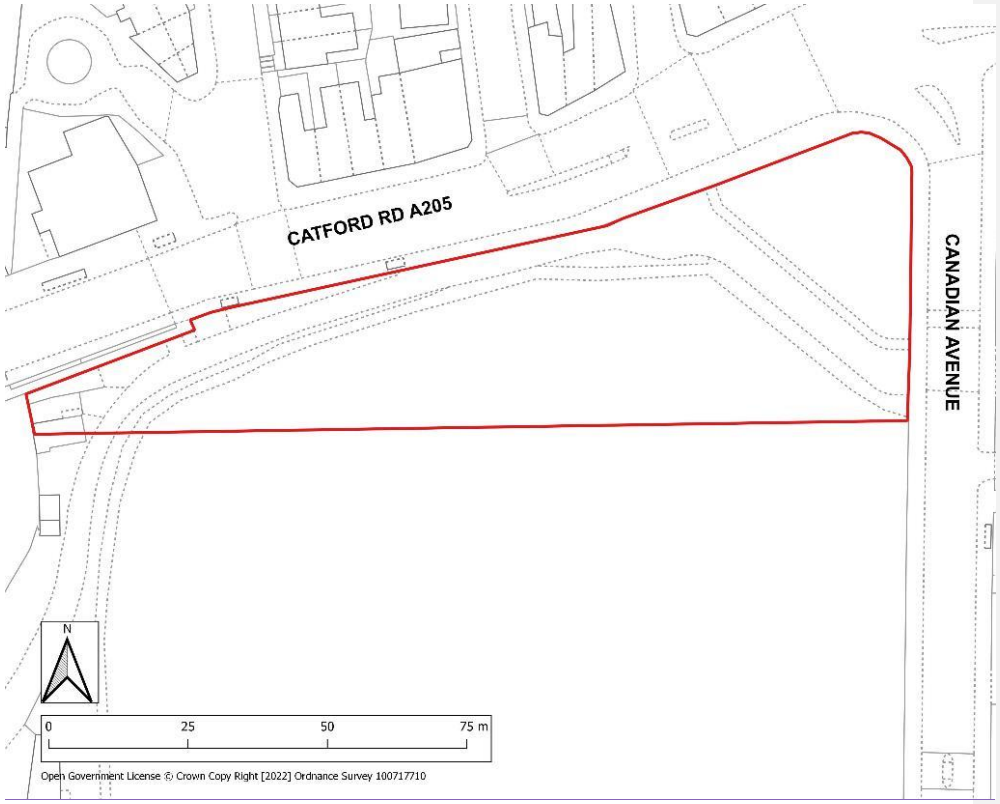
Commented [SA169]: Respond to consultation – request to reference A21 Healthy Streets Corridor and no reduction in existing footway or carriageway space.

Commented [SA170]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA171]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

20 South Circular

Commented [SA172]: New site allocation added



Site address:	South Circular, Catford, London			
Site details:	**Site size (ha)**: 0.42, **Setting**: Central, **PTAL**: In 2015: 6a, In 2021: 6a, In 2031: 6a, **Ownershi**p: Public **Current use**: Transport infrastructure			
How site was identified:	Strategic Planning Team (2022)			
Planning designations and site considerations:	Opportunity Area, Regeneration Node, Area of Archaeological Priority, adjacent Conservation Area, adjacent Site of Importance for Nature Conservation, ~~Public Open Space,~~Adjacent to Metropolitan Open Land, Waterlink Way, Air Quality Management Area , Air Quality Focus Area , Major Centre, Primary Shopping Area, Night-time Economy Hub, Flood Zones 2,3a,3b, Critical Drainage Area			
Planning Status:	None			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units 0		Gross non-residential floorspace: Employment 0 Main town centre 0	

Commented [SA173]: Factual update on designations

Site allocation

Re-routing of the A205 South Circular.

Opportunities

The A205 South Circular currently runs to the north of Laurence House. The busy and congested road currently severs the Civic Centre area and creates a barrier to movement for pedestrians. Complicated road junctions and a lack of safe pedestrian crossing points and cycle lanes further exacerbate the situation. A new road layout design, with Catford Road realigned to the south of Laurence House, provides an opportunity to create a much improved consolidated and people focused public realm at the heart of the revitalised town centre. The provision of large and flexible open spaces, to enhance the setting of existing and new buildings, could allow for a range of activities to take place.

Development requirements

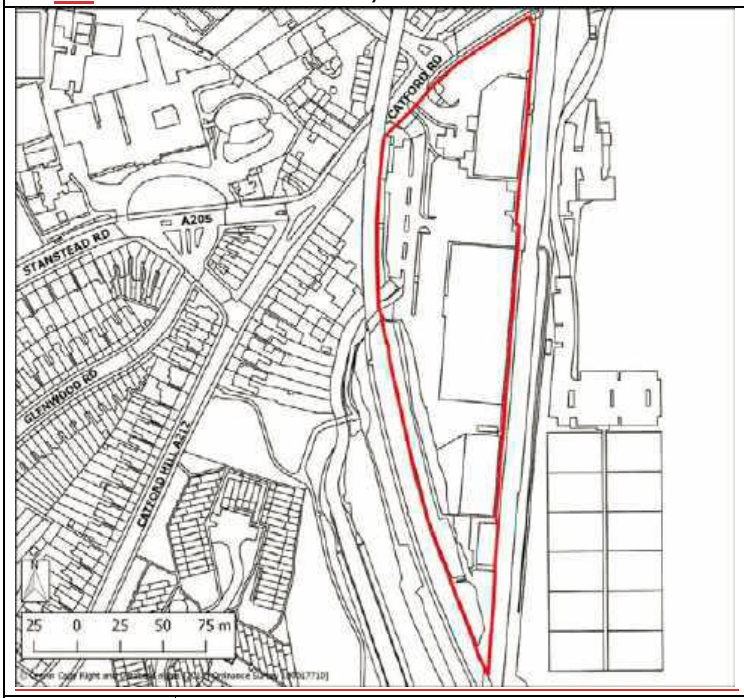
1. The land is required for the re-routing of the A205 South Circular.
2. De-designation of the Metropolitan Open Land located within the St Dunstan's College will be de-designated, and used solely for the purposes of re-routing the A205 South Circular.

Development guidelines

1. The re-routed A205 South Circular should enable better flow of pedestrians and cyclists along the new road.
2. Development should improve opportunities for walking, cycling and other active travel modes along A205 Catford Road, contributing to the A21 Healthy Streets Corridor. Development should not result in a reduction in existing footway or carriageway space.

Commented [SA174]: Respond to consultation – request to reference A21 Healthy Streets Corridor and no reduction in existing footway or carriageway space.

~~22~~ 21 Wickes and Halfords, Catford Road



Site address:	1-7 Catford Hill, Catford, London, SE6 4NU			
Site details:	Site size (ha): 2.06, Setting: Central, PTAL: In 2015: 4-6b, In 2021: 4-6b, In 2031: 4-6b, Ownership: Private, Current use: Main town centre uses, Retail, Car park			
How site was identified:	London SHLAA (2017), Catford Town Centre AAP (Withdrawn) and Catford Masterplan			
Planning designations and site considerations:	Opportunity Area, Archaeological Priority Area, adjacent Site of Importance for Nature Conservation, adjacent Metropolitan Open Land, adjacent Urban Green Space, Major Centre, Night-time Economy hub, Air Quality Management Area, Air Quality Focus Area, South-east London Green Chain Area, Waterlink Way, Flood Zones ~~2, 3a, 3b~~1, 2, 3, River Ravensbourne on-site and culverted, Groundwater Source Protection Zone 1, Critical Drainage Area			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10 Yes	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: 512		Gross on-residential floorspace: Employment 8,946 Main town centre 2,982	

Commented [SA175]: Factual update – providing additional details on flood risk

Commented [SA176]: Capacities remain the same as Regulation 18 plan

Site allocation

Comprehensive residential led mixed-use redevelopment with compatible main town centre and commercial uses. Reconfiguration of buildings and spaces to facilitate public realm enhancements including new public open space, river restoration, improved walking and cycle routes and vehicular access.

Opportunities

This site is located at the western edge of Catford major town centre, between the Catford and Catford Bridge railway lines and to the south of the A205 South Circular. It is currently occupied by large format retail units with associated surface car parking and light industrial uses. The River Ravensbourne cuts diagonally through the site to the north in a covered channel. The town centre boundary will be extended to include the site. A more optimal use of land can be made through site intensification as well as enhancing the site's function as the southwest gateway to the town centre. Redevelopment will also enable public realm and environmental improvements to be delivered, with key opportunities to reinstate the River Ravensbourne.

Development requirements

1. Development must be delivered in accordance the Catford Town Centre ~~Masterplan~~Framework.
2. Site layout and design should improve access to and permeability across the wider town centre area, with enhanced walking and cycle connections to Catford and Catford Bridge stations and Waterlink Way.
3. A rationalised and/or re-positioned access onto Catford Road together with internal road layout, to create a safe, coherent and more legible vehicular access both to and through the site.
4. Positive frontages with active ground floor frontages on key routes~~. with~~ where appropriate. Residential uses will not be acceptable on ground floor or basement levels due to flood risk.
5. Development must deliver public realm enhancements and improve the site's relationship with Catford and Catford Bridge stations as well as the A205 South Circular.
6. Provision of new public open or green space around the River Ravensbourne, linking to Stansted Road, taking into account the River Corridor Improvement Plan SPD.
7. Retention of the Old Pumping Station located at the southern end of the site.
8. Development proposals must conserve and seek to enhance green infrastructure.

Development guidelines

1. The layout and design of development should clearly articulate and improve the boundaries of the site. Public realm, landscaping and buildings should be well integrated and function to both define and overlook walking routes within and adjacent to the site.
2. Innovative design solutions will be needed to overcome the level differences between the site and its surrounds, particularly to create an attractive boundary to the South Circular and to take advantage of the visual amenity provided by the Jubilee Ground.

Commented [SA177]: Factual update – to reference correct name of document

Commented [SA178]: Amended for clarity and to aid policy implementation

3. To minimise overshadowing on existing homes to the west, the taller elements of development should be located towards the eastern part of the site, whilst ensuring there is no adverse impact on the Metropolitan Open Land nearby.

4. Waterlink Way runs along the site's western and northern boundaries, providing a direct connection to the South Circular and wider town centre area, and via subway to Catford and Catford Bridge railway stations. Development should provide a contiguous link and improve opportunities for walking and cycling~~e movement~~ and other active travel modes and deliver the Greenwich to Kent House Cycleway along the Waterlink Way~~.~~ Development should not result in a reduction in existing footway or carriageway space.

5. Development should maximise opportunities to enhance the ecological quality and amenity provided by the River Ravensbourne, including by revealing the river through decul!verting, repairing gaps in Waterlink Way and improving public access to it.

6. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk, maximise opportunities for river restoration and protect the sensitive groundwater zone.

7. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network. New connections into the trunk sewer on Catford Hill will not be allowed. There are opportunities to daylight the Ravensbourne which is culverted on this site and expand the surface water network.

~~4.~~8. Proposals should investigate and maximise opportunities to facilitate links through the railway arches.

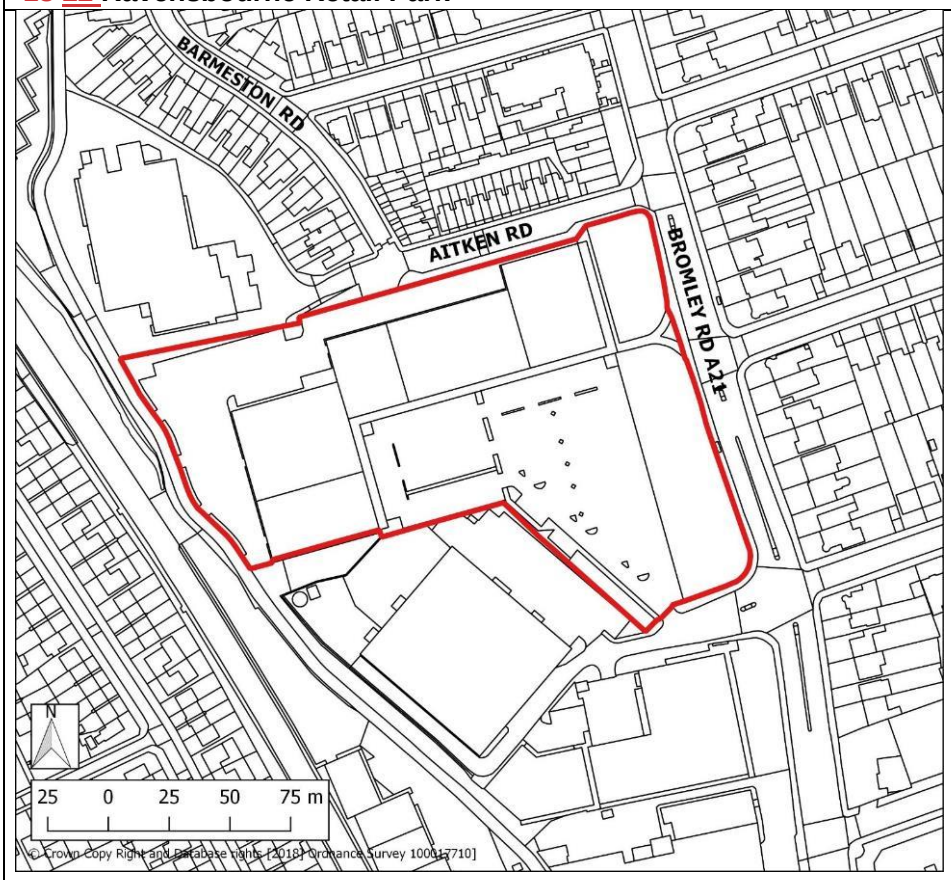
~~5.~~9. Commercial uses will be supported underneath the railway arches, at the western edge of the site, with priority given to uses that are likely to attract footfall to the town centre and are highly compatible with residential uses.

Commented [SA179]: Respond to consultation – request for reference to the Greenwich to Kent House cycleway and no reduction in footway and carriageway

Commented [SA180]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA181]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~18~~ 22 Ravensbourne Retail Park



Site address:	134 Bromley Rd, Bromley, London, SE6 2QU			
Site details:	Site size (ha): 2.46, Setting: Central, PTAL: In 2015: 4, In 2021: 4, In 2031: 4, Ownership: Private, Current use: Out of centre retail			
How site was identified:	Call for Site (2015), London SHLAA (2017) and Strategic Planning Team (2019)			
Planning designations and site considerations:	Regeneration Node, Appropriate Location for Tall Buildings, Conservation Area, Archaeological Priority Area, adjacent to Strategic Industrial Land, Air Quality Management Area, Flood Zones ~~2, 3a, 3b~~1,2,3,Groundwater Source Protection Zone 1, Critical Drainage Area, adjacent to Strategic Open Space, South East London Green Chain Walk			
Planning Status:	~~None~~Pre-application			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10 Yes	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~343~~ 367		Gross non-residential floorspace: Employment ~~0~~ 712,74986 Main town centre ~~12,786~~ 1,937	

Commented [SA182]: Factual update – providing additional details on flood risk

Commented [SA183]: Factual update on designations

Commented [SA184]: Factual update – on the progress made in redeveloping the site

Commented [SA185]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Site allocation

Comprehensive mixed-use redevelopment of existing out-of-centre retail park comprising compatible residential, main town centre and commercial uses. Public realm and environmental enhancements including new public open space and river restoration.

Opportunities

The site is located on Bromley Road which forms part of the A21 corridor. It is currently occupied by an out-of-centre retail park consisting of large format retail buildings and car parking. The River Ravensbourne runs along the site's western boundary. Comprehensive redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land. Rationalising of the retail offer will support the long-term vitality and viability of Catford major town centre, which is located nearby. Re-development will also enable public realm enhancements, including river restoration works and improved access to the River Ravensbourne.

Development requirements

1. Development proposals must be delivered in accordance with the A21 ~~Corridor Intensification and Development SPD~~Development Framework.
2. The site must be re-integrated with the surrounding street network to improve access and permeability into and through the site. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors, with direct walking and cycle access to a riverside amenity space.
3. Positive frontages along Bromley Road and Aitken Road.
4. Development must be designed to improve the ecological quality, carbon storage, flood 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.
5. Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including:
    a. Provision of new public open and/or green space, linking to Aitken Road.
    b. Public open space along the river.
    c. Public realm enhancements along Bromley Road with the retention of the current green space and an ~~to~~ improved ~~the~~ walking and cycle environment.

Development guidelines

1. Development should clearly define the edge of the A21 corridor with a well-integrated building line, including by extending the established building line to the north.
2. Development should improve opportunities for walking, cycling and other active travel modes, contributing to the A21 Healthy Streets Corridor. Development should not result in a reduction in existing footway or carriageway space.

~~1.~~3. A positive frontage should be established along the south side of Aitken Road to create a 'two-sided' street which relates sympathetically to the properties to the north.

~~2.~~4. Development should be designed so that primary vehicular access is from the A21 and Aitken Road. Opportunities should be explored to align the street network with

Commented [SA186]: Factual update – to reference correct name of document

Commented [SA187]: Amended for clarity and to aid policy implementation

Commented [SA188]: Amended for clarity and to aid policy implementation

Commented [SA189]: Respond to consultation – request to reference A21 Healthy Streets Corridor and no reduction in existing footway or carriageway space.

Barmeston Road to create a contiguous layout, where this would help to improve circulation and not adversely impact on local amenity.

~~3.~~5. Taller buildings that help with way finding along the A21 corridor may be acceptable, with development stepping up from Bromley Road. Taller elements should be positioned towards the centre of the site to manage and mitigate impacts on amenity, including overshadowing, on the surrounding residential areas.

~~4.~~6. Part of the site falls within the Culverley Green Conservation Area, which development must respond to positively ~~to~~.

7. Buffers between the adjoining employment sites will need to be introduced, and where they are existing, enhanced. These should include elements of green infrastructure wherever feasible.

8. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

9. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network.

~~5.~~10. Commercial uses that are compatible with existing and new residential properties ~~-~~will be supported in principle. All such provision should complement existing uses at the Bromley Road SIL to reinforce the local node of employment generating activity.

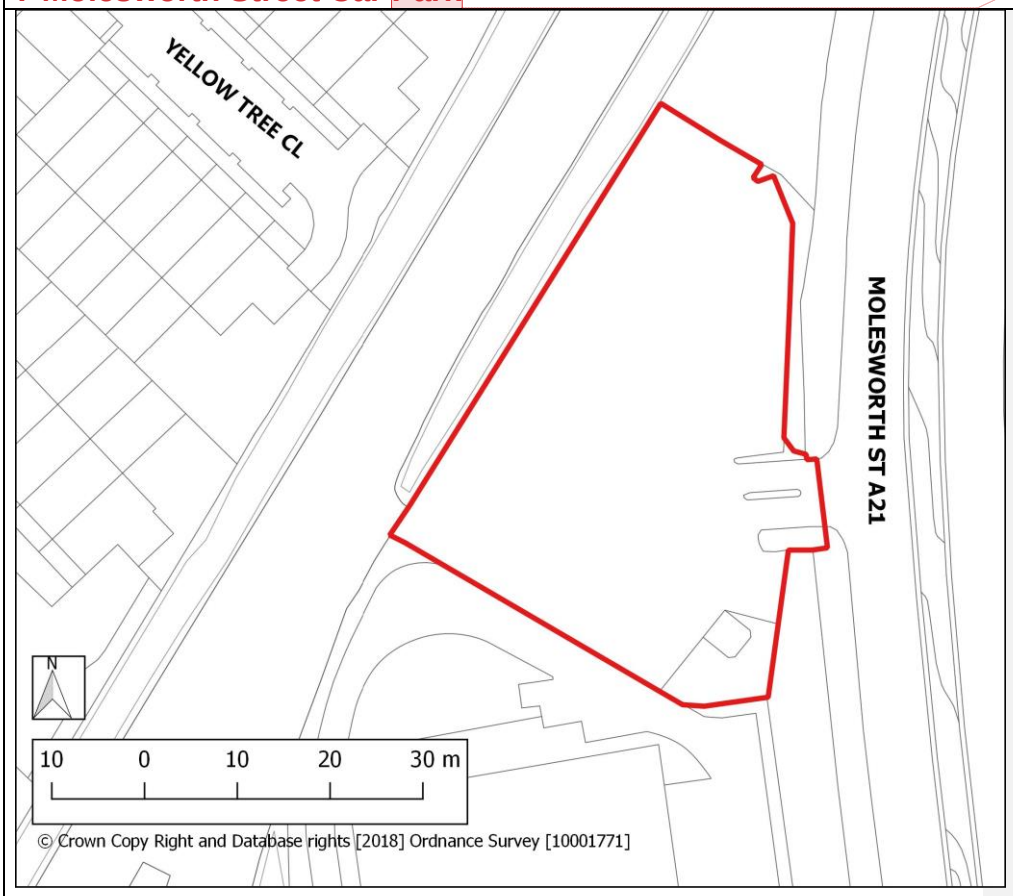
~~6.~~11. Where main town centre uses are incorporated these should not adversely impact on the town centre network. Development will be expected to achieve a significant reduction in the current amount of retail floorspace, with replacement retail provision focussed on servicing the site and its immediate surrounds.

Commented [SA190]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA191]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

7 Molesworth Street Car Park

Commented [SA192]: Respond to consultation - the site allocation has been removed from the Plan as it is needed as a flood storage site.



Site address:	Molesworth Street Car Park, Lewisham, London, SE13 7DS
Site details:	Site size (ha): 0.18, Setting: Central, PTAL: In 2015: 5-6a, In 2021: 5-6a, In 2031: 5-6a, Ownership: Public, Current use: Car park
How site was identified:	Strategic Planning Team (2019)
Planning designations and site constraints:	Opportunity Area, Area of Archaeological Priority, adjacent Site of Importance for Nature Conservation, Locally Significant Industrial Site, Air Quality Management Area, Air Quality Focus Area, Major Centre, Night-time Economy Hub, Waterlink Way, Flood Zone 3b, Critical Drainage Area.
Planning Status:	None
Timeframe for delivery:	2020/21 – 2024/25 2025/26 – 2029/30 2030/31 – 2034/35 2035/36 – 2039/40
Indicative development capacity:	**Net residential units:** 0 **Non-residential floorspace:** Employment: 5,670 Main town centre 0

Site allocation

Redevelopment of existing car park for commercial uses.

Opportunities

The site is located within Lewisham major centre and forms part of a Locally Significant Industrial Site, the majority of which is occupied by an operational multi-storey data centre. The site forms the residual land within the LSIS and is currently in use as a car park. Redevelopment of the site and the introduction of new workspace will provide a more optimal use of land to support the long-term vitality and viability of the town centre. There are also opportunities to deliver public realm enhancements along Molesworth Street.

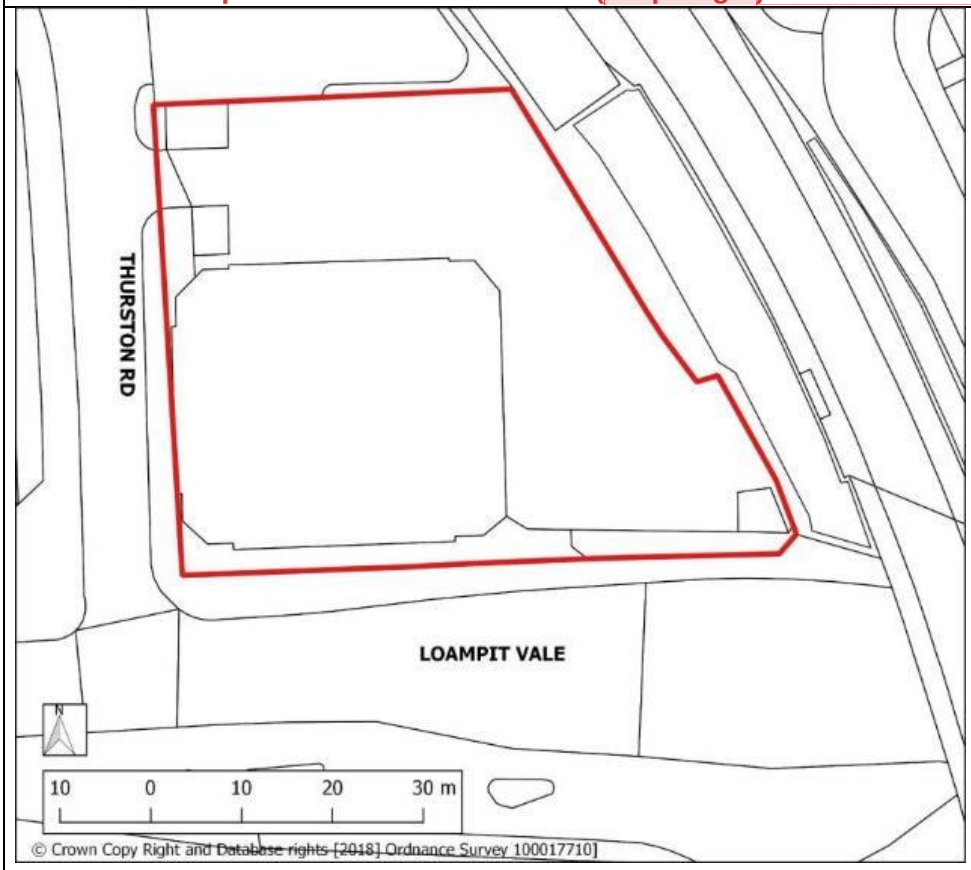
Development requirements

- Development must not compromise the functional integrity of the employment location, in line with Policy EC 5 (Locally Significant Industrial Sites).
- The nature of the commercial uses must be compatible with and not harm the amenity of the main town centre and residential uses in proximity to the site.
- Positive frontage at the site's eastern edge, along Molesworth Street.
- Development proposals must protect and seek to enhance green infrastructure, including the SINC adjacent to the site.

Development guidelines

- The design of the development should respond positively to the existing residential properties to the west of the site and the Shopping Centre to the east.
- The site's location within the town centre and adjacent to the Lewisham Shopping Centre will necessitate that commercial uses ae compatible with neighbouring uses and the local context. Use Class B2 and B8 commercial and industrial uses should therefore be avoided.
- Active ground floor frontages should be introduced along Molesworth Street, where possible.

9 Land at Loampit Vale and Thurston Road (Carpetright)



Site address:	Carpetright Site, Loampit Vale, Lewisham, SE13 7SN
Site details:	Site size (ha): 0.28, Setting: Central, PTAL: In 2015: 6b, In 2021: 6b, In 2031: 6b, Ownership: Private, Current use: Main town centre uses, Retail
How site was identified:	Lewisham Town Centre Local Plan (2014) and London SHLAA (2017)
Planning designations and site considerations:	Opportunity Area, adjacent Site of Importance for Nature Conservation, Air Quality Management Area, Air Quality Focus Area, Major Centre, Night-time Economy Hub, Flood Zone 3a, Critical Drainage Area
Planning Status:	Full application DC/17/102049 granted in February 2018
Timeframe for delivery:	2020/21 – 2024/25 2025/26 – 2029/30 2030/31 – 2034/35 2035/36 – 3039/40
Indicative development capacity:	Net residential units: 242 Gross non-residential floorspace: Employment 0 Main town centre 960

Commented [SA193]: Factual update – the site allocation has been removed from the Plan as it has been completed.

Existing planning consent

DC/17/102049 Comprehensive redevelopment of the Carpetright site, Loampit Vale, including the demolition of the existing Carpetright building and the construction of two buildings of 16 storeys and 30 storeys in height comprising 960sq.m non-residential floorspace comprising (A1) Shops, (A2) Financial & Professional Services, (A3) Restaurants & Cafes, (B1) Business, (D1) Non-residential Institutions and (D2) Assembly & Leisure uses and 242 residential units with private and communal open space, on-site energy centre, cycle parking and associated landscaping and public realm works.

Site allocation

Comprehensive mixed-use redevelopment with compatible main town centre, commercial and residential uses. Public realm enhancements to deliver a boulevard along Loampit Vale, with improved walking and cycle routes connecting to Lewisham interchange.

Opportunities

The site is located within Lewisham major centre on Loampit Vale, a main approach to the heart of town centre from the west. The site is currently occupied by a warehouse with a large format retail unit and a car park. Comprehensive redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the long-term vitality and viability of the town centre. Redevelopment will also enable public realm and access improvements, better connecting the site to its immediate surrounds as well as enhancing access to Lewisham interchange.

Development requirements

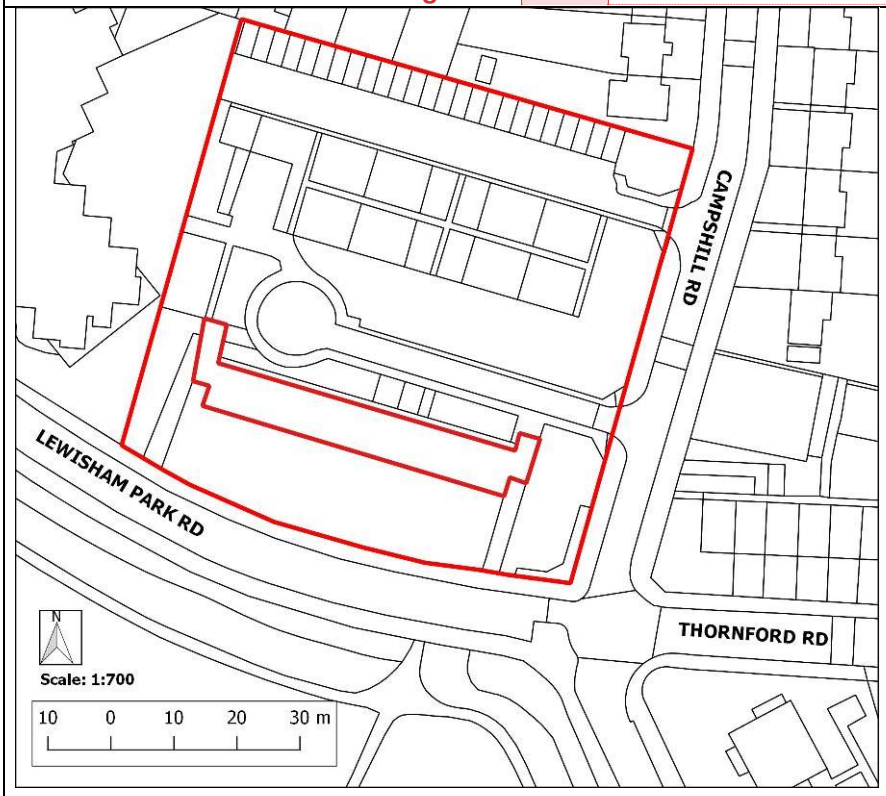
- Development must not prejudice the delivery of transport infrastructure, including the Bakerloo Line extension.
- The site must be re-integrated with the surrounding street network to improve access and permeability into and through the town centre, with enhanced connections to Lewisham interchange. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors, including walking and cycle friendly boulevards along Loampit Vale and Thurston Road.
- Positive frontages with active ground floor frontages along key routes.
- Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including a new station square.

Development guidelines

- The design of development should respond positively to the importance of Loampit Vale as a major route, and provide an appropriate transition in bulk, scale and massing towards Lewisham Gateway.
- Development should set out and reinforce a clear hierarchy of streets and building heights, both within the site and in response to the wider town centre area.
- Tree-lined pavements of a generous width, indicatively a minimum 6 metres, should define boulevards at Loampit Vale and Thurston Road with buildings set back at an appropriate distance.
- Proposals should be designed having regard to the Lewisham Retail Park site to ensure continuity of the boulevards along Loampit Vale and Thurston Road, and a coordinated approach to public realm and access. This includes provision of a new 'station square' to create a coherent public space and visual link between the sites.

- ~~Transport for London proposals for the extension of the Bakerloo Line through Lewisham town centre could have an effect upon the redevelopment potential of both the Lewisham Retail Park and Carpetright sites. This is as a result of new tunnels running underneath and the possibility of a new 'station box' being located partly on the bus layover site (to the north of the Carpetright site), and across a portion of the northern part of the Carpetright site. The bus layover site has been identified as the preferred location for the proposed extension.~~
- ~~Building lines may need to be set back to accommodate a dedicated bus lane for turning from Loampit Vale into Jerrard Street and the resultant depth of pavement.~~
- ~~Consideration should be given to the proximity of the proposed 'bus layover' site (part of the Lewisham Gateway development) when planning for sensitive uses on adjacent sites.~~

~~16 Land to the rear of Chiddingstone House~~



~~Site address:~~	~~Lewisham Park, SE13 6QU~~
~~Site details:~~	~~Site size (ha): 0.51, Setting: Central, PTAL: In 2015: 4-5, In 2021: 4-5, In 2031: 4-5, Ownership: Public, Current use: Garages~~
~~How site was identified:~~	~~Strategic Planning Team (2019)~~
~~Planning designations and site considerations:~~	~~Opportunity Area, adjacent to Conservation Area, Archaeological Priority Area, Air Quality Management Area, Flood Zone 1?~~
~~Planning Status:~~	~~Full application DC/14/089027 granted in December 2014. Minor Material Amendment application DC/16/099284 granted in January 2017. Started construction.~~
~~Timeframe for delivery:~~	~~2020/21 – 2024/25~~ ~~2025/26 – 2029/30~~ ~~2030/31 – 2034/35~~ ~~2035/36 – 3039/40~~ ~~Yes~~
~~Indicative development capacity:~~	~~Net residential units: 53~~ ~~Gross non-residential floorspace: Employment 0 Main town centre 0~~

Commented [SA194]: Factual update – the site allocation has been removed from the Plan as it has been completed.

Existing planning consent

DC/14/089027 - The construction of a part 2, part 3 and part 4 storey building comprising 46, one bedroom and 5, two bedroom flats with associated communal spaces, car parking and landscaping, located on land to the rear of Chiddingstone House, Lewisham Park SE13 6QU together with alterations to the external areas of Chiddingstone House and replacement boundary treatments.

DC/16/099284: An application submitted under Section 73 of the Town & Country Planning Act 1990 for a minor material amendment in connection with the planning permission (DC/14/89027) in order to allow an increase in two residential units (total of 53).

Site allocation

Redevelopment of the ancillary facilities associated with Chiddingstone House for specialist residential accommodation.

Opportunities

This infill site, to the rear of Chiddingstone House, is currently used for garages, storage lockers and a communal drying area. Redevelopment of these ancillary facilities for residential uses will make a more optimal use of land and help to meet local housing needs, particularly for specialist housing. New high quality development will also help to enhance local area character.

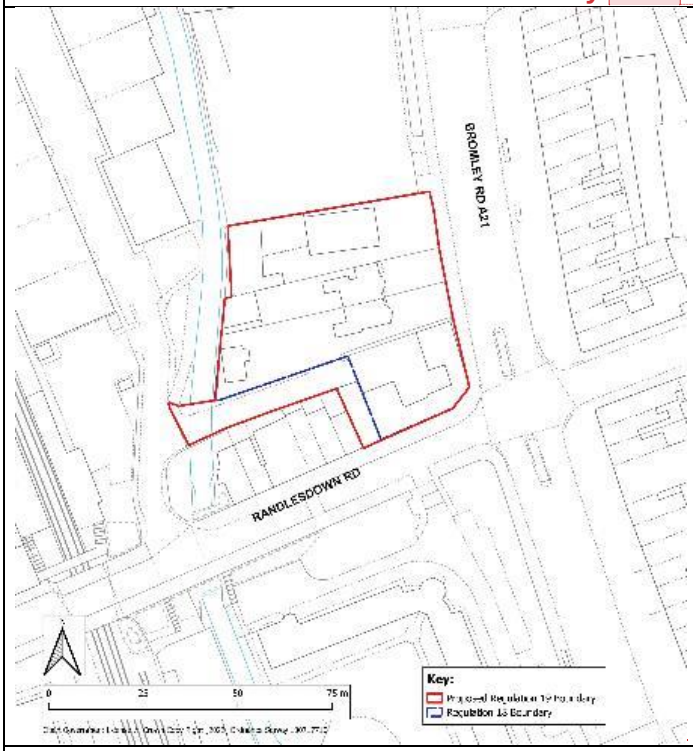
Development requirements

- Chiddingstone House must be retained.
- Delivery of predominantly specialist housing, with priority given to specialist older person's accommodation.
- Design of development must respond positively to the prevailing residential character of the site's surrounds. It should also be sympathetic to the amenity provided by Lewisham Park, located at the site's southern boundary.

Development guidelines

- Development should provide for a single access point from Campshill Road, servicing both Chiddingstone House and any new development on the site.
- A high quality landscaping scheme will be required. Development design should relate sensitively to the existing mature trees both on and adjacent to the site. This includes mature trees along the Lewisham Park Road boundary, and the southern part of the western boundary that provide for natural screening and should be retained.

~~25 Land at Randlesdown Road and Bromley Road~~



~~Site address:~~	~~Land at the corner of Randlesdown and Bromley Road, SE6 2XA~~
~~Site details:~~	~~Site size (ha): 0.30, Setting: Urban, PTAL: In 2015: 4, In 2021: 4, In 2031: 4, Ownership: Private, Current use: Industrial~~
~~How site was identified:~~	~~Strategic Planning Team (2019)~~
~~Planning designations and site constraints:~~	~~Strategic Industrial Land, Archaeological Priority Area, Critical Drainage Area, adjacent Local Centre, adjacent Strategic Area of Regeneration.~~
~~Planning Status:~~	
~~Timeframe for delivery:~~	~~2020/21 – 2024/25~~ ~~2025/26 – 2029/30~~ ~~2030/31 – 2034/35~~ ~~2035/36 – 3039/40~~
~~Indicative development capacity:~~	~~Net residential units: 0~~ ~~Gross non-residential floorspace: Employment 3,780 Main town centre 945~~

Commented [SA195]: Factual update – the site has been removed from the Plan as mixed use development is not suitable or deliverable on this SIL land without compensatory SIL being provided elsewhere.

~~**Site allocation**~~

~~Comprehensive employment-led redevelopment with compatible commercial and ancillary main town centre uses. Public realm enhancements, including to the Bellingham station approach.~~

~~**Opportunities**~~

~~The site is located within the Bromley Road Strategic Industrial Location and takes up a prominent position at the corner of Bromley Road and Randlesdown Road. 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 a more optimal use of the employment land, along with improving its environmental quality. Development will also enable public realm enhancements along the Bellingham station approach and the A21 corridor.~~

~~**Development requirements**~~

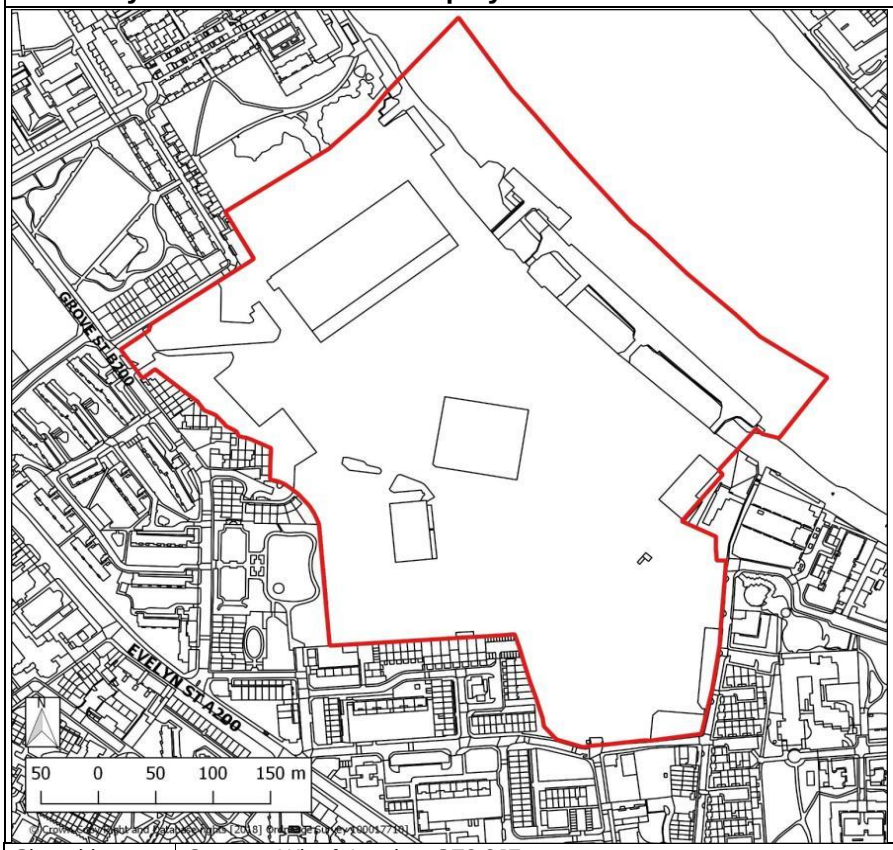
- ~~Development must not result in the net loss of industrial capacity, or compromise the functional integrity of the employment location, in line with Policy EC2 (Protecting employment sites and delivering new workspace).~~
- ~~Commercial and industrial uses must be the principal uses, supported by ancillary main town centre uses appropriate to the industrial location.~~
- ~~To Development must be delivered in accordance with the A21 Corridor Intensification and Development SPD.~~
- ~~Positive frontages along Bromley Road and Randlesdown Road.~~
- ~~Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including public realm enhancements along Bromley Road and Randlesdown Road.~~

~~**Development guidelines**~~

- ~~Where main town centre uses are incorporated they should be ancillary to the principal employment uses and function of the site, and located at the ground floor along Randlesdown Road to create a continuous shopping/commercial frontage of at the Bellingham station approach.~~
- ~~The Catford Bus Garage is located immediately to the north of the site and is in twenty-four hour operational use, which must be taken into account when considering amenity impacts.~~
- ~~Site access and servicing arrangements should be considered in conjunction with those of the existing shops along Randlestown Road and other industrial occupiers within the SIL. The use of Franthorne Way must be addressed by the development design.~~

North Area

1 Convoys Wharf Mixed-Use Employment Location



Site address:	Convoys Wharf, London, SE8 3JF
Site details: How site was identified:	Site size (ha): 20.46, Setting: Central, PTAL: In 2015: 0-2, In 2021: 0-2, In 2031: 0-2, Ownership: Private, Current use: Former Shipwrights house, Employment Lewisham Core Strategy (2011) and London SHLAA (2017)
Planning designations and site cons considerations:	Opportunity Area, Regeneration Node, Appropriate Location for Tall Buildings, Mixed-Use Employment Location, Safeguarded Wharf, Archaeological Priority Area, Thames Policy Area, ~~adjacent to Public Open Space~~, adjacent to Strategic Open Space, Site of Importance for Nature Conservation, Creative Enterprise Zone, Air Quality Management Area, Flood Zone 3~~a, 2~~, adjacent to River Thames, Tidal flood defences present on-site, Listed Buildings on site
Planning Status:	Full application DC/13/083358 ~~called in by Sectary of State~~was determined by the Mayor of London in March 2014 and planning permission was granted in March 2015. The first three plots were granted in June 2020 and started construction in early 2022. Reserved m~~m~~atters applications ~~will be~~have been ~~submitted during 2022~~ granted between August 2021 and September 2022.

Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15	Beyond 15 years
	Yes	Yes	Yes	

Commented [SA196]: Factual update on designations

Commented [SA197]: Factual update – providing additional details on flood risk

Commented [SA198]: Factual update – on the progress made in redeveloping the site

Indicative development capacity:	Net residential units: ~~3,514~~ 3,500	Gross non-residential floorspace: Employment ~~15,500~~ 47,700 Main town centre 50,400

Commented [SA199]: Capacities amended to reflect the planning consents granted for the site

Existing planning consent

DC/13/083358 outline application - resolved to grant planning permission by Mayor of London in March 2014 and permission granted in March 2015, consisting of:
The comprehensive redevelopment of Convoys Wharf to provide a mixed use development of up to 419,100m^2 comprising:

- up to 321,000m² residential floorspace (up to 3,500 units) (C3)
- up to 15,500m² employment floorspace (B1/Live/Work units) including up to 2,200m² for 3 no. potential energy centres
- wharf with associated vessel moorings and up to 32,200m² of employment floorspace (Sui Generis & Class B2)
- up to 5,810m² of retail and financial and professional services floorspace (A1 & A2)
- up to 4,520m² of restaurant/cafe and drinking establishment floorspace (A3 & A4)
- up to 13,000m² of community floorspace (D1) and assembly and leisure (D2)
- up to 27,070m² of hotel floorspace (C1)
- river bus jetty and associated structures
- 1,840 car parking spaces and vehicular access from New King Street and Grove Street
- retention and refurbishment of the Olympia Building and demolition of all remaining non-listed structures on site.

~~**DC/21/120651, DC/21/121852** and **DC/21/122900** - Reserved Matters applications for the first three plots (8, 15 and 22) in Phase 1 were approved in June 2020.~~

Commented [SA200]: Factual update – to reflect planning consents granted for the site

DC/18/107698 – Reserved matters application for layout, scale, appearance, access and landscaping for Plot 8.

DC/19/111912 – Reserved matters application for siting, layout, scale, appearance and access for Plot 15.

DC/21/120651 - Reserved matters application for scale and appearance for Plot 22.

DC/21/121852 – Reserved matters application for landscaping for Plot 15.

DC/21/122900– Reserved matters application for scale, appearance and access for Plot 8.

Site allocation

Comprehensive mixed-use redevelopment with compatible residential, commercial, community, and main town centre uses. Safeguarding and appropriate use of the wharf and associated vessel moorings. Delivery of new and improved transport infrastructure including a new road layout and an integrated network of walking and cycle routes. Public realm and environmental enhancements, including new public open space and riverfront restoration.

Opportunities

Convoys Wharf is a large brownfield site covering an area of more than 16 hectares, which is strategically located along the River Thames. In the 16th Century it was the site of the Royal Naval Dockyard. The site has been vacant for many years having last been used for industrial activities. Comprehensive redevelopment of the site is integral to supporting regeneration in the Deptford area, with the creation of a new high quality mixed-use quarter

that responds positively to its historical context. With the site's prominent riverside location, and proximity to Deptford High Street, there is significant scope for transformational public realm and environmental enhancements. These will support the delivery of a new residential area and visitor destination that is well-integrated with its surrounding neighbourhoods and communities. There are further opportunities to re-activate the safeguarded wharf that comprises part of the site, including for river based passenger transport.

Development requirements

1. Development must be delivered in accordance with a masterplan to ensure coordination of uses across the site.
2. Provision of commercial floorspace in line with Policy ~~EC 6~~ EC7 (Mixed-use Employment Locations).
3. The site must be fully re-integrated with the surrounding street network to improve access and permeability in the local area, with enhanced walking and cycle connections between public spaces and the site's surrounding neighbourhoods. Development must also enable new public transport services within and through the site. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors, including publicly accessible routes to and along the River Thames.
4. Provision of new community infrastructure to meet demand arising from the development, including a new school and health facilities.
5. Long-term protection and a~~A~~ppropriate ~~safeguarding and~~ re-activation of the existing safeguarded wharf and associated vessel moorings, including for river based passenger transport.
6. Delivery of new and improved public realm and open space in accordance with a site-wide public realm strategy, and taking into account the River Corridor Improvement Plan SPD, including:
    a. Repair of breaks in the Thames Path and extension of the route along the riverfront across the site, or as near as practical having regard to the safeguarded wharf
    b. New public open space at key points along the riverfront, including the Royal Navy and Royal Caroline Squares
    c. Integration of central public square / open space as a community focal point, with priority given to siting of the space between the Olympia Warehouse and the riverside
    d. Enhancements to Sayes Court Park and its setting
    e. A high quality station approach to the jetty (for river bus services), including walking and cycle routes
7. Re-instatement of the Thames-side pier with the creation a new riverfront park and public cultural space, incorporating the Thames Path, with opportunities for waterside activities.
8. Positive frontages along key routes, with active ground floor frontages along the riverfront and elsewhere where possible
9. Development proposals must protect and seek to enhance green infrastructure, including the SINC.

Commented [SA201]: Factual update – to reflect new policy numbers in Regulation 19 plan

Commented [SA202]: Respond to consultation – to reference long-term protection

Commented [SA203]: Amended for clarity and to aid policy implementation

10. The design of the development must be demonstrably informed by and reflect the site's historical character and significance.

Development guidelines

1. Development should support the creation of a new high quality, mixed-use neighbourhood and visitor destination that is well integrated with its surrounding neighbourhoods and communities.

2. Development should provide for a main access route north/south of Deptford High Street/New King Street to the Thames frontage, with measures to improve legibility and access to Deptford High Street.

3. The development should be designed to maximise views to and from the River Thames. Where tall and taller buildings are proposed, consideration will need to be given to protected views, vistas and landmark features, including the Grade II* Listed St Nicholas Church, the panorama towards the Maritime Greenwich World Heritage Site, and protected vistas of St Paul's Cathedral.

4. In response to the scale and location of the site, development should provide for complementary and distinctive character areas across it. These should reflect and reinforce the hierarchy of streets and open/green spaces, with a differentiation in design, density, scale and massing, including a range of plot sizes and building heights.

5. Development should make provision of open space to enlarge Sayes Court Park and celebrate the sites historic connection with John Evelyn. New gardens, landscaping and treatment of the public realm should connect with the memory of John Evelyn's famous 17th century garden that once flourished on the site.

6. Development should be designed to improve connectivity with, and maximise the value of, existing neighbouring green spaces including Pepys Park to the west, Twinkle Park to the east and Sayes Court Park to the south.

7. The type of uses on the safeguarded wharf should be restricted to those specified in the S106, to ensure compatibility with residential use nearby, in line with the Agent of Change principle.

~~6.~~8. Development must support conservation objectives by preserving and enhancing heritage assets and their setting, using history and heritage to inform the masterplan, incorporating heritage assets into the layout of the site in a positive way, and celebrating their significance through increased public access and opportunities for interpretation. This includes:

   a. The Grade II Listed Olympia Building which shall be retained, restored and regenerated to become an iconic landmark on the River Thames and a central feature of the development and a new cultural destination, with improved physical and/or visual links between Olympia Wharf, the riverfront and Sayes Court Park.
   b. Tudor naval storehouse, a Scheduled Ancient Monument of the highest significance, which shall be retained.
   c. The historic boundary wall (including Grade II listed river wall, Grade II listed entrance gates at the south western corner and Grade II listed wall on the eastern side) is characteristic of a Naval Shipyard and shall be retained and restored, preserving a semblance of the past with improved connectivity. New entrances to the site should be carefully sited and where the wall is lost, treatment should mark its former location.

Commented [SA204]: Respond to consultation – to refer to designated heritage asset

Commented [SA205]: To reflect S106 agreement

d. Other features such as the central basement, slipway 1, mast pond, double dry dock, slipways 4 & 5, John Evelyn House and Sayes Court Manor and Grade II* Listed Master Shipwrights on the adjacent site should be considered in the design of the site.

e. Provision of open spaces at key points on the water's edge including Royal Navy and Royal Caroline Squares to celebrate the sites archaeological remains and heritage features.

~~e.~~f. The Grade II* Listed St Nicholas Church located to the south east of the site.

~~7.~~9. Development proposals should explore options for removing the boundary wall to better integrate the site with its surrounding neighbourhoods. Careful consideration will need to be given to those elements of the wall that are heritage assets.

10. Transport for London, the Port of London Authority and the Marine Management Organisation should be consulted on development and design options.

11. Proposals should investigate and maximise opportunities for Decentralised Energy, including connections to SELCHP.

12. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk, improve biodiversity, maximise opportunities to improve riverside access and deliver a riverside buffer zone and deliver TE2100 plan actions.

13. Applicants should work in partnership with Thames Water to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied.

Commented [SA206]: Respond to consultation – to refer to designated heritage asset

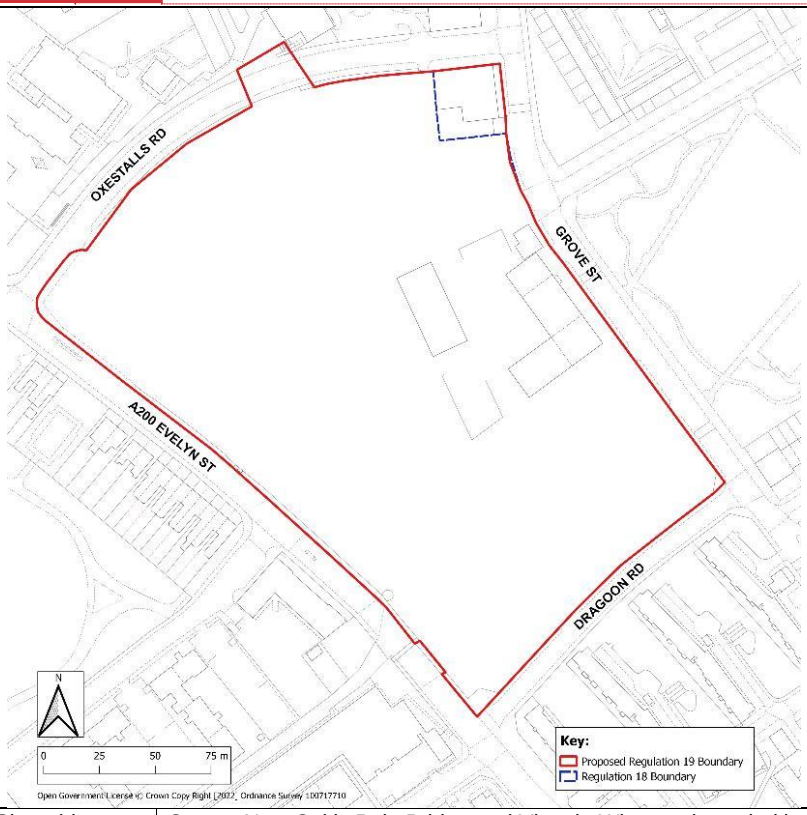
Commented [SA207]: Respond to consultation – to add Port of London Authority as a consultee

Commented [SA208]: Amended for clarity, to encourage decentralised energy

Commented [SA209]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA210]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

2 ~~Timber Yard, Deptford Wharves at Oxestalls Road~~ Deptford Landings Mixed-Use Employment Location (formerly known as Oxestalls Road) and Scott House



Site address:	Crown, New Celtic Pak, Bridge and Victoria Wharves bounded by Grove Street, Dragoon Road, Oxestalls Road, London, SE8
Site details:	Site size (ha): ~~4.62~~ 4.71, Setting: Urban, PTAL: In 2015: 1b-3, In 2021: 1b-4, In 2031: 1b-4, Ownership: Private, Current use: Industrial and residential.
How site was identified:	Lewisham Core Strategy (2011) and London SHLAA (2017)
Planning designations and site considerations:	Opportunity Area, Growth Node, Adjacent to Strategic Open Space, Mixed-Use Employment Location, Archaeological Priority Area, adjacent Thames Policy Area, Air Quality Management Area, Flood Zone 3~~a~~
Planning Status:	~~Outline~~ Hybrid application DC/15/092295 ~~for~~ for Oxestalls Road site granted in March 2016, reserved matters applications granted between February 2018 and March 2019 and Full application DC/19/113332 for Scott House granted in June 2021. Started construction, with 203 residential units in plot 2 completed in March 2020. Plot 6 will be starting construction by late 2022. Additional units are currently being considered for plots 1, 3 and 5.

Commented [SA211]: Respond to consultation – adjoining landowner requested that the site boundary be expanded to include the Scott House site

Commented [SA212]: Respond to consultation – landowner request that the site allocation name be changed to Deptford Landings

Commented [SA213]: Respond to consultation – to refer to the residential use that now exists on the site

Commented [SA214]: Factual update on designations

Commented [SA215]: Factual update and respond to consultation – on the progress made in redeveloping the site

Timeframe for delivery:	Years 1-5 Yes	Years 6-10 Yes	Years 11-15	Beyond 15 years
Indicative development capacity: Remaining net units to be delivered:	Net residential units: ~~1,600~~ 1,940 1,737		Gross non-residential floorspace: Employment ~~5,413~~ 11,784 Main town centre ~~5,000~~ 0	

Commented [SA216]: Capacities amended to reflect the planning consents granted for the site

Existing planning consent

DC/15/092295 ~~**outline**~~ **hybrid application** - The comprehensive mixed-use Phase 1-3 redevelopment of land bounded by Oxestalls Road, Grove Street, Dragoon Road and Evelyn Street (excluding Scott House, 185 Grove Street) for the demolition of existing buildings (excluding former Public House on Grove Street) to provide up to 10,413 square meters (GEA) non-residential floorspace comprising:

- (A1) Shops,
- (A2) Financial & Professional Services,
- (A3) Restaurants & Cafés,
- (A4) Drinking Establishments,
- (A5) Hot Food Takeaways,
- (B1) Business,
- (D1) Non-Residential Institutions,
- (D2) Assembly & Leisure uses and an energy centre,
- up to 1132 residential units in buildings ranging from 3 to 24 storeys in height,
- together with car and cycle parking, associated highway infrastructure,
- public realm works and provision of open space and
- detailed planning permission (~~Phase 1~~plots 1,2 and 3) for up to 562 residential units.

Reserved matters application~~s~~ **17/105015** ~~granted in February 2018~~ for Plot 4 to provide 251 residential units and 439m2 flexible non-residential floorspace (A1, A2, A3, A4, A5, B1, D1, D2)~~.~~.

Commented [SA217]: Factual updates and respond to consultation – to reflect the planning consents granted for the site.

Reserved matters application **19/110414** ~~granted in March 2019~~ for Plot 6 to provide 189 residential dwellings.

DC/19/113332 – Full application for the~~–~~ r~~R~~edevelopment of the existing building comprising partial façade retention to provide 137 residential dwellings, 824m2 employment floorspace (B1), 120m2 café (A3) at Scott House.

Site allocation

Comprehensive mixed-use redevelopment with compatible residential, commercial and main town centre uses. Public realm and environmental enhancements, including new public open space, along with new and improved walking and cycle routes.

Opportunities

The site comprises one existing residential property and a former industrial area encompassing a complete urban block bordered by Evelyn Street, Oxestalls Road, Grove Street and Dragoon Road as well as the corner plot occupied by Scott House. The site is situated in proximity to the Pepys Estate, Deptford Park and the River Thames, and the former route of the Surrey Canal runs through it. Planning permission for mixed-use redevelopment of the site has been granted, ~~and~~ construction has started and 203 units in

Commented [SA218]: Respond to consultation – to reflect that Scott House is now included within the site

Commented [SA219]: Factual update and respond to consultation – to reflect that part of the site has now been completed.

Phase 1 have been completed. Redevelopment and site intensification will provide a more optimal use of land and support local area regeneration, including provision of new housing and modern workspace. ~~-~~ Development will also enable public realm and environmental enhancements, with opportunities to re-instate the route of the former Surrey Canal and improve connections to Deptford Park and the River Thames.

Development requirements

1. Development must be delivered in accordance with a masterplan (as secured through the hybrid planning consent) to ensure coordination, phasing and balance of uses across the site, and in line with Policy DM3 (Masterplans and comprehensive development).
2. Provision of commercial floorspace in line with Policy ~~EC 6~~ EC7 (Mixed-use Employment Locations).
3. The site must be fully re-integrated with the surrounding street network to improve access and permeability in the local area, with enhanced walking and cycle connections between public spaces and the site's surrounding neighbourhoods. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors. Delivery of new and improved public realm and open space in accordance with a site-wide public realm strategy, including:
    a. Re-instatement of the route of the former Surrey Canal to form a high quality public open space linked to the wider walking and cycle network.
    b. Positive frontages along Evelyn Street, Oxestalls Road, Grove Street and Dragoon Road and other key routes, with active ground floor frontages where possible.

Development guidelines

1. Building heights should respond positively to the existing Victorian properties on the opposite side of Evelyn Street and the Victoria Pub and Scott House on Grove Street. Taller elements may be appropriate along Surrey Canal Way and opposite Pepys Park, to mark the significant of these open spaces and to enable more residents to benefit from outlook across them.
2. Tall buildings will be most appropriate on the corners of Evelyn Street/Oxestalls Road and Grove Street/Dragoon Road, forming corners for the urban block, aiding with legibility and wayfinding.
3. Development should respond positively to the social and built heritage of the site, whilst ensuring uses are well integrated with the surrounding communities and neighbourhoods. A range of materials should be used across the site to reflect the historic character, including the timber wharf, warehouses and Victorian Villas that existed on the site as well as to link with other buildings such as the Laban Centre.
4. Development should be designed to enable vehicular access from Grove Street and restrict access from Evelyn Street.
5. Development must address the future use of Blackhorse Bridge over the former Surrey Canal.
6. Development should enhance connections and legibility through the site, with routes running between Evelyn Street and Grove Street, and by creating a permeable streetscape with improved walking and cycle links to Evelyn Street (including the Cycle

Commented [SA220]: Respond to consultation – landowner request to acknowledge hybrid consent for the site

Commented [SA221]: Amended for clarity and to aid policy implementation

Commented [SA222]: Factual update – to reflect new policy numbers in Regulation 19 plan

Super Highway), Pepys Estate, Pepys Park and Deptford Park to the Thames Riverfront.

7. Proposals should investigate and maximise opportunities for Decentralised Energy, including connections to SELCHP.

8. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

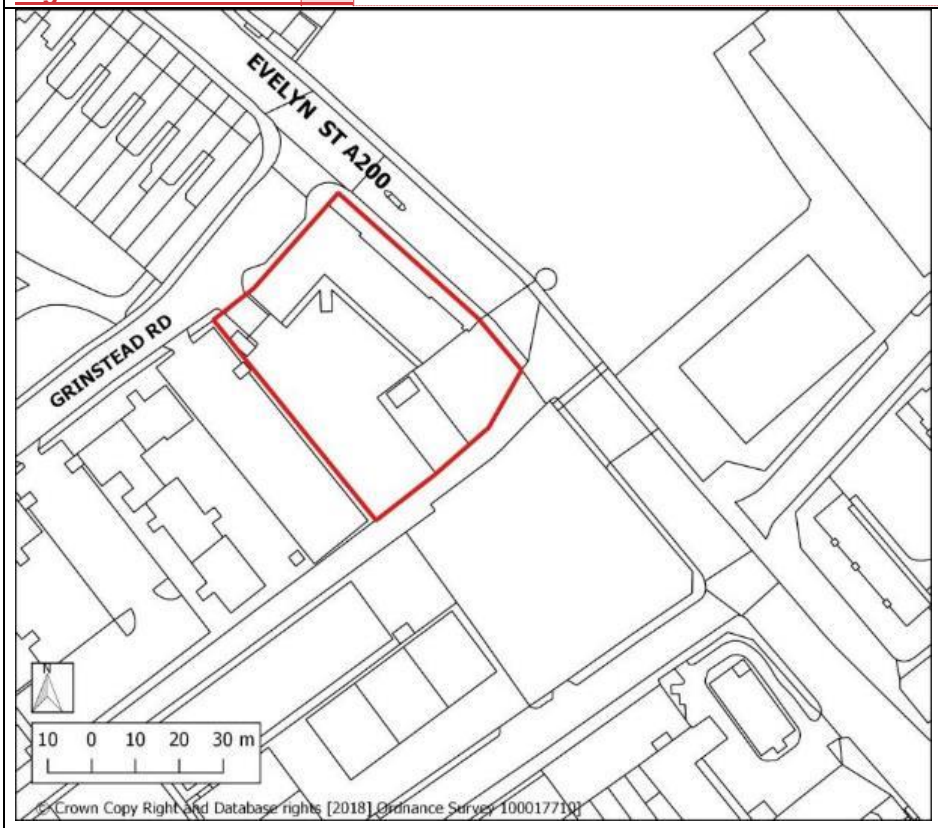
9. Applicants should work in partnership with Thames Water to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied.

Commented [SA223]: Amended for clarity, to encourage decentralised energy

Commented [SA224]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA225]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~4~~ 3 Evelyn Court ~~at Surrey Canal Strategic Industrial Location~~Locally Significant Industrial Site



Site address:	Evelyn Court, Grinstead Road, London, SE8 5AD			
Site details:	Site size (ha): 0.27, Setting: Urban, PTAL: In 2015: 2, In 2021: 2, In 2031: 2, Ownership: Mixed, public and private, Current use: Employment			
How site was identified:	London SHLAA (2017) and Lewisham Call for Sites (2015 and 2018)			
Planning designations and site considerations:	Opportunity Area, Appropriate Location for Tall Buildings, adjacent to Strategic Industrial Location ~~(to be de-designated)~~, Archaeological Priority Area, Thames Policy Area, Creative Enterprise Zone, Air Quality Management Area, Flood Zone 3~~a~~			
Planning Status:	Prior approval applications DC/14/088665 and DC/14/089442 granted in October and December 2014. Pre-application.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~38~~ 102		Gross non-residential floorspace: Employment ~~1,310~~ 2,381 Main town centre 0	

Commented [SA226]: Respond to consultation - Site allocation title amended to reflect change in employment designation

Commented [SA227]: Factual update on designations

Commented [SA228]: Factual update – on the progress made in redeveloping the site

Commented [SA229]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Existing planning consent

DC/14/88665 and DC/14/89442: Prior Approval for the change of use from offices (B1a) at Evelyn Court, Grinstead Road to residential (C3).

Site allocation

Comprehensive employment-led redevelopment on this ~~, now~~ re-designated ~~as~~ Locally Significant Industrial Site. Co-location of compatible commercial and residential uses. Public realm enhancements, including improved connections to Deptford Park.

Opportunities

The site forms the north-eastern end of the Surrey Canal Road Strategic Industrial Location, 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 site also includes Parker House in different ownership. By re-designating the site from SIL to LSIS, r~~R~~edevelopment and site intensification, along with the co-location of commercial and other uses, will provide a more optimal use of land and ensure the site maintains its employment function. Replacement provision of industrial land will be made at the Bermondsey Dive Under site. ~~.~~Development will also enable public realm enhancements, including improved access to Deptford Park from the ~~Timber Yard~~Deptford Landings site, on the opposite side of Evelyn Street.

Development requirements

1. Landowners must work in partnership and d~~D~~evelopment must take account of the existing prior approvals and be delivered in accordance with a masterplan, to ensure coordination and phasing in the co-location of uses across the site, including on the plots currently occupied by Evelyn Court and Parker House, and in line with Policy DM3 (Masterplans and comprehensive development).
2. Development must not result in the net loss of industrial capacity, or compromise the function~~al integrity~~ of the ~~employment location~~LSIS, in line with Policy ~~EC2~~ EC6 ~~(Protecting employment sites and delivering new workspace~~(Locally Significant Industrial Sites).

3. Positive frontages along Evelyn Street and Grinstead Road.

~~3.~~4. New and improved public realm in accordance with a site-wide public realm strategy, including improved connections between The ~~Timber Yard~~Deptford Landings development~~,~~ at Oxestalls Road, ~~and~~ Deptford Park and along the route of the former Surrey Canal and to facilitate the delivery of Cycleway 4.

Development guidelines

1. Whilst replacement provision of SIL land will be made at the Bermondsey Dive Under site, development should be demonstrably employment-led to ensure the long-term viability of commercial uses at the site and wider SIL area. Further details on calculating industrial capacity are set out in with Policy EC6 (Locally Significant Industrial Sites).
2. Development should be designed to respond positively with the ~~,~~development at The ~~Timber Yard~~Deptford Landings, Oxestalls Road MEL.
3. Non-employment uses, including residential uses, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses, including

Commented [SA230]: To reflect the change in employment designation.

Commented [SA231]: Amended for clarity to note different plots and land ownership across the site.

Commented [SA232]: To reflect the change in employment designation.

Commented [SA233]: Factual update – to reflect correct site name

Commented [SA234]: Amended for clarity and to aid policy implementation and to acknowledge the prior approvals on this site.

Commented [SA235]: Factual update – to reflect new policy numbers and titles in Regulation 19 plan and the change in employment designation

Commented [SA236]: Factual update – to reflect the correct site name

Commented [SA237]: Respond to consultation – request to make reference to specific cycleway

Commented [SA238]: Amended for clarity and to aid policy implementation

Commented [SA239]: Factual update – to reflect the correct name for the site.

uses at the adjacent Deptford Trading Estate and in line with the Agent of Change principle.

4. The bulk, massing, scale and height of the buildings should respond positively to the existing residential properties along Grinstead Road and the three to four storey terraced properties along Evelyn Street, along with the ~~development~~ tall buildings on the opposite side of Evelyn Street (~~Timber Yard~~Deptford Landings, Oxestalls Road MEL).

5. Landscaping should be designed as an integral part of the overall development, with an enhanced relationship with Deptford Park and enhancements to the amenity of the site, focused around an enhanced walking/cycle route running along the site boundary~~, also taking into account the proposed cycle superhighway on Evelyn Street~~. Development should not result in a reduction in existing footway or carriageway space.

~~5.~~6. Development should be designed to retain existing vehicular access onto Grinstead Road.

7. The demolition of the existing office block will be supported to enable the delivery of high quality, purpose built housing as a component of an employment-led mixed-use scheme.

8. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

9. Applicants should work in partnership with Thames Water and engage with them early to manage surface water and divert existing sewers where applicable. New connections into the Evelyn Street trunk sewer will not be allowed.

Commented [SA240]: Amended for clarity and to aid policy implementation

Commented [SA241]: Respond to consultation – to reflect that the site is suitable for tall buildings

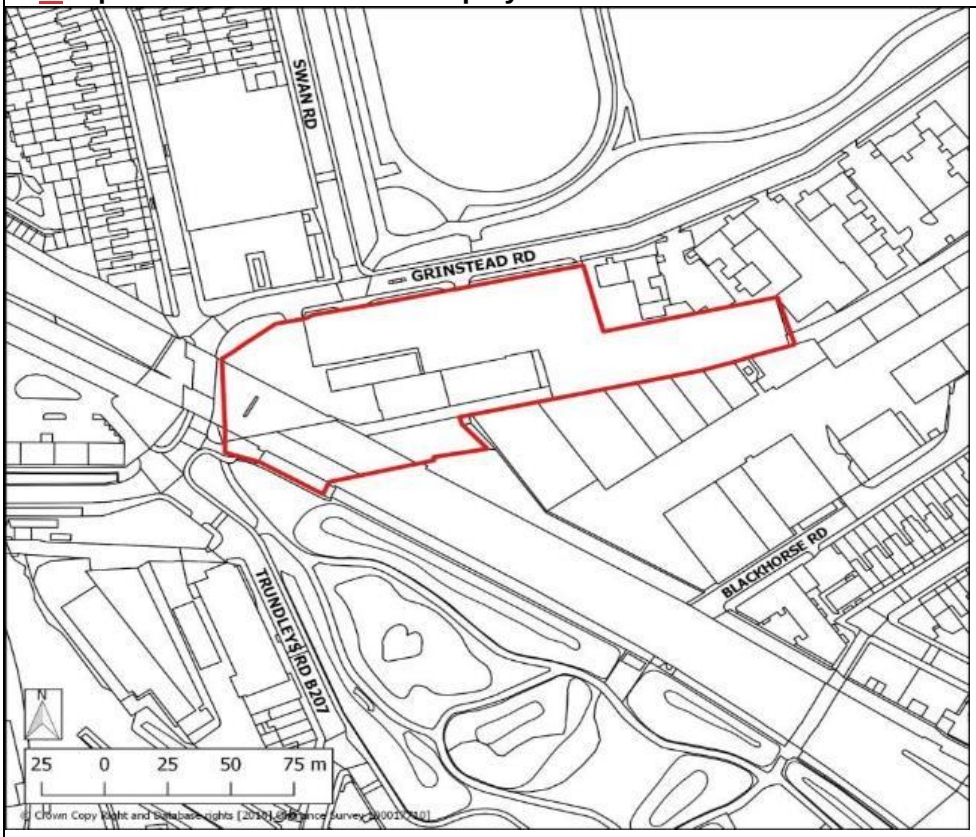
Commented [SA242]: Factual updates – to reflect correct names for sites

Commented [SA243]: Respond to consultation – request for no reduction in footway and carriageway.

Commented [SA244]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA245]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~5~~ 4 Neptune Wharf Mixed-Use Employment Location



Site address:	Neptune Works, Parkside House, Grinstead Road, SE8 5B			
Site details:	Site size (ha): 1.14, Setting: Urban, PTAL: In 2015: 2, In 2021: 2, In 2031: 2, Ownership: Private, Current use: Industrial			
How site was identified:	Site Allocations Local Plan (2013) and London SHLAA (2017)			
Planning designations and site considerations:	Opportunity Area, Growth Node, Appropriate Location for Tall Buildings Mixed-Use Employment Location, Archaeological Priority Area, adjacent to Strategic Open Space~~Public Open Space~~, adjacent to Site of Importance for Nature Conservation, Creative Enterprise Zone, Air Quality Management Area, Flood Zone 3~~a~~			
Planning Status:	Full application DC/10/075331 granted in March 2012. Started construction.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: 199		Gross non-residential floorspace: Employment 0 Main town centre 1,973	

Commented [SA246]: Factual update on designations

Commented [SA247]: Capacities remain the same as Regulation 18 plan

Existing planning consent

DC/10/075331: The demolition of the existing buildings at Neptune Works, Grinstead Road SE8 and the phased redevelopment of the site to provide 6 blocks and 10 mews houses between 3 and 12 storeys, providing 199 residential units comprising 70 one bedroom, 100 two bedroom, 19 three bedroom and 10 four bedroom units; 1,973 m² of non-residential floorspace, comprising 1,874 m² of flexible B1/A1/A2 office space and 99 m² of café /bike repair shop uses fronting a public piazza and public realm, which links Deptford Park and Folkestone Gardens by the opening up the existing railway viaducts on the western edge of the site; parking for up to 276 cycle spaces, 10 motorbike/scooter spaces and 60 vehicular spaces including 7 disabled spaces.

Site allocation

Comprehensive mixed-use redevelopment with compatible commercial, residential and main town centre uses. Public realm enhancements including new public open space along with improved walking and cycle links.

Opportunities

The site comprises a Mixed-use Employment Location on Grinstead Road, which is situated between Deptford Park and Folkestone Gardens. Parts of the site have been cleared including land around the former Parkside House office block and Neptune Chemical Works, which were destroyed by fire. The remainder of the site is occupied by low intensity industrial uses, with a railway viaduct running along its western boundary. The land will be brought back into active use through site redevelopment, with the delivery of high quality workspace that forms part of a new employment-led mixed use quarter, together with Trundleys Road and Apollo Business Centre SIL sites. Development will also enable public realm enhancements, including new and improved walking and cycle connections in the local area. Access to Deptford Park and Folkestone Gardens will be enhanced, with links created by opening up the railway viaduct.

Development requirements

1. Provision of commercial floorspace in line with Policy ~~EC 6~~EC7 (Mixed-use Employment Locations).
2. New and improved public realm in accordance with a site-wide public realm strategy, including:
    a. Safe and legible east-west walking routes and connections through the railway arches from Folkestone Gardens to Grinstead Road,
    b. 'Future proofing' for the Canal Approach cycle lane to the rear of the site.
3. Positive frontages at routes to and along Grinstead Road.
4. A new vehicle entrance on the eastern side of the site to make use of the Old Tow Path.
5. Development proposals must protect and seek to enhance green infrastructure, including the SINC.

Commented [SA248]: Factual update – to reflect new policy numbers in Regulation 19 plan

Development guidelines

1. The rhythm of the frontage to Grinstead Road should relate well to Deptford Park, with development maximising the amenity provided by the park and active ground floor uses to improve the public realm and townscape along Grinstead Road.

2. Development should be designed to enhance safety, including by sensitively integrated external lighting and layout to allow for natural surveillance of new public realm, particularly around the railway arches, along Grinstead Road, along the Old Tow Path and within communal courtyards.

3. The design of development should respond positively to Deptford Park, the neighbouring residential buildings, Sir Francis Drake Primary School and Old Tow Path. The tallest building point should form a key landmark that is clearly visible from south of the viaduct and is located at the western edge of the site, along the railway. Two storeys of commercial floorspace should be integrated, in order to lift the residential elements above the railway. Building heights should drop down along Grinstead Road adjacent to the park, ensuring adequate daylight is provided to the existing neighbouring buildings.

4. The design of the development should allow views from Folkestone Gardens and Deptford Park, and across to Canary Wharf.

5. Proposals should investigate and maximise opportunities for Decentralised Energy, including connections to SELCHP.

6. Applicants should consult and work in partnership with Network Rail, and landowners as appropriate, to optimise the use of the railway arches and create active frontages whilst retaining an appropriate clear zone.

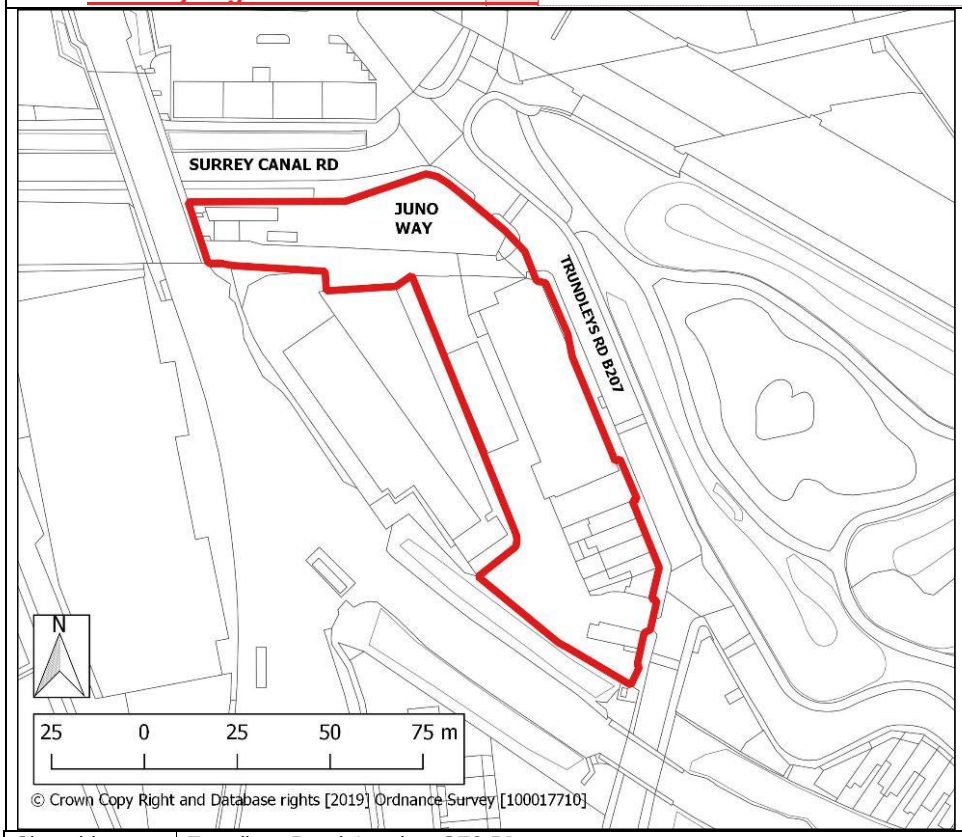
7. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

8. Applicants should work in partnership with Thames Water to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied.

Commented [SA249]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA250]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~6~~ 5 ~~Strategic Industrial Land (SIL) at~~ Surrey Canal Road and Trundleys Road Locally Significant Industrial Site



Site address:	Trundleys Road, London, SE8 5J			
Site details:	**Site size (ha):** 0.55, **Setting:** Urban, **PTAL:** In 2015: 1a-2, In 2021: 1a-2, In 2031: 1a-2, **Ownership:** Private, **Current use:** Industrial			
How site was identified:	London SHLAA (2017) and Lewisham Call for Sites (2018)			
Planning designations and site considerations:	Opportunity Area, Growth Node, Appropriate Location for Tall Buildings, ~~Strategic Industrial Land (to be de-designated)~~, Archaeological Priority Area, adjacent Site of Importance for Nature Conservation, Creative Enterprise Zone, Air Quality Management Area, Flood Zone 3~~a~~, within 30m of electricity cable, adjacent to Strategic Open Space.			
Planning Status:	~~None~~ **DC/20/117966** granted a resolution to approve in November 2021. S96a application **DC/22/127348** granted consent in October 2022.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10 Yes	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~189~~ 274		Gross non-residential floorspace: Employment ~~2,400~~ 2,890 Main town centre 0	

Commented [SA251]: The site allocation name has changed to reflect that the site has been de-designated from SIL and re-designated as LSIS

Commented [SA252]: Factual update on designations

Commented [SA253]: Factual update – on the progress made in redeveloping the site

Commented [SA254]: Capacities amended to reflect the planning consent granted for the site

Existing planning consent

DC/20/117966 – Full application for the d~~D~~emolition of existing buildings and redevelopment of the site comprising flexible commercial floorspace (Class E/B2/B8), 58 residential units and 393 purpose built student accommodation at 164-196 Trundleys Road and 1-9 Sanford Street.

DC/20/118229 – S96a application for an increase of 9 student rooms, from 393 to 402 units, change in clusters of units, change increase in the number of studio rooms, increase in shared amenity space and increase in cycle car parking spaces.

Site allocation

Comprehensive employment-led redevelopment on this re-designated Locally Significant Industrial Site. Co-location of compatible commercial, residential and~~,~~ purpose built student accommodation ~~and complementary main town centre uses~~.

Opportunities

The site is situated within the Surrey Canal Road Strategic Industrial Location, on the south side of Surrey Canal Road and adjacent to Folkestone Gardens. The site functions in isolation of the remaining SIL land by virtue of a railway line that creates a physical barrier at the western edge. It is occupied by a mix of industrial units and associated yard space, a scrap yard, and a small terrace of retail uses and six residential ~~uses~~ units at the southernmost end along Trundleys Road. 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 Apollo Business Centre SIL and Neptune Wharf MEL sites. Replacement provision of SIL land will be made at the Bermondsey Dive Under site. Development will also enable public realm enhancements to improve the walking and cycle environment as well as the amenity of Folkestone Gardens and neighbouring residential areas.

Development requirements

1. ~~Phased d~~Development ~~must be delivered~~ Landowners must work in partnership and in accordance with a masterplan, to ensure coordination in the co-location, phasing and balance of uses across the site including both the Trundleys Road and Juno Way parcels of land, in line with Policy DM3 (Masterplans and comprehensive development)~~.~~
2. Development must not result in the net loss of industrial capacity, or compromise the function~~al integrity~~ of the ~~employment location~~LSIS, in line with Policy ~~EC2~~ EC6~~(Protecting employment sites and delivering new workspace)~~ (Locally Significant Industrial Sites).
3. Positive frontages along Trundleys Road and Surrey ~~canal~~ Canal Road.
4. New and improved public realm in accordance with a site-wide public realm strategy. This includes enhancements along Trundleys Road and Surrey canal Road to improve the walking and cycle environment, along with access to Folkestone Gardens and Deptford Park and to facilitate the delivery of Cycleway 10.
5. Development proposals mist protect and seek to enhance green infrastructure, including the SINC adjacent to the site.

Development guidelines

Commented [SA255]: Factual update – to reflect panning consent granted for the site

Commented [SA256]: To reflect the change in employment designation.

Commented [SA257]: Factual update – to reflect the planning consent granted for the site

Commented [SA258]: Factual update – to reflect existing uses on the site

Commented [SA259]: Amended for clarity and to aid policy implementation and
Respond to consultation - request by landowner to mention both plots of land

Commented [SA260]: Factual update – to reflect new policy numbers and titles in Regulation 19 plan

Commented [SA261]: Respond to consultation – request to make reference to cycle route.

1. Whilst replacement provision of SIL land will be made at the Bermondsey Dive Under site, development should be demonstrably employment-led to ensure the long-term viability of commercial uses at the site and wider SIL area.

2. Development will be expected to make provision for high quality and flexibly designed employment floorspace and units that are well-suited to the operational requirements of commercial and industrial occupiers. Particular consideration will need to be given to the development's functional and visual interface with the public realm and any non-commercial elements.

3. Non-employment uses, including residential uses and purpose built student accommodation, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses.

4. Opportunities for shared amenity space, capable of being used throughout the day, should be investigated.

5. There is an existing rail substation located outside site's western boundary, south of Surrey Canal Road. Views to the west over the substation may benefit from mature planting around the boundary of the site.

6. Proposals ~~must~~ should investigate options to improve walking and cycle connections to Folkestone Gardens. This should include consideration of new or enhanced crossing facilities on Trundleys Road. Development should not result in a reduction in exiting footway and carriageway space.

7. The scale, massing and height of buildings should positively respond to Folkestone Gardens, including consideration of impacts on sunlight onto the park.

8. Development should be designed to enhance safety, including by sensitively integrated external lighting and layout to allow for natural surveillance of public realm, particularly around the railway bridges and walkways.

9. Development should be designed with reference to, and seek to enhance, the industrial character of the site and its surrounds, particularly around the railway viaduct.

10. Proposals should investigate and maximise opportunities for Decentralised Energy, including connections to SELCHP.

11. Network Rail should be consulted on development and design options.

12. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

13. Applicants should work in partnership with Thames Water to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied.

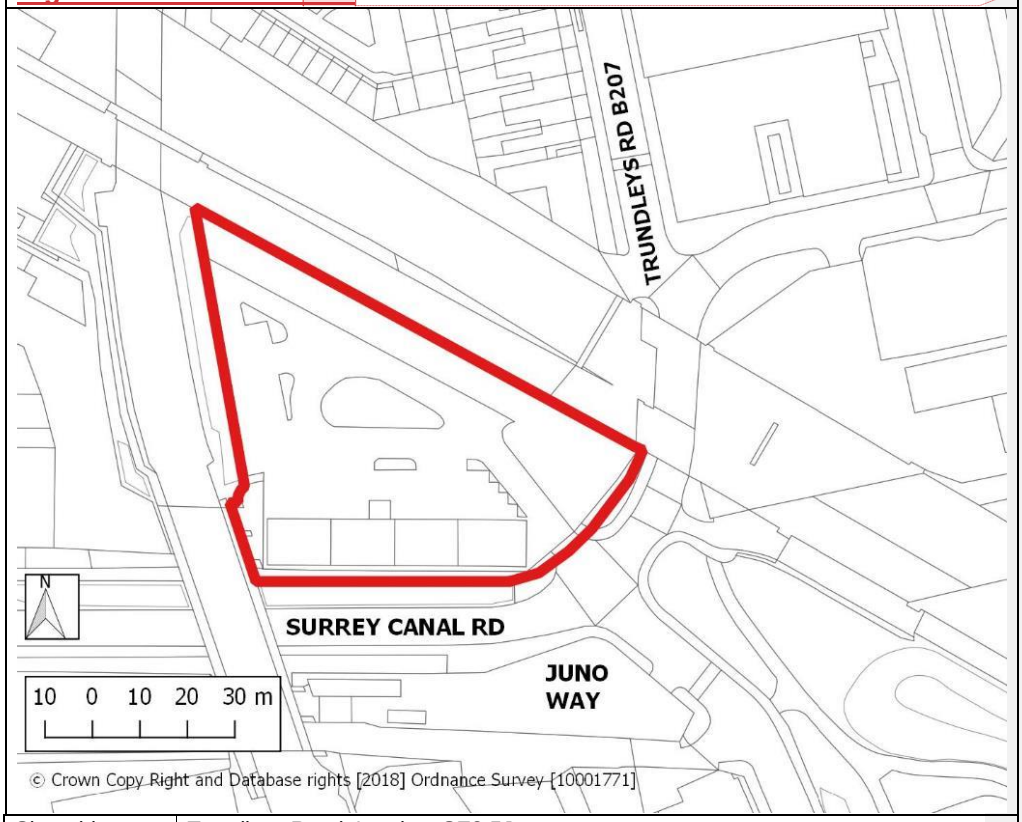
Commented [SA262]: Factual update – to reflect the planning consent granted for the site

Commented [SA263]: Respond to consultation – request that reference is made to no reduction of footway or carriageway

Commented [SA264]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA265]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~7~~ 6 ~~Strategic Industrial Land (SIL) at~~ Apollo Business Centre Locally Significant Industrial Site



Site address:	Trundleys Road, London, SE8 5J			
Site details:	Site size (ha): 0.42, Setting: Urban, PTAL: In 2015: 0-2, In 2021: 0-2, In 2031: 0-2, Ownership: Mixed, public and private, Current use: Industrial			
How site was identified:	London SHLAA (2017) and Strategic Planning Team (2019)			
Planning designations and site considerations:	Opportunity Area, Growth Node, Appropriate Location for Tall Buildings, ~~Strategic Industrial Land (to be de designated),~~ Archaeological Priority Area, Creative Enterprise Zone, Air Quality Management Area, Flood Zone 3, within 30m of electricity cable			
Planning Status:	None			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10 ~~Yes~~	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~59~~ 98		Gross non-residential floorspace: Employment ~~2,037~~ 3,396 Main town centre 0	

Commented [SA266]: Site allocation title amended to reflect change to employment designation

Commented [SA267]: Factual update on designations

Commented [SA268]: Factual update – providing additional details on flood risk

Commented [SA269]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Site allocation

Comprehensive employment-led redevelopment on this re-designated Locally Significant Industrial Site. Co-location of compatible commercial and~~,~~ residential ~~and complementary main town centre~~ uses.

Opportunities

The site is situated within the Surrey Canal Road Strategic Industrial Location, north of Surrey Canal Road and in proximity to Folkestone Gardens. 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 Trundlely~~s~~ Road SIL and Neptune Wharf MEL sites. Replacement provision of employment land will be made at the Bermondsey Dive Under site. Development will also enable public realm enhancements to improve the walking and cycle environment, along with the amenity of Folkestone Gardens and neighbouring residential areas

Development requirements

1. Development must be delivered in accordance with a masterplan to ensure coordination in the co-location, phasing and balance ~~-~~of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development).
2. Development must not result in the net loss of industrial capacity, or compromise the function~~al integrity~~ of the ~~employment location~~LSIS, in line with Policy ~~EC2~~ EC6 ~~(Protecting employment sites and delivering new workspace)~~ (Locally Significant Industrial Sites).
3. There is an existing waste use at the site (Southwark Metals). Development proposals must address this use in accordance with Local Plan policy SD12 (Reducing and sustainably managing waste) and London Plan policy SI9 (Safeguarded waste sites).
4. Positive frontages along Surrey Canal Road and across from the railway arches.
5. New and improved public realm in accordance with a site-wide public realm strategy. This includes enhancements along Surrey Canal Road to improve the walking and cycle environment, along with access to ~~-~~Folkestone Gardens and to facilitate the delivery of Cycleway 10.

Development guidelines

1. Whilst replacement provision of SIL land will be made at the Bermondsey Dive Under site, development should be demonstrably employment-led to ensure the long-term viability of commercial uses at the site and wider SIL area.
2. Development will be expected to make provision for high quality and flexibly designed employment floorspace and units that are well-suited to the operational requirements of commercial and industrial occupiers. Particular consideration will need to be given to the development's functional and visual interface with the public realm and any non-commercial elements.
3. Non-employment uses, including residential uses, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses

Commented [SA270]: To reflect the change in employment designation.

Commented [SA271]: Amended for clarity and to aid policy implementation

Commented [SA272]: Factual update – to reflect new policy numbers and titles in Regulation 19 plan

Commented [SA273]: Amended for clarity and to aid policy implementation

Commented [SA274]: Respond to consultation – request to reference a specific cycleway

4. Applicants should consult and work in partnership with Network Rail, and landowners as appropriate, to optimise the use of the railway arches and create active frontages whilst retaining an appropriate clear zone. Proposals should investigate options for improved walking and cycle connections to Folkestone Gardens. This should include consideration of new or enhanced crossing facilities on Surrey Canal Road / Trundleys Road.

5. The design of development (including the scale, massing and height of buildings) should respond positively to Folkestone Gardens.

6. Proposals should investigate options to improve walking and cycle connections to Folkestone Gardens. This should include consideration of new or enhanced crossing facilities on Trundleys Road. Development should not result in a reduction in exiting footway and carriageway space.

~~5.~~7. Development should be designed to enhance safety, including by sensitively integrated external lighting and layout to allow for natural surveillance of public realm, particularly around the railway bridges and walkways.

~~6.~~8. Development should be designed with reference to, and seek to enhance, the industrial character of the site and its surrounds.

9. Proposals should investigate and maximise opportunities for Decentralised Energy, including connections to SELCHP.

10. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

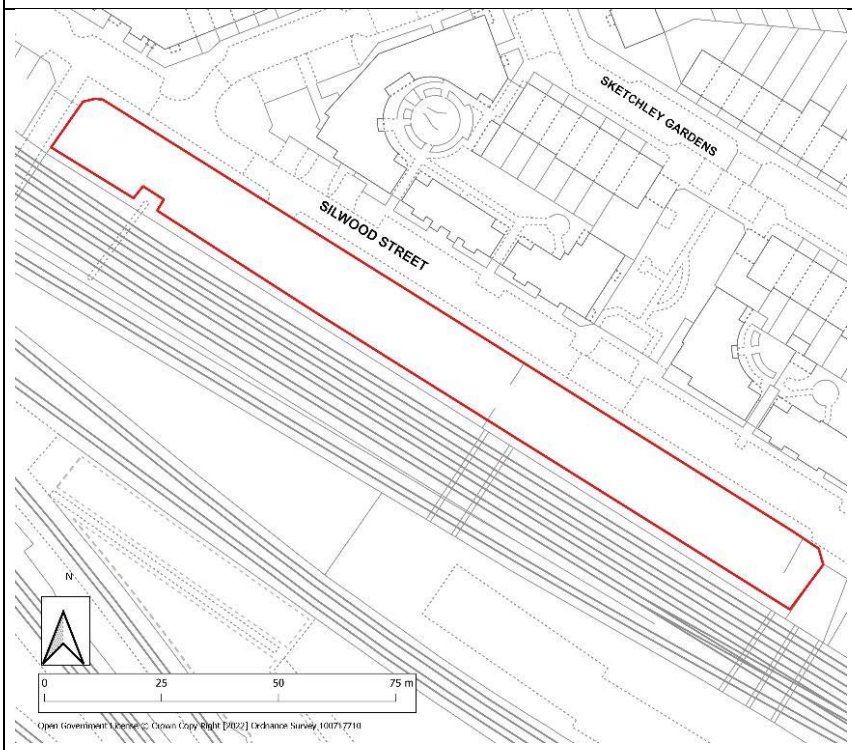
11. Applicants should work in partnership with Thames Water and engage with them early to manage surface water, survey the site for existing connections and divert existing sewers where applicable.

Commented [SA275]: Respond to consultation – request to refer to cycle routes and no reduction in footway and carriageway.

Commented [SA276]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA277]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

7 Silwood Street



Site address:	Silwood Street, London, SE16			
Site details:	Site size (ha): 0.25, Setting: Urban, PTAL: In 2015: ~~0~~ 2-3, In 2021: ~~0~~ 3, In 2031: ~~0~~ 3, Ownership: Mixed, public and private, Current use: Vacant			
How site was identified:	Strategic Planning Team (2022)			
Planning designations and site considerations:	Opportunity Area, ~~Strategic Industrial Land (to be designated)~~, Archaeological Priority Area, Creative Enterprise Zone, Air Quality Management Area~~,~~			
Planning Status:	Full ~~planning consent~~application DC/20/116783 was granted in March 2021.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: 61		Gross non-residential floorspace: Employment 1,313 Main town centre ~~0~~ 200	

Commented [SA278]: New site allocation to reflect recent planning consent

Commented [SA279]: Factual update on designations

Commented [SA280]: Factual update – on the progress made in redeveloping the site

Commented [SA281]: Capacities amended to reflect the planning consent granted for the site

Existing planning consent

DC/20/116783: Construction of mixed use development comprising four blocks with building heights of five to nine storeys to provide 1,616m2 of flexible light industrial/office/retail/café/community floorspace (use classes B1a, B1c, A1, A3, D1) at ground and first floors with 61 residential units on the upper floors at land at Silwood Street.

Site allocation

Mixed-use development with flexible commercial uses and residential uses.

Opportunities

The site is situated on a linear site to the north of an elevated railway track and south of Silwood Street. Residential properties are located on the opposite side of Silwood Street. Redevelopment of this vacant site will provide the opportunity to enhance local amenity and provide new residential units as well as a range of commercial uses.

Development requirements

1. Provision of commercial and town centre floorspace in line with Policy EC7 (Mixed-use Employment Locations).
2. New and improved public realm in accordance with a site-wide public realm strategy, including:
    a. Improvements to Silwood Street
    b. New public space at corner of Silwood Street and Bolina Road
3. Positive frontages and along Silwood Street and Bolina Road
4. Make provision for the future use and servicing of the Railway Arches to the rear of the site.

Development guidelines

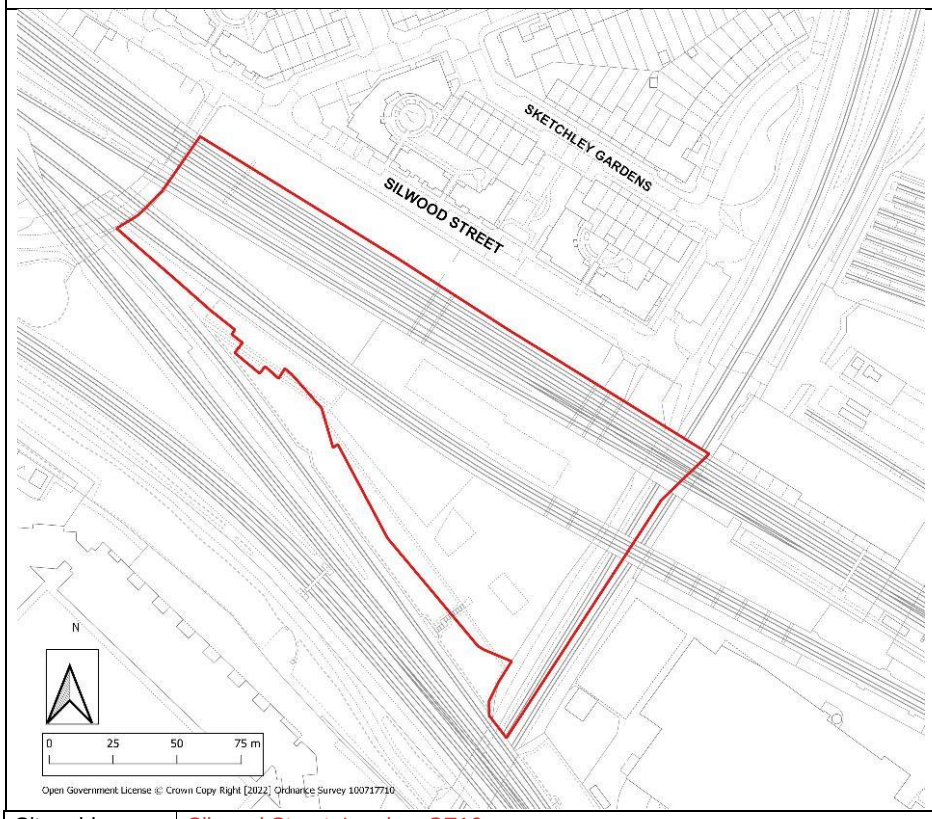
1. Development should ensure the long-term viability of the commercial uses at the site.
2. Development will be expected to make provision for high quality and flexibly designed employment floorspace and units that are well-suited to the operational requirements of commercial and industrial occupiers. Particular consideration will need to be given to the development's functional and visual interface with the residential properties located on the opposite side of Silwood Street.

~~1.~~3. Development should seek to enhance the~~-~~ amenity for all site users, and provide ~~-~~safe and convenient site access. This will require careful consideration of the operational requirements of potential future commercial uses.

4. The scale and massing of the development should respond positively to the neighbouring residential along Silwood Street.

~~2.~~5. Applicants should consult and work in partnership with Network Rail.

8 Bermondsey Dive Under



Site address:	Silwood Street, London, SE16			
Site details:	Site size (ha): 1.88, Setting: Urban, PTAL: In 2015: 0-2, In 2021: 0-2, In 2031: 0-2, Ownership: Mixed, public and private, Current use: Vacant			
How site was identified:	Strategic Planning Team (2022)			
Planning designations and site considerations:	Opportunity Area, Strategic Industrial Land (to be designated), Archaeological Priority Area, Creative Enterprise Zone, Air Quality Management Area~~,~~ Strategic Open Space			
Planning Status:	None			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10 Yes	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: 0		Gross non-residential floorspace: Employment 5,264 Main town centre 0	

Commented [SA282]: New site allocation with new SIL designated to allow for the de-designation of some sites in Surrey Canal SIL and to provide flexibility for arches by designating them as LSIS

Commented [SA283]: Factual update on designations

Site allocation

Industrial and commercial uses on land designated as Strategic Industrial Location and Locally Significant Industrial Site.

Opportunities

The site is situated to the north of the Surrey Canal Road Strategic Industrial Location and south of Silwood Street. The presence of elevated railway tracks that run through and surround the site, together with SELCHP immediately to the east of the site, make it a wholly unsuitable site for residential development. The site is currently owned by Network Rail but is no longer in operational use. Redevelopment of the land will provide the opportunity to enhance local amenity and provide new industrial land designated as Strategic Industrial Land and Locally Significant Industrial Land. This in turn will allow the de-designated of some sites within the existing Surrey Canal SIL for mixed use development. There are also arches beneath the railway that are currently vacant and in need of significant repair. 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 Locally Significant Industrial Location, to deliver high quality, small scale workspace for a range of industrial and commercial uses.

Development requirements

1. Development must provide substitute industrial capacity, to enable the re-configuration of the Surrey Canal Road SIL and the release of SIL at Apollo Business Centre, Trundleys Road and Evelyn Court.
2. Development proposals within the SIL part of the site will be supported where the uses fall within the industrial-type activities specified by the London Plan.
3. Development must not adversely impact on the function or effectiveness of the SIL to accommodate commercial and industrial uses or their ability to function on a 24-hour basis, in line with Policy EC5 (Strategic Industrial Locations).
4. Industrial uses will be limited to those suited to the site, taking account of the nature of the site. Uses requiring large services vehicles will not be permitted due to the restricted access of the site.
5. Development proposals within the LSIS part of the site will be supported where the uses include Class E(g) light industrial, Class B industrial, small scale Class B8 storage and distribution and related Sui Generis uses; where they can be accommodated within the confines of the railway arches and can contribute to their viability.
6. Development must not adversely impact on the function or effectiveness of the LSIS to accommodate commercial and industrial uses, in line with Policy EC6 (Locally Significant Industrial Sites).

Development guidelines

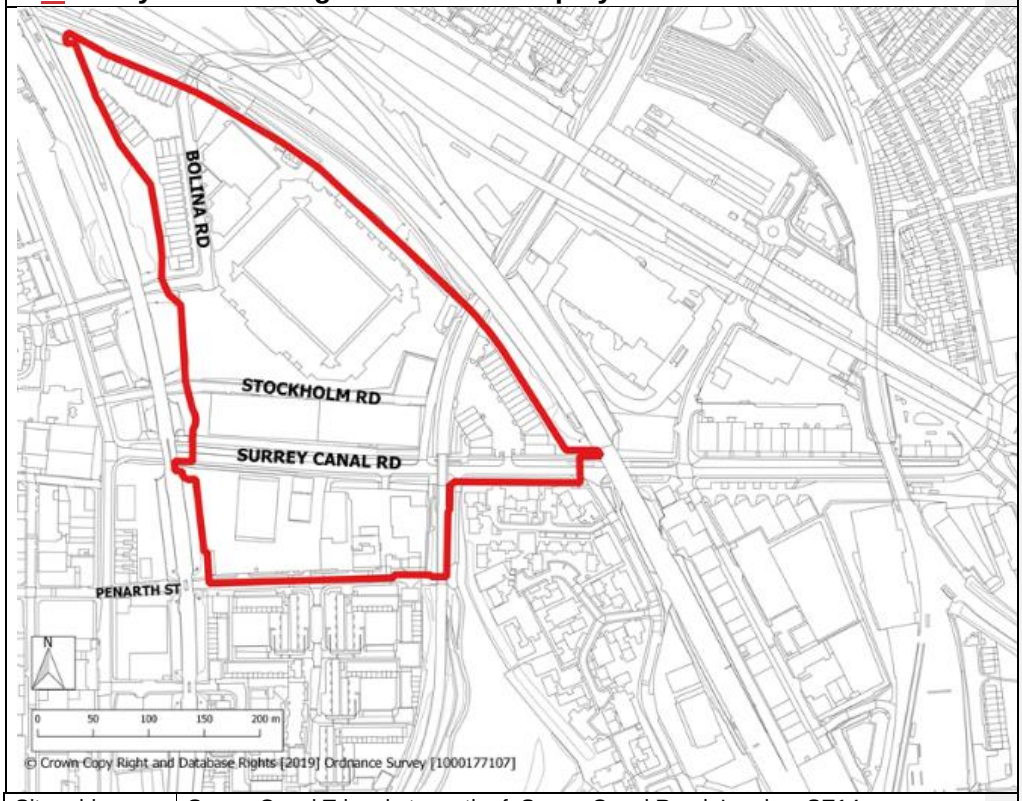
1. Development should ensure the long-term viability of industrial and commercial uses at the site.
2. Development will be expected to make provision for high quality and flexibly designed employment floorspace and units that are well-suited to the operational requirements of commercial and industrial occupiers. Particular consideration will need to be given

to the development's functional and visual interface with the residential properties located along Silwood Street.

~~1.~~3. Development should seek to enhance the~~-~~ amenity for all site users, and provide ~~-~~safe and convenient site access. This will require careful consideration of the operational requirements of potential future employment uses and ensure coordination of industrial and commercial uses across the SIL and LSIS.

4. Applicants should consult and work in partnership with Network Rail, and landowners as appropriate, to optimise the use of the railway arches and create active frontages whilst retaining an appropriate clear zone.

~~8~~ 9 Surrey Canal Triangle Mixed-Use Employment Location



Site address:	Surrey Canal Triangle to north of, Surrey Canal Road, London, SE14			
Site details:	Site size (ha): 10.59, Setting: Urban, PTAL: In 2015: 0-1b, In 2021: 0-1b, In 2031: 0-1b, Ownership: Private, Current use: Football Stadium, Industrial			
How site was identified:	Lewisham Core Strategy (2011), London SHLAA (2017) and Lewisham Call for Sites (2018)			
Planning designations and site considerations:	Opportunity Area, Growth ~~a~~Node, Mixed-Use Employment Location, Archaeological Priority Area, Site of Importance for Nature Conservation, ~~South-east London Green Chain Area,~~ ~~Public Open Space~~adjacent to Strategic Open Space, adjacent to Strategic Industrial Land, Creative Enterprise Zone, Air Quality Management Area, Flood Zone 3~~a~~, within 30m of electricity cable			
Planning Status:	~~Full Application DC/11/076357 granted in March 2012~~. Surrey Canal Triangle SPD was adopted in January 2020. Full Application **DC/20/119706** granted a resolution to approve in January 2022.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10 Yes	Years 11-15 Yes	Beyond 15 years Yes
Indicative development capacity:	Net residential units: ~~3,600~~ 4,089		Gross non-residential floorspace: Employment ~~15,000~~ 14253 Main town centre ~~32,000~~ 46469	

Commented [SA284]: Factual update on designations

Commented [SA285]: Factual update – on the progress made in redeveloping the site

Commented [SA286]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Existing planning consent

DC/11/076357 Outline permission was approved in March 2012 for revisions for the comprehensive, phased mixed use development for up to 240,000m² consisting of:

- Class A1/A2 (Retail) up to 3,000 m²
- Class A3/A4 (Cafes/Restaurants and Drinking Establishments) up to 3,000 m²
- Class A5 (Hot Food Takeaways) up to 300 m²
- Class B1 (Business) between 10,000 m²15,000 m²
- Class C1 (Hotels) up to 10,000 m²
- Class C3 (Residential) between 150,000 ~~sq~~ m² and 200,000 m² (up to 2,400 homes of different sizes and types); 2,394 in line with recent pre-app discussions
- Class D1 (Community) between 400 m² and 10,000 m²
- Class D2 (Leisure and Entertainment) between 4,120 m² and 15,800 m²
- Ground persons store up to 140 m²
- Demolition of all existing buildings with the exception of Millwall DC Stadium, Guild House and Rollins House
- Alterations to Surrey Canal Road and realignment of Bolina Road, new streets and pedestrian/cycle paths
- Hard and soft landscaping and publically accessible open space
- District heating centre and ENVAC waste handling system.

~~**DC/13/85143:** minor material amendment.~~

DC/20/119706 A hybrid application for outline for phases 2 – 5 and detailed design for Phase 1 was granted a resolution to approve in January 2022 for 3,518 residential floorspace and a variety of floorspace.

Site allocation

Comprehensive mixed-use redevelopment with compatible residential, commercial, community and main town centre uses, along with the retention, ~~or re-provision~~ enhancement and expansion of the football stadium~~.~~. New and improved transport infrastructure, including a new rail station serving the East London line (London Overground). Reconfiguration of buildings and spaces to facilitate new and improved routes, both into and through the site, along with public realm and environmental enhancements, including new public open space.

Opportunities

Surrey Canal Triangle is a large brownfield site covering an area of more than 10 hectares. Part of the site is owned by Renewal and part is owned by the Council. ~~–~~ The site is bounded by railway lines and bisected by Surrey Canal Road, with the Millwall Football Club stadium occupying a prominent position within it. There are 26 existing residential units located on the site. Comprehensive redevelopment of the site is integral to supporting regeneration in the area, with the creation of a new high quality mixed-use quarter and leisure destination that will help to secure a viable future for Millwall FC ~~within the Borough~~on this site. There is scope for transformational public realm and environmental enhancements to address existing issues of severance, and which are necessary to re-connect and better integrate the site with its surrounding neighbourhoods and communities, as well as the area's wider network of open spaces.

Development requirements

Commented [SA287]: Factual update – to reflect planning consent granted for the site.

Commented [SA288]: Factual update – to reflect planning consent granted for the site.

Commented [SA289]: Respond to consultation – to refer specifically to retention, enhancement and expansion

Commented [SA290]: Factual update – to reflect that the site is in multiple ownership

Commented [SA291]: Factual update – to reflect existing uses on the site.

Commented [SA292]: Respond to consultation – request to reference the future location of the club specifically on this site

1. Landowners must work in partnership and ~~D~~development must ~~be delivered through a site-wide masterplan, in accordance~~ have regard to the overarching vision and development principles set out in~~with~~ the Surrey Canal Triangle SPD and the permitted development scheme already consented on Renewal's land. The masterplan must consider co-location, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development).

2. Development of the Council owned land must capitalise on the opportunities presented by Millwall FC Stadium, including options for its re-provision and expansion, helping to secure the long term future of the football club ~~in the Borough~~ on this site.

3. Development proposals must seek to enhance the existing sports facilities, and make these accessible to the public and allow for the long term future of the Millwall Community Scheme.

~~3.~~4. Development proposals must demonstrate a comprehensive and coordinated approach to supporting healthy communities by integrating new and enhanced publicly accessible sports, leisure and recreation opportunities, including open spaces and community facilities, in line with Policy CI-1 (Safeguarding and securing community infrastructure).

~~4.~~5. Provision of commercial floorspace in line with Policy ~~EC 6~~EC7 (Mixed-use Employment Locations).

~~5.~~6. The site must be fully re-integrated with the surrounding street network to improve access and permeability in the local area, with enhanced walking and cycle connections between public spaces and the site's surrounding neighbourhoods. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors. The site must also facilitate the delivery of Cycleway 10.

~~6.~~7. Delivery of new and improved public realm and open space in accordance with a site-wide public realm strategy, including:

   a. A linked network of new high quality public open and green spaces as a central design feature

   b. Enhancements to Bridgehouse Meadows and Bolina Gardens, including access improvements, in partnership with infrastructure providers.

   c. High quality approaches to the existing South Bermondsey station and the future Overground station.

~~7.~~8. Provision for the new transport infrastructure within the site, including a new Overground station at Surrey Canal Road and an accompanying walking and cycle bridge, in partnership with TFL and infrastructure providers.

~~8.~~9. Positive frontages along key routes, with active ground floor frontages where possible.

~~9.~~10. Development proposals must protect and seek to enhance green infrastructure, including the SINC.

Development guidelines

1. Development should support the creation of a new high quality, mixed-use neighbourhood and visitor destination that is well integrated with its surrounding neighbourhoods and communities. Main town centre uses should be complementary in nature and scale and focussed on serving the development, whilst ensuring no adverse impact on existing town centres.

Commented [SA293]: Respond to consultation – request to have regard to the SPD instead of being in accordance with it.

Commented [SA294]: Factual update – to reflect planning consent granted for the site

Commented [SA295]: Amended for clarity and to aid policy implementation

Commented [SA296]: Amended to clarify, as Renewal's land already has planning consent

Commented [SA297]: Amended to clarify, in terms of the future location of the club

Commented [SA298]: Respond to consultation – request to specifically mention the long term future of the Millwall Community Scheme

Commented [SA299]: Factual update – to reflect new policy numbers in Regulation 19 Plan

Commented [SA300]: Respond to consultation – request to refer to a specific cycle route.

Commented [SA301]: Respond to consultation – landowner request that accessibility improvements beyond the site are not the sole responsibility of the developers.

Commented [SA302]: Respond to consultation – request to clarify the transport infrastructure required on-site and that this is subject to partnership working with other providers.

2. A new east-west route linking Folkestone Gardens / Deptford Park and Old Kent Road should form a central design feature, along with a clear north-south route linking South Bermondsey station to Bridgehouse Meadows and the new Overground station.

3. Quietway 1 runs along the eastern edge of the site, and should form a key focus for enhancements to the cycle network.

4. The layout of the site should ensure that Millwall FC Stadium can continue to function as a large spectator destination on a long term basis and must ensure it does not prejudice the ability of the stadium to expand. This includes appropriate arrangements for ongoing operation of the stadium, access, servicing and evacuation, without the need for relocation during construction of the Council owned land.

~~4.~~5. The design of development (including bulk, scale, massing and height of the buildings) should respond positively to its surrounding context and skyline including the heights of the railway viaducts, the SELCHP to the east of the site as well as Millwall FC Stadium located within the site. The site is a suitable location for tall buildings and t~~T~~he potential for tall buildings should be explored through the design-led process, taking into account protected views and vistas, including the panorama of the Bridge over the Serpentine~~.~~.

~~5.~~6. New routes, public realm and open spaces should be designed to address severance within and outside of the site caused by railways, embankments, roads and SELCHP. Public realm and access enhancements should include :

a. Walking and cycle routes along Bolina Road, and improved connectivity to Cycleway 10,
b. Walking and cycle routes to Surrey Quays north alongside the Overground,
c. Walking and cycle routes and access to the new railway station at Surrey Canal Road and South Bermondsey station
d. Improved links to Bridgehouse Meadows including upgrades to the Connect 2 path running between Bridgehouse Meadows and Oldfield Grove
e. Improvements to enable bus services ~~-~~within the site.

~~6.~~7. The design of development should respond positively to the historical and industrial character of the area, including the unlisted historic buildings at Ilderton Road~~.~~. Connectivity with the old gas holders on Old Kent Road in the borough of Southwark should also be considered.

~~7.~~8. Proposals should maximise opportunities to for decentralised energy network development associated with South East London Combined Heat and Power Station (SELCHP).

9. Transport for London and Network Rail should be consulted on development and design options.

10. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

~~8.~~11. Applicants should work in partnership with Thames Water to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied. New connections into the Ilderton Road trunk sewer will not be allowed. As Bolina Road does not have capacity for the whole of the site, development should utilise the capacity at the south end of the site.

Commented [SA303]: Respond to consultation – request to protect the ongoing operation of the stadium during construction of the surrounding land and not to prejudice the future development of the stadium

Commented [SA304]: Respond to consultation – request to specifically mention that tall buildings are suitable on the site.

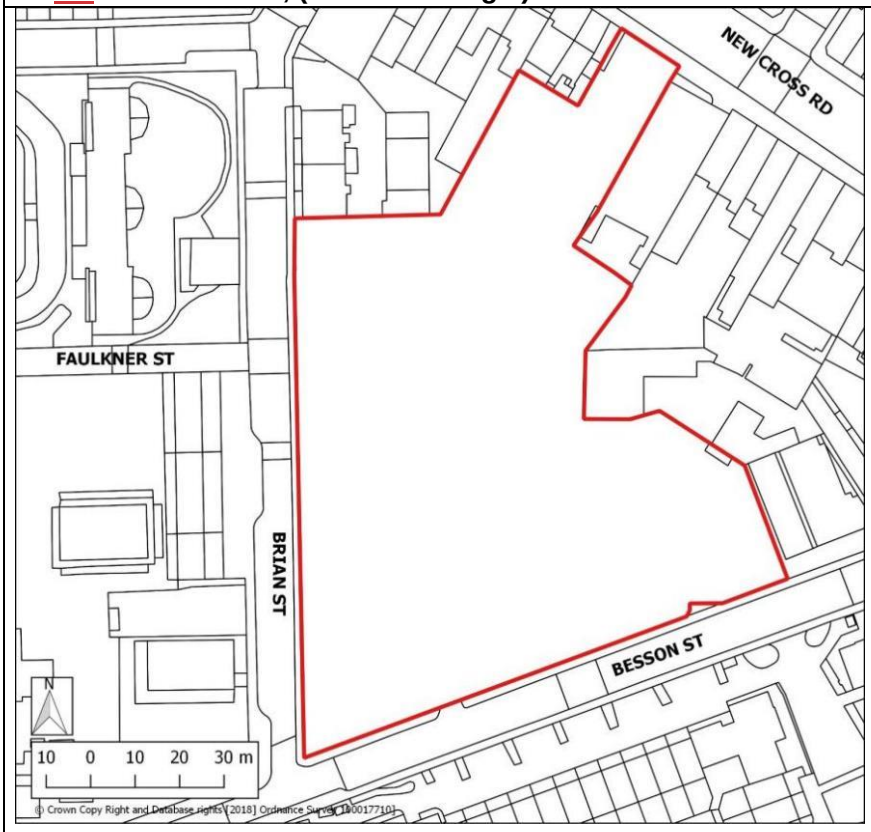
Commented [SA305]: Respond to consultation – request to refer to specific cycle routes.

Commented [SA306]: Respond to consultation – request to refer to specific cycle routes

Commented [SA307]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA308]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~17~~ 10 Besson Street, (Kender Triangle)



Site address:	Land on the rear of Besson Street, London, SE14 5AE			
Site details:	Site size (ha): 1.01, Setting: Urban, PTAL: In 2015: 6a, In 2021: 6a, In 2031: 6a, Ownership: Public, Current use: Vacant land			
How site was identified:	Site Allocation Local Plan (2013) and London SHLAA (2017)			
Planning designations and site considerations:	Opportunity Area, Growth Corridor, Appropriate Location for Tall Buildings, Local Centre Conservation Area, Archaeological Priority Area, Air Quality Management Area, Air Quality Focus Area, Creative Enterprise Zone, adjacent to Local Centre, adjacent to Night-time Economy Hub, Flood Zone ~~3a~~1, 2, 3			
Planning Status:	~~None, consent lapsed~~Full application DC/19/114805 was granted consent in January 2022.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: 324		Gross non-residential floorspace: Employment 0 Main town centre ~~907~~1,064	

Commented [SA309]: Factual update on designations

Commented [SA310]: Factual update – providing additional details on flood risk

Commented [SA311]: Factual update – on the progress made in redeveloping the site

Commented [SA312]: Capacities amended to reflect the planning consent granted for the site

Previous planning consent

DC/08/068448 was approved in 2009 but has since lapsed for 173 residential units, 2,020m^2 of D1 (including library, doctor's surgery, community uses), 815m^2 of D2 gym, 361m^2 of retail A1, A2, A3, A4 and 193m^2 A3 and a public square.

Existing planning consent

DC/19/114805 – Full application for the comprehensive redevelopment of land at corner of Briant and Besson Street comprising 324 residential units, flexible commercial floorspace (A1/A3/B1), a pharmacy (A1), GP surgery (D1) and community space (D2)

Commented [SA313]: Factual update - to reflect the planning consent granted for the site

Site allocation

Comprehensive mixed use development comprising compatible residential, main town centre and community uses.

Opportunities

This vacant site is located in Kender Triangle, and is bounded mainly by Briant Street and Besson Street, with a small frontage onto New Cross Road to the north east. It is situated in proximity to New Cross Road local centre and New Cross Gate station. . Site redevelopment will bring a vacant site back into active use and provide a more optimal use of land, with the introduction of a complementary range of uses, including new housing and community facilities. Redevelopment will also enable townscape improvements and public realm enhancements, including new public amenity space to act as a focal point for the neighbourhood

Development requirements

1. Well integrated community facilities that create a new focal point for the neighbourhood.
2. The site must be fully re-integrated with the surrounding street network to improve access and permeability, with enhanced walking and cycle connections to residential areas and public spaces. This will require a hierarchy of routes with clearly articulated corridors between Briant Street, Besson Street and New Cross Road.
3. Positive frontages along Briant Street, Besson Street and New Cross Road, with active ground floor frontages.
4. Delivery of new and improved public realm and open space in accordance with a site-wide public realm strategy, including a new public square as a central design feature.
5. Development must be designed to ensure the protection of amenity of the Music Room, having regard to the Agent of Change principle.

Development guidelines

1. Development should create positive frontages onto Besson Street and Briant Street to create a more coherent and unified street edge. A taller building on this junction may be appropriate to assist with wayfinding.
2. The design of development should respond positively to the surrounding area, in particular:
    a. Hatcham Conservation Area and Telegraph Hill Conservation Area.
    b. The Locally Listed Music Room, All Saints Church and the low rise villas on New Cross Road, at 116-118 New Cross Road.

c. The small scale backland buildings visible at the end of Fisher's Court.

3. Taller buildings will be most appropriately sited along Briant Street.

4. A unique but sensitive frontage on New Cross Road should respond to its position without creating an overly dominant façade.

5. Buildings should be focussed on the perimeter of the site to avoid overshadowing and wind tunnel effect.

6. There should be multiple active entrances and clear sight lines across the new public square, along with architectural differentiation of community facilities and private residential uses.

7. The layout of the site should create attractive and legible connections throughout the site, (including north-south from New Cross Road to Besson Street) enhancing links with neighbourhoods north and south of the site, and to Besson Street Gardens open space to the south west.

8. Applicants should work in partnership with Thames Water to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied. New connections into the New Cross Road trunk sewer will not be allowed.

Commented [SA314]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~9~~ 11 Former Hatcham Works, New Cross Road

Site address:	New Cross Gate Retail/Sainsbury's Site, New Cross Road, London, SE14 5UQ
Site details:	Site size (ha): 3.67, Setting: Urban, PTAL: In 2015: 5-6b, In 2021: 5-6b, In 2031: 5-6b, Ownership: Private, Current use: Retail, Car services, Car park
How site was identified:	Site Allocations Local Plan (2013), London SHLAA (2017), Lewisham Call for Sites (2018) and New Cross Area Framework (2019)
Planning designations and site considerations:	Opportunity Area, Growth Corridor, Appropriate Location for Tall Buildings, Conservation Area, Archaeological Priority Area, adjacent to Site of Importance for Nature Conservation, Adjacent to Strategic Open Space, Bakerloo Line Safeguarding Direction, Air Quality Management Area, Air Quality Focus Area, Creative Enterprise Zone, District Centre, Primary Shopping Area, Night-time Economy Hub, Flood Zone 1, within 30m buffer of electricity cable
Planning Status:	None (Application withdrawn)

Timeframe for delivery:	Years 1-5	Years 6-10 Yes	Years 11-15 Yes	Beyond 15 years ~~Yes~~
Indicative development capacity:	Net residential units: ~~912~~ 800		Gross non-residential floorspace: Employment ~~4,560~~ 7,550 Main town centre ~~18,240~~ 10,000	

Commented [SA315]: Factual update on designations

Commented [SA316]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Site allocation

New and improved transport infrastructure, including land and facilities required to accommodate the Bakerloo line extension. Comprehensive mixed-use redevelopment with compatible main town centre and residential uses.

Opportunities

The former site of the Hatcham Works is currently occupied by ~~-~~a retail park, including a Sainsbury's supermarket.~~-~~ The site is strategically located within the New Cross Gate District Centre, immediately to the west of New Cross Gate station and fronting New Cross Road.~~-~~ In March 2021 the Secretary of State issued a Safeguarding Direction for the BLE and this site has been identified as a temporary works site during the construction phase of the BLE. Redevelopment will enable the delivery of new and improved transport infrastructure, including a new station to accommodate the Bakerloo line extension. Development can make a more optimal use of land, with site intensification and the introduction of a wider range of uses to support the vitality and viability of the District Centre.

Commented [SA317]: Factual update – to reflect the safeguarding direction for the BLE

Development requirements

1. Development must be delivered in accordance with a masterplan that addresses the site's relationship with New Cross Gate station and the Goodwood Road / New Cross Road site~~,~~ and any requirements associated with the transport network, taking into account the New Cross Area Framework SPD. The masterplan should consider co-location, phasing and balance of uses across the site, in line with Policy DM3 (Masterplan and comprehensive development)

Commented [SA318]: Amended for clarity and to aid policy implementation

2. The site is safeguarded for the delivery of the BLE and as a temporary works site~~Safeguard land to support delivery of transport infrastructure, including where required for the Bakerloo Line extension~~. This includes creation of a new Bakerloo Line station which should integrate with the existing station, in consultation with Transport for London and Network Rail. No prejudicial development should occur before the BLE is delivered.

Commented [SA319]: Respond to consultation – TFL request reference to the safeguarding direction and that no prejudicial development occurs

3. The site must be fully re-integrated with the surrounding street network to improve access and permeability in the local area, with enhanced walking and cycle connections between public spaces and the site's surrounding neighbourhoods. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors. The site must also facilitate the delivery of Cycleway 11 along New C~~r~~oss Road.

Commented [SA320]: Respond to consultation – request to refer to a specific route

4. Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including:

    a. New walking and cycle access through the site from Hatcham Park Road / Hart's Lane. This must include a clearly articulated east-west route within the site, also enabling a link from Hatcham Park Road to Batavia Road via a bridge over the railway.

    b. Public realm improvements to enhance the station approach and improve the ~~pedestrian experience~~walking environment, including along New Cross Road and Hearts Lane, with a well-integrated station square.

    ~~b.~~c. Cycle parking infrastructure including a cycle hub.

Commented [PP1321]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

5. Positive frontages along New Cross Road, Harts Lane and other key routes, with active ground floor frontages.

Development guidelines

1. The design of development (including bulk, scale, massing and height of buildings) must respond positively to local character and should seek to enhance the setting of the heritage assets in the area including within the adjoining Hatcham Conservation Area, adjoining Telegraph Hill Conservation Area and nearby Deptford Town Conservation Area. In particular:

   ~~There should be no tall buildings close to New Cross Road, to protect and maintain the character of the street.~~

   a. Tall buildings, as defined within the context of New Cross Gate, should be set back from New Cross Road and should be located more centrally in the site to minimise ~~views of taller development that will be visible above the existing roofscapes~~ visual conflict with the heritage designed street frontages to the south and south east, and with the modestly scaled residential character of the areas to the east and west. In particular, there should be no tall buildings visible over the roofscape of New Cross Road as viewed from the junction with Lewisham Way. There should be no tall buildings close to New Cross Road so as to allow a contextual re-creation of the street frontage that protects and maintain the character of the street. 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.

   b. There should be a positive relationship with the site's western edge~~, including~~ that enhances the junction of Hatcham Park Road and access to the site, activates the east side of ~~,~~ Harts Lane and ~~access into the site~~ preserves the character of Brighton Grove.

   c. Given the low rise nature of the surroundings and the presence of designated conservation areas to the west, south and south east, proposals ~~prevailing, historic context any as defined within the context of New Cross Fate~~ must be rigorously tested ~~against their conservation area context~~ to demonstrate the impacts on the heritage assets in the vicinity, their setting and the neighbouring non-heritage designated townscape.

2. The layout of the site should incorporate sufficient space to accommodate interchange between bus, tube, rail, cycling and walking.

3. Development should provide for a range of unit sizes to accommodate a rich mix of main town centre uses, with flexibly specified units that can be adapted for a variety of end users.

4. Transport for London and Network Rail should be consulted on development and design options. Development proposals should maximise opportunities to enhance biodiversity within the green corridor that stretches along the railway line to the east of the site.

5. Applicants should work in partnership with Thames Water and engage with them early to manage surface water, divert existing sewers where applicable, allow access for maintenance and repair of sewers and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. New connections

Commented [PP1322]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

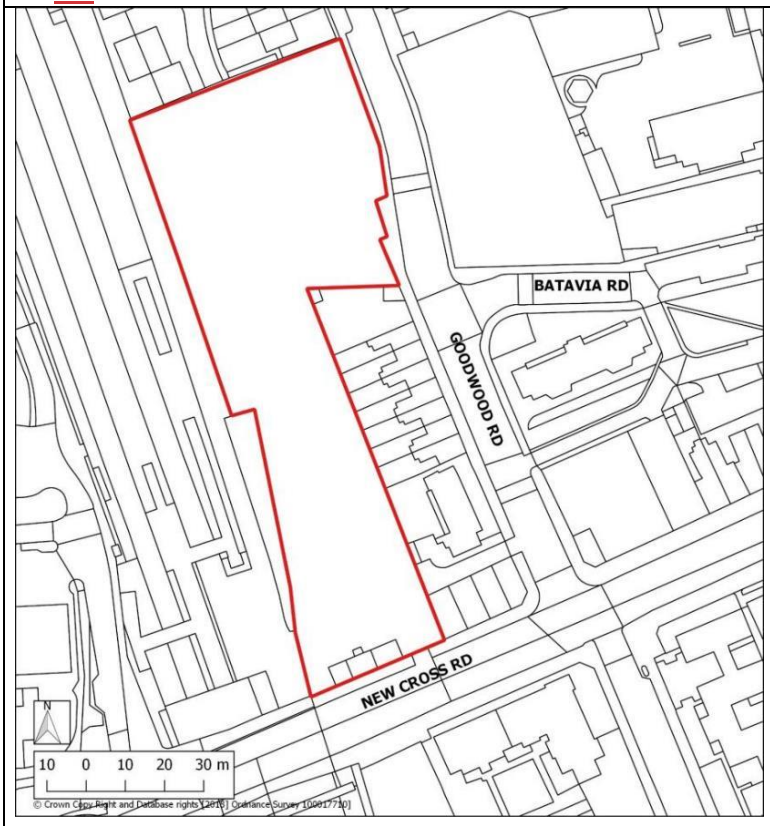
Commented [PP1323]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Commented [PP1324]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

into either of the trunk sewers crossing the site will not be allowed. The existing connection at the north end of the site is the most likely connection point.

Commented [SA325]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~10~~ 12 Goodwood Road and New Cross Road



Site address:	Former Goods Yard at 29 and 23-27 New Cross Road, London, SE14 6BL			
Site details:	Site size (ha): 0.62, Setting: Urban, PTAL: In 2015: 6b, In 2021: 6b, In 2031: 6b, Ownership: Private, Current use: Retail, Industrial, Vacant land			
How site was identified:	Site Allocations Local Plan (2013), London SHLAA (2017), Lewisham Call for Sites (2018) and New Cross Area Framework (2019)			
Planning designations and site considerations:	Opportunity Area, Appropriate Location For Tall Buildings, Conservation Area, Archaeological Priority Area, Air Quality Management Area, Air Quality Focus Area, Creative Enterprise Zone, District Centre, Primary Shopping Area, Night-time Economy Hub, Flood Zone 1, Groundwater Source Protection Zone 3, within 30m buffer of electricity cable, adjacent to Strategic Open Space			
Planning Status:	~~Pre-application~~None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 Yes	Beyond 15 years
Indicative development capacity:	Net residential units: ~~121~~ 167		Gross non-residential floorspace: Employment ~~564~~ 3,550 Main town centre ~~2,257~~ 1,050	

Commented [SA326]: Factual update – providing additional details on flood risk

Commented [SA327]: Factual update on designations

Commented [SA328]: Factual update – on the progress made in redeveloping the site

Commented [SA329]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Existing planning consent

DC/11/77418 and 19 was approved in 2012, has been implemented, but has not yet been built for a mixed use redevelopment three blocks of 3 – 8 storeys comprising 148 residential units and 200m^2 of retail floorspace (A1-A5) together with car and bicycle parking, public and private amenity space, public realm and new pedestrian and servicing access onto Auburn Close and Goodwood Road.

Site allocation

Comprehensive mixed-use redevelopment comprising compatible residential and main town centre uses. Public realm enhancements, including new and improved walking and cycle routes.

Opportunities

This site is strategically located within New Cross Gate District Centre, to the immediate east of New Cross Gate station and fronting New Cross Road. ~~.~~ Redevelopment can optimise the use of land by bringing the largely vacant site back into active use, and helping to support the vitality and viability of the District Centre. Development will also enable public realm and access improvements, with key opportunities to enhance the station approach as well as walking and cycle routes along and around New Cross Road.

Development requirements

1. Landowners must work in partnership. Development must be delivered in accordance with a masterplan that addresses the site's relationship with New Cross Gate station and the former Hatcham Works site~~,~~ and any requirements associated with the transport network. The masterplan must consider ~~,~~the co-location, phasing and balance of uses across the site, taking into account the New Cross Area Framework SPD and be in line with Polcy DM3 (Masterplans and comprehensive development).

2. Safeguard land to support delivery of transport infrastructure, including where required for the Bakerloo Line extension.

3. The site must be fully re-integrated with the surrounding street network to improve access and permeability in the local area, with enhanced walking and cycle connections. The site must also facilitate the delivery of Cycleway 11 along New Cross Road.

~~2.~~4. Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including:

   a. New walking and cycle access through the site from Goodwood Road. This must include a clearly articulated east-west route within the site, also enabling a link from Hatcham Park Road to Batavia Road via a bridge over the railway.

   b. Public realm improvements to enhance the station approach, including along New Cross Road.

~~3.~~5. Positive frontages along New Cross Road and Goodwood Road, with active ground floor frontages along New Cross Road.

Development guidelines

1. The design of development (including bulk, scale, massing and height of buildings) must respond positively to local character, and should seek to enhance the setting of

Commented [SA330]: Amended for clarity and to aid policy implementation

Commented [SA331]: Respond to consultation – request to improve network and to refer to specific cycleway

the heritage assets in the area including within the adjoining Deptford Town Conservation Areas and nearby Hatcham Conservation Area. In particular:

~~a.~~ Tall buildings, as defined within the context of New Cross Gate, 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, and with the modestly scaled residential character of the areas to the east and west. In particular, there should be no tall buildings visible over the roofscape of New Cross Road as viewed from the junction with Lewisham Way. There should be no tall buildings close to New Cross Road so as to allow a contextual re-creation of the street frontage that protects and maintain the character of the street. ~~Tall buildings, as defined within the context of New Cross Gate, should not impact detrimentally on the views of the east end of the High Street, particularly the setting of the New Cross Inn (locally listed) and the Grade II listed Deptford Town Hall.~~

~~b. Tall buildings should be set back from New Cross Road and should be located more centrally in the site to minimise views of taller development that will be visible above the existing roofscapes.~~

~~c.~~a. Given the low rise nature of the prevailing, historic context any tall buildings as defined within the context of New Cross Gate must be rigorously tested against their conservation area context, views, adjacencies and impacts.

2. The layout of the site should incorporate sufficient space to accommodate interchange between bus, tube, rail, cycle, with generous space for movement by walking

3. Transport for London and Network Rail should be consulted on development and design options.

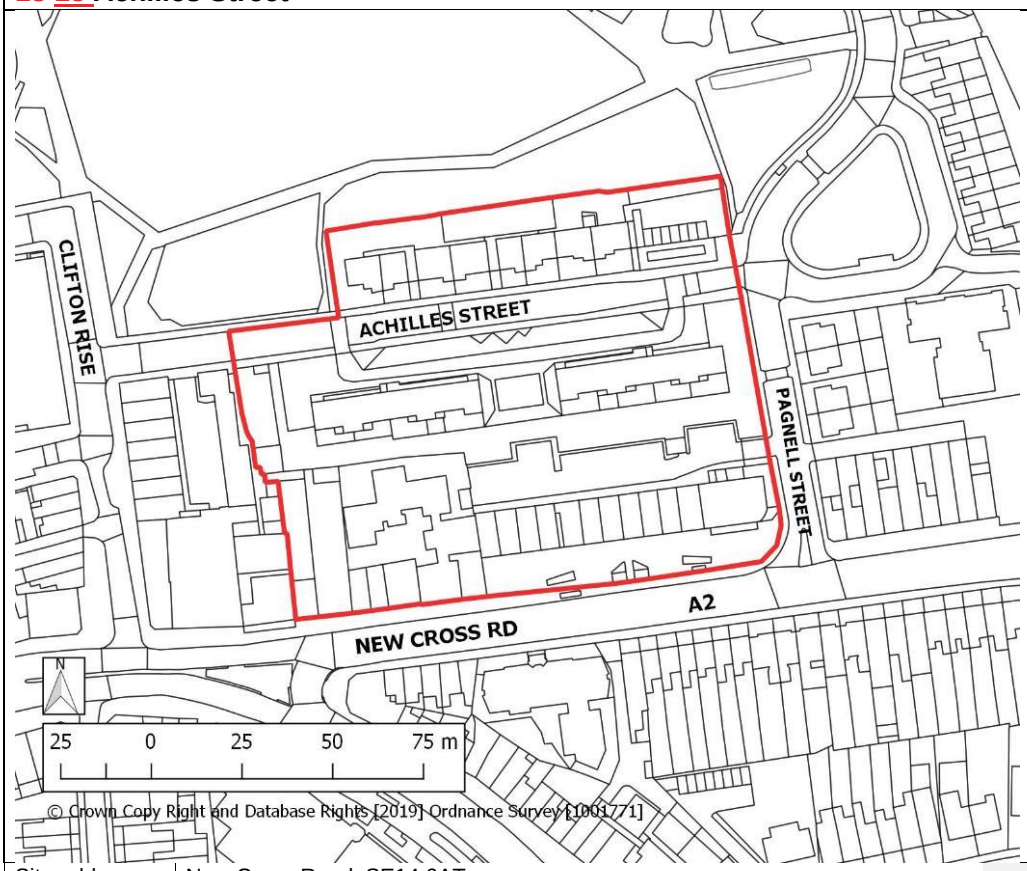
4. Development proposals should maximise opportunities to enhance biodiversity within the green corridor that stretches along the railway line to the west of the site.

5. Applicants should work in partnership with Thames Water and engage with them early to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. There is sufficient capacity in the sewers on Goodwood Road and New Cross Road.

Commented [SA332]: Amended for clarity and to protect the surrounding character and
Respond to consultation – request to minimise the impact of tall buildings on New Cross Road

Commented [SA333]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~18~~ 13 Achilles Street



Site address:	New Cross Road, SE14 6AT			
Site details:	Site size (ha): 1.40 Setting: Urban, PTAL: In 2015: 6a, In 2021: 6a, In 2031: 6a, Ownership: Public Current use: Residential, Main town centre uses			
How site was identified:	London SHLAA (2017)			
Planning designations and site considerations:	Opportunity A~~a~~rea, Appropriate Location for Tall Buildings, Archaeological Priority Area , adjacent to Conservation Area, adjacent to Listed Building, adjacent to ~~Public Open Space~~Strategic Open Space~~,~~, Air Quality Management Area , Air Quality Focus Area , Creative Enterprise Zone, District Centre, Primary Shopping Area, Night-time Economy Hub, Flood Zone~~**~~ 1 , Groundwater Source Protection Zone 2, Cultural Quarter			
Planning Status:	~~None~~Pre-application			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10 Yes	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~651~~ 363		Gross non-residential floorspace: Employment 0 Main town centre 2,716	

Commented [SA334]: Factual update on designations

Commented [SA335]: Factual update – providing additional details on flood risk

Commented [SA336]: Factual update - on the progress made in redeveloping the site

Commented [SA337]: Capacities amended to reflect ballot

Site allocation

Regeneration of existing housing estate. Comprehensive redevelopment with residential, community and main town centre uses. Public realm and environmental enhancements, including improved walking and cycle routes and new public open space.

Opportunities

The Achilles Street Estate is located to the north of New Cross Road and adjacent to Fordham Park and consists of 87 existing residential units. A residents' ballot was ~~recently~~ undertaken, which resulted in support for regeneration of the estate. Site redevelopment will provide a more optimal use of land, with the creation of 450 new high quality housing, including the re-provision of existing affordable housing ~~along with additional units.~~ Redevelopment will also enable the reconfiguration of buildings and spaces to improve the site's relationship with Fordham Park and maximise the amenity value provided by it.

Commented [SA338]: Factual update – to reflect existing use of the site

Commented [SA339]: Factual update – to acknowledge the gross residential capacity of the site

Commented [SA340]: Amended for clarity

Development requirements

1. No net loss of affordable housing, including appropriate re-provision of existing housing on the estate, in line with Policy HO4 (Housing estate maintenance, renewal and regeneration).
2. Estate regeneration, including the design of development proposals, must 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.
3. Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy, including north-south routes through the site connecting the High Street to the park.
4. Development design must respond positively to the character and enhance the amenity value of Fordham Park.
5. Main town centre uses along New Cross Road, with positive frontages the street including active ground floor frontages.
6. Positive frontages along Achilles Street and Fordham Park, with a high quality interface and improved connections to Fordham Park.

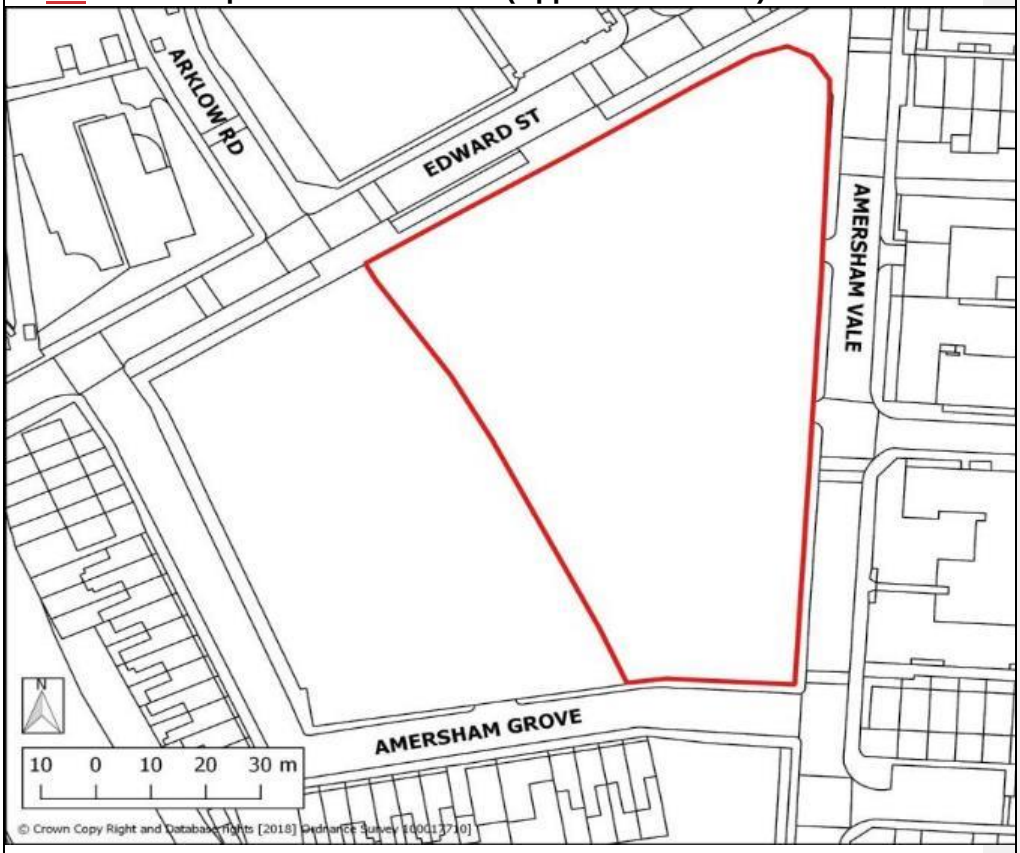
Development guidelines

1. Development should be designed to respect and respond positively to the scale and grain of the High Street.
2. Proposals should provide for an increase on the amount of town centre floorspace and existing number of shop units on the ground floor.
3. Spaces between buildings facing Fordham Park should be designed as public spaces
4. Development must be designed to protect the amenity of The Venue, having regard to the Agent of Change principle
5. Development should be designed to improve access and permeability within and through the site, with particular consideration to routes to Fordham Park, as well as Lewisham Route 1.
6. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers

where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. New connections into the New Cross Road trunk sewer will not be allowed.

Commented [SA341]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~11~~14 Former Deptford Green School (Upper School Site)



Site address:	Site of former Deptford Green School, Amersham Vale, London, SE14 6LQ			
Site details:	Site size (ha): 0.68, Setting: Urban, PTAL: In 2015: 5, In 2021: 5, In 2031: 5, Ownership: Public, Current use: Former school			
How site was identified:	Site Allocations Local Plan (2013), Lewisham Call for Sites (2015) and London SHLAA (2017)			
Planning designations and site considerations:	Opportunity Area, Regeneration Node, Archaeological Priority Area, Creative Enterprise Zone, Air Quality Management Area, Flood Zone 3~~a~~, Groundwater Source protection Zone 2, Adjacent to Strategic Open Space.			
Planning Status:	Full application DC/15/095027 granted in July 2018. ~~Started construction~~Now complete.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: 120		Gross non-residential floorspace: Employment 0 Main town centre 0	

Commented [SA342]: Factual update on designations

Commented [SA343]: Factual update – providing additional details on flood risk

Commented [SA344]: Factual update – on the progress made in redeveloping the site

Commented [SA345]: Capacities remain the same as Regulation 18 plan

Existing planning consent

DC/15/095027 ~~–~~ Full application for the c~~C~~onstruction of residential blocks ranging between 1 and 5 storeys in height comprising 120 residential flats, maisonettes and houses, together with the provision of refuse and cycle storage and associated landscaping at the land of the former Deptford Green School, Amersham Vale, SE14.

Site allocation

Redevelopment for residential uses.

Opportunities

This site comprises the former Deptford Green School, Upper School site, and associated grounds. It has been cleared and is now vacant following the ~~-~~relocation of the school. A new public park, Charlottenburg Park, has recently been created to the site's western boundary at the former Lower School site. The land will be brought back into active use through redevelopment, with new high quality housing that benefits from the amenity provided by the park.

Development requirements

1. Positive frontages along Amersham Grove, Edward Street and Amersham Vale.
2. New and improved public realm in accordance with a site-wide public realm strategy, including safe and legible walking and cycle routes through the site to Charlottenburg Park.
3. Protect and enhance the amenity value provided by Charlottenburg Park.

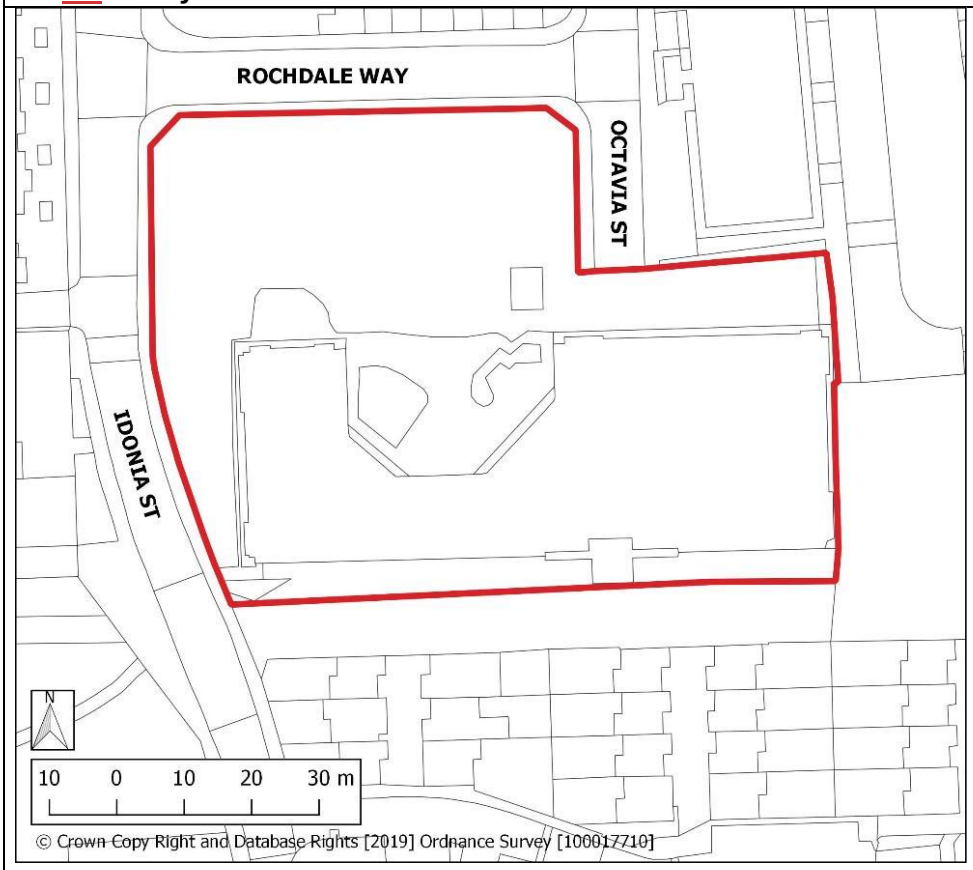
Development guidelines

1. The layout of the site should be designed to open up the site for walking and cycle routes that are well-integrated with the surrounding street network. This may include a central mews street that creates a route across the site.
2. Larger and taller building elements facing Charlottenburg Park may be appropriate in order to maximise the amenity value of the park, but careful consideration will be needed to ensure this is not compromised. A taller element at the northeast corner of the site, marking the corner of Amersham Vale and Edward Street, may also be acceptable.
3. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.
4. Applicants should work in partnership with Thames Water to manage surface water, divert existing sewers where applicable, allow access for maintenance and repair of sewers and ensure infrastructure upgrades are delivered ahead of the site being occupied. New connections into the trunk sewer at the south of the site will not be allowed.

Commented [SA346]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA347]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~12~~ 15 Albany Theatre



Site address:	Douglas Way, London, SE8 4AG			
Site details:	Site size (ha): 0.61, Setting: Central, PTAL: In 2015: 6a, In 2021: 6a, In 2031: 6a, Ownership: Private, Current use: Theatre			
How site was identified:	London SHLAA (2017) and Lewisham Call for Sites (2018)			
Planning designations and site considerations:	Opportunity Area, Regeneration Node, Conservation Area, Archaeological Priority Area, Air Quality Management Area, Air Quality Focus Area, District Centre, Creative Enterprise Zone, Flood Zone 1, Groundwater Source Protection Zone 2, Night-time Economy Hub, Cultural Quarter			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 Yes	Beyond 15 years
Indicative development capacity:	Net residential units: ~~102~~ 119		Gross non-residential floorspace: Employment ~~0~~ 758 Main town centre ~~5,002~~ 3,032	

Commented [SA348]: Factual update on designations

Commented [SA349]: Factual update – providing additional details on flood risk

Commented [SA350]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Site allocation

Comprehensive mixed-use redevelopment comprising compatible main town centre and residential uses, including retention and enhancement of the Albany Theatre. Public realm enhancements, including public open space.

Opportunities

The Albany Theatre is situated within Deptford District Centre. It is of local historical, social and cultural significance, and a key feature of the Deptford Creekside Cultural Quarter. Redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the vitality and viability of the town centre. Development will also enable enhancements to the theatre that will help to secure its long-term future at this prominent location.

Development requirements

1. Development must delivered in accordance with a site masterplan, to ensure coordination, phasing and balance of uses across the site, including the Albany Theatre, and the market at Douglas Way adjacent to it, in line with Policy DM3 (Masterplan and comprehensive development) .
2. Retention or appropriate re-provision of the Albany Theatre on the site, in line with Policy CI-1 (Safeguarding and securing community infrastructure).
3. Development must be designed to respond positively to the setting of the Conservation Area and the Grade II listed Deptford Ramp.
4. Delivery of new and improved public realm in accordance with a site-wide public realm strategy.
5. Positive frontages along Douglas Way and Idonia Street to protect and enhance the amenity of the market along Douglas Way.

Development guidelines

1. The bulk, scale, massing and height of buildings should ensure no unacceptable level of over shadowing of the existing open space in the northern part of the site, or any re-provided open space, and the residential properties to the north of the site. To avoid overshadowing taller elements should be concentrated to west of the site where the building would need to 'turn the corner' successfully.
2. Development should create positive frontages onto Idonia Street and Douglas Way, with active ground floor frontages incorporated into the development wherever possible, taking into account the operational requirements of the theatre and the need to protect the public realm, and the market at Douglas Way.
3. The Albany Theatre is a non-designated heritage asset of historical, social and cultural significance. Deptford Conservation Area lies immediately east of the site. To the east of the site lies the Grade II listed Deptford Ramp, the oldest surviving railway structure in London, and was restored as part of the Deptford Market Yard development. The site also lies within an Area of Archaeological Priority.
4. The community gardens are Neighbourhood Open Space and development proposals will be considered with reference to GR2 Open Space.
5. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site

Commented [SA351]: Amended for clarity and to aid policy implementation

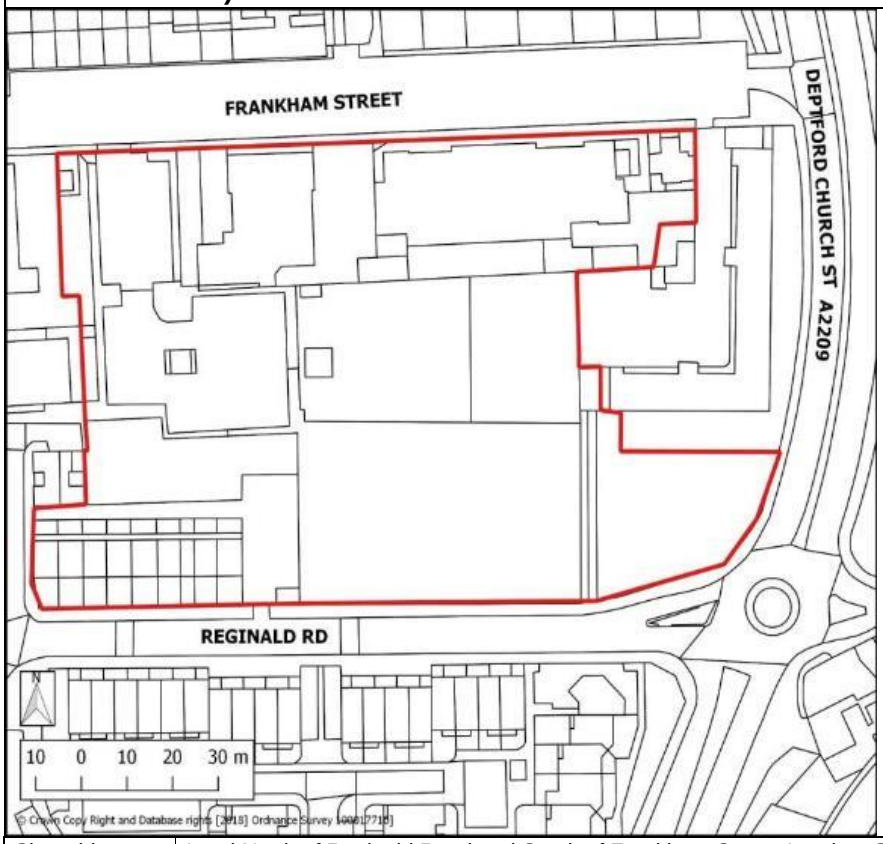
Commented [SA352]: Respond to consultation – request to refer to public realm and the Douglas Way market

Commented [SA353]: Amended for clarity and to aid policy implementation

being occupied through a housing phasing plan. New connections into the Douglas Way trunk sewer will not be allowed.

Commented [SA354]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~13~~ 16 Land north of Reginald Road and south of Frankham Street (former Tidemill School)



Site address:	Land North of Reginald Road and South of Frankham Street, London, SE8 4RL			
Site details:	Site size (ha): 1.26, Setting: Urban, PTAL: In 2015: 5, In 2021: 6a, In 2031: 6a, Ownership: Public, Current use: Former school, Caretakers house			
How site was identified:	Site Allocations Local Plan (2013) and London SHLAA (2017)			
Planning designations and site considerations:	Opportunity Area, Regeneration Node, Conservation Area, Archaeological Priority Area, Air Quality Management Area, Air Quality Focus Area , Creative Enterprise Zone, District Centre, Night-time Economy Hub, Flood Zone 2, Groundwater Source Protection Zone 1			
Planning Status:	Full application DC/16/095039 granted in July 2018. ~~Under~~Started construction.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~209~~ ~~201~~193		Gross non-residential floorspace: Employment 0 Main town centre 0	

Commented [SA355]: Factual update on designations

Commented [SA356]: Factual update – providing additional details on flood risk

Commented [SA357]: Factual update – on the progress made in redeveloping the site

Commented [SA358]: Capacity amended to reflect the planning consent granted for the site

Existing planning consent

DC/16/095039 - Full application for the d~~D~~emolition of the former caretaker's house on Frankham Street and 2-30A Reginald Road, partial demolition, conversion and extension of the former Tidemill School buildings and the construction of three new buildings ranging from 2 to 6 storeys at Land North of Reginald Road & South of Frankham Street SE8, to provide 209 residential units (80 x one bedroom, 95 x two bedroom, 26 x three bedroom, 8 x four bedroom) together with amenity space, landscaping, car and cycle parking.

Site allocation

Comprehensive redevelopment for residential uses.

Opportunities

This site comprises the former Tidemill Primary School and associated grounds, the Old Tidemill Wildlife Gardens and 16 existing properties~~, and~~. It is located within Deptford District Centre. It is now vacant following the relocation of the school. The site immediately to the north comprises the Deptford Lounge library and community facility. The land will be brought back into active use through redevelopment, with new high quality housing. Development will also enable public realm enhancements to improve the site's relationship with the Deptford Lounge, and also support the vitality and viability of the town centre.~~.~~

Commented [SA359]: Factual update – to reflect existing use of the site

Development requirements

1. Retention of the former main school building and annexe, with conversions and roof extensions and the development of new additional buildings.
2. Positive frontages along Frankham Street and Reginald Road.
3. Delivery of new and improved public realm and public open space in accordance with a site-wide public realm strategy, including a new landscaped square, framed by new and converted buildings.
4. The site must be fully re-integrated with the surrounding street network to improve access and permeability into and through the town centre, with enhanced walking and cycle connections to the Deptford Lounge, Griffin Square, and the wider town centre area. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors. The site must also facilitate cycle lanes along Deptford Church Street.

Commented [PP1360]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Commented [SA361]: Respond to consultation – request to refer to a specific cycle route

Development guidelines

1. The design of development should respond positively to the surrounding building heights, particularly the retained school buildings, and take account of the proximity to the adjoining Deptford ~~Town~~ High Street and St Paul's Church Conservation Area and nearby Deptford Creek Conservation Area, including the ~~and~~ Crossfield estate, which ~~has~~ is of heritage significance. Development should not be visible from within Deptford High Street and should not detract from the setting, character and appearance of Griffin Square.
2. To create a distinctive identity, different designs and scales across the site should be used to reflect different site conditions, spatial character and distinctive features and buildings that already exist on-site.
3. A cohesive public realm should create strong relationships to public realm elsewhere in Deptford. New public realm should be able to accommodate a range of appropriate activities whilst retaining an overall tranquil environment. Destinations should be created through a series of courtyard spaces and landscaping should be used to soften spaces and create an interesting streetscape.

Commented [SA362]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

4. Consideration should be given to the retention of mature trees, especially those adjacent to the annexe and along the Frankham House boundary.

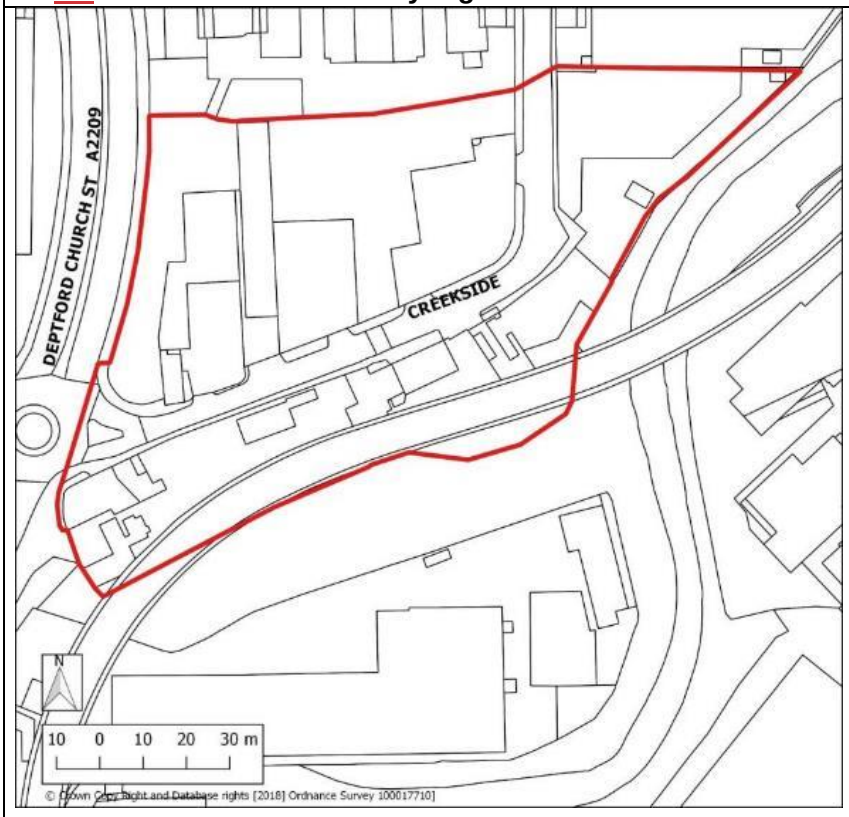
~~4.~~5. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

~~5.~~6. Applicants should work in partnership with Thames Water to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied. There is potential for discharge in Deptford Creek. New connections into the Deptford Church Street trunk sewer will not be allowed and impacts on the Deptford Storm Overflow should be avoided.

Commented [SA363]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA364]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~16~~ 17 Lower Creekside Locally Significant Industrial Site



Site address:	Creekside, London, SE8 4SA			
Site details:	Site size (ha): 1.10, Setting: Central, PTAL: In 2015: 0-6a, In 2021: 0-6a, In 2031: 0-6a, Ownership: Mixed, public and private, Current use: Industrial, Wharf			
How site was identified:	Site Allocations Local Plan (2013), London SHLAA (2017) and Lewisham Call for Sites (2018)			
Planning designations and site considerations:	Opportunity Area, Regeneration Node, Conservation Area, Locally Significant Industrial Site, Archaeological Priority Area , Waterlink Way, adjacent to Site of Importance for Nature Conservation, Air Quality Management Area, Air Quality Focus Area, Creative Enterprise Zone, Cultural Quarter, Flood Zone 3~~a~~, adjacent to River Ravensbourne, Tidal defences adjacent to site, Groundwater Source Protection Zone 1			
Planning Status:	~~Pre-application~~Full application DC/18/106708 was granted consent in May 2020. Started construction. Pre-applications for remainder of the site.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10 Yes	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~160~~ 162		Gross non-residential floorspace: Employment 8,201 Main town centre 0	

Commented [SA365]: Factual update on designations

Commented [SA366]: Factual update – providing additional details on flood risk

Commented [SA367]: Factual update – on the progress made in redeveloping the site

Commented [SA368]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Existing planning consent:

DC/18/106708 – Full application for part of the site, demolition of existing buildings at 1 Creekside and construction of 56 residential units and 1541m^2 commercial space (B1).

Site allocation

Comprehensive employment led redevelopment. Co-location of compatible commercial, residential and complementary uses. Public realm enhancements, including improved connections to Deptford Creek.

Opportunities

The site comprises a Locally Significant Industrial Site located within the Deptford Creekside Cultural Quarter, in proximity to the Faircharm estate and Trinity Laban Centre. It is located within the Deptford Creek/Greenwich Riverside Opportunity Area that seeks to deliver new jobs and homes. It is occupied by a range of commercial uses, including workshops and offices focussed around the creative industries and has 7 existing residential units. Creekside Road runs through the site. Redevelopment and site intensification, along with the co-location of commercial and other uses will provide a more optimal use of land and support local area regeneration and the Cultural Quarter. ~~.~~ Development will also enable public realm and environmental enhancements to improve the quality of the Creekside area

Development requirements

1. Landowner must work in partnership and ~~Phased d~~~~Development must be delivered~~ in accordance with a masterplan, to ensure the appropriate co-location, phasing and balance of employment and other uses across the site and the emerging character of consented development schemes, in line with Policy DM3 (Masterplans and comprehensive development)~~.~~
2. Development must not result in a net loss of industrial capacity, or compromise the function~~al integrity~~ of the employment location, in line with Policy ~~EC 5~~EC6 (Locally Significant Industrial Sites).
3. Positive frontages along Deptford Creek, Deptford Church Street and Creekside, with active ground floor frontages incorporated into the strong street edge provided by the historic boundary walls~~where possible~~.
4. Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy, including:
   a. Waterside access and amenity space, with provision of a new public path along Deptford Creek linking to Waterlink Way,
   b. widened pavements at pinch points in Creekside, and
   c. the creation of new yards behind the street frontage.
   ~~a.~~d. better inter-connectivity with Deptford High Street through a green corridor.
5. Development proposals must protect and seek to enhance green infrastructure, including the SINC, the intertidal terrace and the sand martin bank at Deptford Creek, taking into account the River Corridor Improvement Plan SPD.

~~5.~~6. Development proposals must protect and sustain the existing boat houses, Lewisham's boat dwelling community, as this distinctive ~~—~~riverside setting forms part of one of the important characteristics of the Creekside Conservation Area.

Commented [SA369]: Factual update – to reflect the planning consent granted for the site.

Commented [SA370]: Respond to consultation – request to refer to the Opportunity Area

Commented [SA371]: Factual update – to reflect the existing use of the site

Commented [SA372]: Respond to consultation – request to acknowledge that part of the site already has planning consent

Commented [SA373]: Amended for clarity and to aid policy implementation

Commented [SA374]: Factual update – to reflect new policy numbers in Regulation 19 plan

Commented [SA375]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Commented [SA376]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Commented [SA377]: Respond to consultation – request to reference public realm improvements and a specific route

Commented [SA378]: Amended for clarity and to aid policy implementation

Commented [SA379]: Respond to consultation – request to refer to boat dwelling community

Development guidelines

1. Non-employment uses, including residential uses, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses.

2. Development proposals should prioritise the integration of new workspace, artists' studio space and cultural facilities that contribute to the Deptford Creekside Cultural Quarter~~.~~ and other uses, including residential uses, must not adversely impact on the Cultural Quarter, in line with the Agent of Change principle.

3. The development should be designed having regard to the character ~~and amenity of the the Trinity Laban Centre, the Faircharm site, the buildings opposite the Creek in Greenwich, development at the former Tidemill School and elevated DLR~~ and appearance of the Conservation Area, the buildings within it that make a positive contribution, the green and open spaces that are integral to the character of the Crossfield's estate and provide amenity for residents and the Creek itself.

4. Building heights will need to ~~be designed~~ have~~ing~~ regard to impacts on the existing boundaries that make a positive contribution to the character and appearance of the Creekside Conservation Area, (including the historic Crossfield's Estate) and create a drop in scale from the heights on Deptford Church Street. They should also have regard to the setting of Grade I Listed St Paul's Church in Deptford, grade II listed Mumford's Mill (RBG), grade II listed Railway Viaduct and the setting ~~the heritage setting~~ of Deptford ~~Church~~ High Street and ~~St~~ St Paul's Church Conservation Area~~Creekside and on the historic Crossfield~~ Estate.

5. Development should be informed ~~through~~ by 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, including the green and open spaces that are integral to the character of the estate~~ and respond to this through improving access to the Creek, creating new views of it and of significant historic buildings on its banks, creating opportunities for river related occupations, and revealing its history and presence through art, design, materials, layout and uses.

6. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

7. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable, and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. There is potential for discharge into Deptford Creek.

Commented [SA380]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Commented [SA381]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

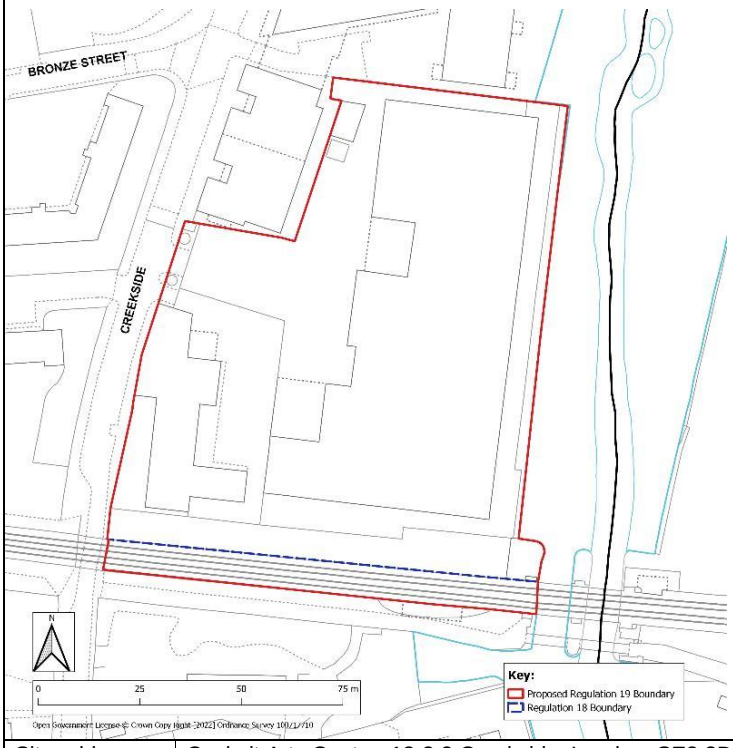
Commented [SA382]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Commented [SA383]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Commented [SA384]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA385]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~14~~ 18 Sun Wharf Mixed-Use Employment Location (including Network Rail Arches)



Site address:	Cockpit Arts Centre, 18-2 2 Creekside, London, SE8 3DZ			
Site details:	Site size (ha): 1.00, Setting: Urban, PTAL: In 2015: 0-3, In 2021: 0-3, In 2031: 0-3, Ownership: Private, Current use: Industrial, Wharf			
How site was identified:	Site Allocations Local Plan (2013) and London SHLAA (2017)			
Planning designations and site considerations:	Opportunity Area, Appropriate Location for Tall Buildings, Mixed-Use Employment Location, adjacent Conservation Area, Archaeological Priority Area, adjacent to Site of Importance for Nature Conservation, Waterlink Way, Air Quality Management Area, Creative Enterprise Zone, Cultural Quarter, Flood Zone 3~~a~~, adjacent to River Ravensbourne, Tidal defences adjacent to site, Groundwater Source Protection Zone 3			
Planning Status:	~~Application submitted.~~ Full application **DC/22/125674** for Cockpit Arts Centre was granted in May 2022. Full application **DC/20/118229** ~~has been submitted but has not yet been determined~~ was considered at Strategic Planning Committee on 1st September 2022~~.~~			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~235~~ 220		Gross non-residential floorspace: Employment ~~1,933~~1,443 Main town centre 0	

Commented [SA386]: Respond to consultation – landowner requested that the site name and map be changed to reflect that the railway arches are included within the site allocation.

Commented [SA387]: Factual update on designations

Commented [SA388]: Factual update – providing additional details on flood risk

Commented [SA389]: Factual update – on the progress made in redeveloping the site

Commented [SA390]: Capacities amended to reflect planning consent granted for the site and the submitted application

Existing planning consent

DC/22/125674 – Full application for the r~~R~~econfiguration of the main building at Cockpit Arts Centre, 18-22 Creekside to provide café, educational facility, foyer and visitor entrance.

Site allocation

Comprehensive mixed-use employment led redevelopment with compatible commercial, cultural, main town centre and residential uses. Public realm and environmental enhancements, including riverside improvements and new links to Ha'penny Bridge.

Opportunities

The site is a Mixed-Use Employment Location comprising a mix of storage sheds and warehouse buildings. Existing occupiers include the Cockpit Arts, a business incubator facility supporting the creative industries. The site is bounded by the Grade II listed railway viaduct to the south and Deptford Creek to the east. The Deptford Creekside Conservation Area boundaries lies to the south and west. The safeguarded Brewery Wharf, within the Royal Borough of Greenwich, is nearby. Redevelopment and site intensification, along with the integration of commercial, cultural and other uses, will provide a more optimal use of land to support the Deptford Creekside Cultural Quarter. Development will also enable public realm and environmental enhancements to improve the quality of the Creekside area, along with the ~~wider~~ immediate setting of the Deptford Creekside Conservation Area.

Development requirements

1. Landowners should work in partnership and ~~Phased d~~Development must be delivered ~~in accordance with a masterplan~~ to ensure coordination, phasing and balance of uses across the site including the Cockpit Arts Centre and Sun Wharf parcels of land, ~~ensuring initial phases are not prejudicial against latter phases~~, in line with Policy DM3 (Masterplans and comprehensive development).
2. Provision of commercial floorspace in line with Policy ~~EC 6~~EC7 (Mixed-use Employment Locations) including all types of studio space that meets the needs for space for creative industries~~.~~
3. Positive frontage along Deptford Creek ~~and~~, Creekside and to the southern site boundary, with active ground floor frontages where possible.
4. Development must provide physical and visual links to the roadway adjacent to the railway arches and optimise the ~~use of the railway arches~~ future potential for commercial, cultural and/or community activities.
5. ~~4.~~ The site must be fully re-integrated with the surrounding street network to improve access and permeability. The site must also facilitate the delivery of Cycleway 10 which runs over Ha'penny Bridge and Cycleway 35 running along Creeskide.
6. ~~5.~~ Delivery of new and improved public realm and open space in accordance with a site-wide public realm strategy, including:
    a. A new public square,;
    b. New and enhanced waterside access including provision of a new public path along Deptford Creek and potential for new public access to this path by the route to the north of the railway viaduct arches;
    c. ~~A~~ Potential for a new walking link through the viaduct arches to Ha'penny Bridge.

Commented [SA391]: Factual update – to reflect the planning consent granted for the site

Commented [SA392]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Commented [SA393]: Amended for clarity and to aid policy implementation

Commented [SA394]: Factual update – to reflect new policy numbers in Regulation 19 plan

Commented [SA395]: Respond to consultation – studio space should not be limited to artist studios

Commented [SA396]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Commented [SA397]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Commented [SA398]: Respond to consultation – request to refer to specific cycle routes

Commented [SA399]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Commented [SA400]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

~~6.~~7. Development must improve the ecological quality and amenity value of the riverside environment at Deptford Creek, taking into account the River Corridor Improvement Plan SPD.

8. Development proposals must protect and seek to enhance green infrastructure, ~~including the SINC,~~ the intertidal terrace, ~~and~~ the sand martin bank at Deptford Creek and the SINC at Creekside Discovery Centre, The Creek and at Sue Godfrey Park.

9. Development proposals must incorporate ways of revealing and conveying the history and heritage of the site and its surroundings, including riverine, railway, industrial and social history, as well as marking the entrance to Deptford and the borough by train.

~~7.~~10. Development should not impact on the World Heritage Site or other heritage assets within Royal Greenwich such as the Grade II Listed former Greenwich Town Hall and its' prominent tower.

Commented [SA401]: Amended for clarity and to aid policy implementation

Commented [SA402]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Commented [SA403]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Commented [SA404]: Respond to consultation – request to reference World Heritage site and designated heritage asset

Development guidelines

1. Development proposals should prioritise the integration of new workspace, artists' studio space and cultural facilities that contribute to the Deptford Creekside Cultural Quarter~~.~~. Other main town centre uses should be complementary in nature, ensuring no adverse impact on the vitality and viability of Deptford High Street.

2. The development should be designed so that the Cockpit Arts building retains a visual presence from Creekside, including where the building is to be re-provided.

3. The design of the development should enable the viaduct arches to be opened up and refurbished for commercial, cultural and/or community uses.

4. Artist studio space should be provided to complement creative uses that exist to the north and south of the site (Kent Wharf, Faircharm and Cockpit Arts), which together form an important cluster in the Cultural Quarter.

5. The potential for taller building elements to reflect the surroundings should be considered as part of a design led approach, ~~although this would need to~~and should ensure minimal impact on the Grade II listed railway viaduct and the Lifting Bridge Structure as well as the setting of the Grade I Listed St Paul's Church in Deptford and the LVMF panoramic view from Blackheath Point. Taller elements should be located in the south ~~western~~ eastern corner of the site, marking the junction of Creek~~side~~ and the railway viaduct.

6. The proposed residential development located in close proximity to the safeguarded Brewery Wharf should be designed to minimise the potential for conflicts of use and disturbance, including utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, in line with the Agent of Change principle.

Commented [SA405]: Respond to consultation – request to refer to a design led approach for tall buildings

Commented [SA406]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Commented [SA407]: Respond to consultation – request to refer to safeguarded wharf and the Agent of change principle

~~5.~~7. The design of the development should respond positively to the character and nature of Deptford Creek and the existing street pattern and ensure increased permeability through the site with public access to a route running along Deptford Creek that connects into the wider Waterlink Way. Development should not result in a reduction in existing footway or carriageway space.

~~6.~~8. Connections running south through the railway viaduct and east-west from Creekside along the northern edge of the viaduct should also be explored.

9. The design of the site should take account of views from within the Deptford Creekside Conservation Area, along Creekside, from the east bank of the Creek and from within

Commented [SA408]: Respond to consultation – to request no reduction in footway or carriageway

Commented [SA409]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Sue Godfrey Park Site of Importance for Nature Conservation. Development should ensure new buildings maximise the aspect over the waterway and ~~enabling~~ enable longer distance views beyond the waterway.

10. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

11. Applicants should work in partnership with Thames Water to manage surface water, divert existing sewers where applicable, allow access for maintenance and repair of sewers and ensure infrastructure upgrades are delivered ahead of the site being occupied. There is potential for discharge into Deptford Creek. New connections into the Creekside trunk sewer will not be allowed.

~~7.~~12. Network Rail should be consulted on development and design options including an east-west link along the northern side of the viaduct and access through the arch for a potential north-south link.

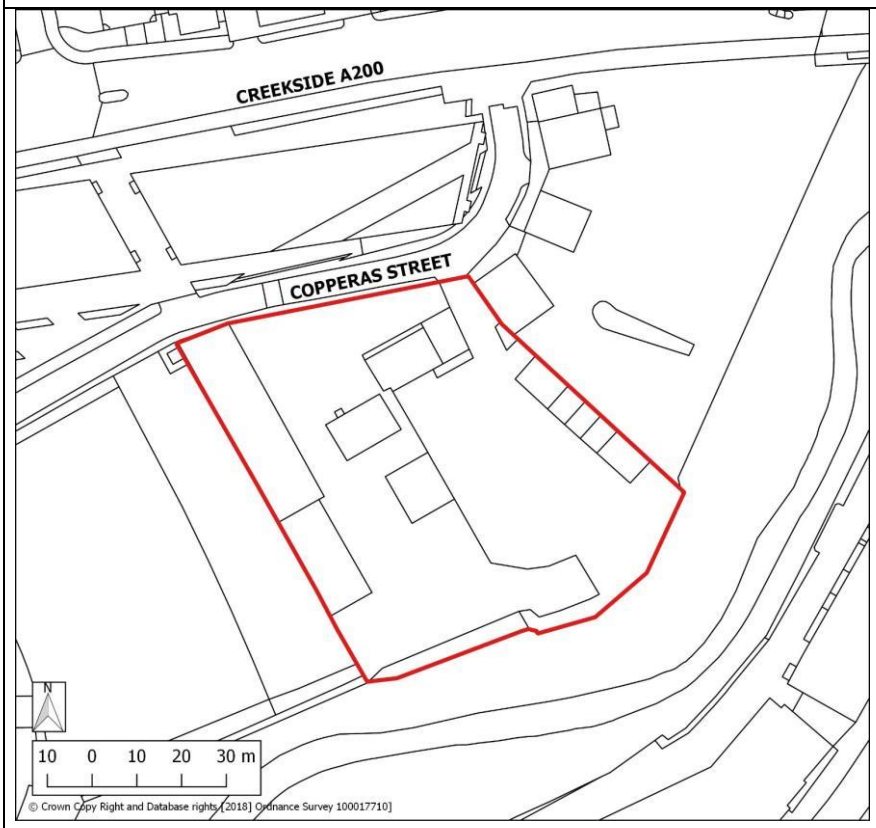
Commented [SA410]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Commented [SA411]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA412]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

Commented [SA413]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

~~15~~ 19 Creekside Village East, Thanet Wharf Mixed-Use Employment Location



Site address:	Copperas Street, Deptford, Copperas St, SE8 3DA, Deptford
Site details:	Site size (ha): 0.61, Setting: Urban, PTAL: In 2015: 0-2, In 2021: 0-2, In 2031: 0-2, Ownership: Mixed, public and private, Current use: Industrial, Wharf
How site was identified:	Site Allocations Local Plan (2013) and London SHLAA (2017)
Planning designations and site considerations:	Opportunity Area, Appropriate Location for Tall Buildings, Mixed-Use Employment Location, Archaeological Priority Area, adjacent to Site of Importance for Nature Conservation, Waterlink Way, Air Quality Management Area, Creative Enterprise Zone, Cultural Quarter, Flood Zone 3~~a~~, adjacent to River Ravensbourne, Tidal defences adjacent to site
Planning Status:	~~Pre-application~~Full application DC/18/108548 was granted a resolution to approve in November 2020

Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15	Beyond 15 years
	Yes			

Commented [SA414]: Factual update on designations

Commented [SA415]: Factual update – providing additional details on flood risk

Commented [SA416]: Factual update – on the progress made in redeveloping the site

Indicative development capacity:	Net residential units: ~~394~~ 393	Gross non-residential floorspace: Employment 114 Main town centre ~~757~~7,962

Existing planning consent

DC/18/108548 – Full application for the demolition of existing buildings and on land bound by Copperas Street and Deptford Creek comprising 393 residential units, 757m2 commercial floorspace and a cultural/performance venue, dance studios and education space for Trinity Laban.

Site allocation

Comprehensive mixed-use employment led redevelopment with compatible commercial, cultural, community, main town centre and residential uses. Public realm enhancements, including improved connections to Deptford Creek.

Opportunities

This site comprises a Mixed Use Employment Location which is currently vacant. The site occupies an important position within the Deptford Creekside Cultural Quarter, with the Trinity Laban Centre to the immediate west and Deptford Creek to the south. ~~-~~ The safeguarded Brewery Wharf, within the Royal Borough of Greenwich, is nearby. The land will be brought back into active use through redevelopment, with the integration of new commercial, cultural and other complementary uses that support the Deptford Creekside Cultural Quarter. Development will also enable public realm and environmental enhancements to improve the quality of the Creekside area, including access improvements via Waterlink Way.

Development requirements

1. Landowners must work in partnership and ~~Development must be delivered~~ in accordance with a masterplan, to ensure coordination, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development).
2. Provision of commercial floorspace in line with Policy ~~EC 6~~ EC7 (Mixed-use Employment Locations
3. Positive frontage along Copperas Street, Deptford Creek and at the western boundary of the site (facing Trinity Laban Centre), with active ground floor frontages where possible.
4. Delivery of new and improved public realm and open space in accordance with a site-wide public realm strategy, including:
   a. Waterside access and amenity space, with provision of a new public path along Deptford Creek linking to Waterlink Way; and
   b. Clearly articulated routes, and street level views, to Trinity Laban Centre and Deptford Creek.
5. Development proposals must protect and seek to enhance green infrastructure, including the SINC, the intertidal terrace and the sand martin bank at Deptford Creek, taking into account the River Corridor Improvement Plan SPD.

Development guidelines

1. Development proposals should prioritise the integration of new workspace, artists' studio space and cultural facilities that contribute to the Deptford Creekside Cultural

Commented [SA417]: Capacities amended to reflect the planning consent granted for the site

Commented [SA418]: Factual update – to reflect planning consent granted for the site

Commented [SA419]: Respond to consultation – request to refer to the safeguarded wharf

Commented [SA420]: Amended for clarity and to aid policy implementation

Commented [SA421]: Factual update – to reflect new policy numbers in Regulation 19 plan

Commented [SA422]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

Commented [SA423]: Amended for clarity and to aid policy implementation

Quarter. Other main town centre uses should be complementary in nature, ensuring no adverse impact on the vitality and viability of Deptford High Street. A new education / community facility will be supported in principle, particularly where this enhances existing provision associated with the Trinity Laban Centre.

2. The potential for tall buildings to reflect the surroundings, including the ~~emerging~~ cluster of tall buildings, should be considered through the design process, ~~although this would need to ensure minimal impact on the setting of Grade I Listed St Paul's Church in Deptford and the nearby Deptford Creek Conservation Area.~~ Potential impacts on the setting of the grade I listed St Paul's Church, Deptford and the nearby Deptford Creek Conservation Area, Deptford High Street and St Paul's Church Conservation Area, the Maritime Greenwich World Heritage Site and the Trinity Laban Centre must be assessed and harm avoided. ~~Tall buildings should be designed to act as a wayfinder for the Trinity Laban Centre.~~

3. The proposed residential development located in close proximity to the safeguarded Brewery Wharf should be designed to minimise the potential for conflicts of use and disturbance, including utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, in line with the Agent of Change principle.

4. Development should respond positively to Deptford Creek, which is a Site of Importance for Nature Conservation (Metropolitan importance) and forms part of the Waterlink Way. Protection should be given to the intertidal terrace and sand martin bank that have been previously enhanced, create ecological zones and a new tidal terrace, whilst retaining the right to navigate.

5. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

6. Applicants should work in partnership with Thames Water to manage surface water, divert existing sewers where applicable, and ensure infrastructure upgrades are delivered ahead of the site being occupied. There is potential for discharge into Deptford Creek.

7. Development should be designed to protect the biodiversity and amenity value of the nearby Sue Godfrey Park, which is partly a Site of Importance for Nature Conservation.

~~2.~~8. SUDS should be an integral part of the development, seeking to reduce rainwater runoff into Deptford Creek.

Commented [SA424]: Respond to consultation – to acknowledge impacts on heritage assets and in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

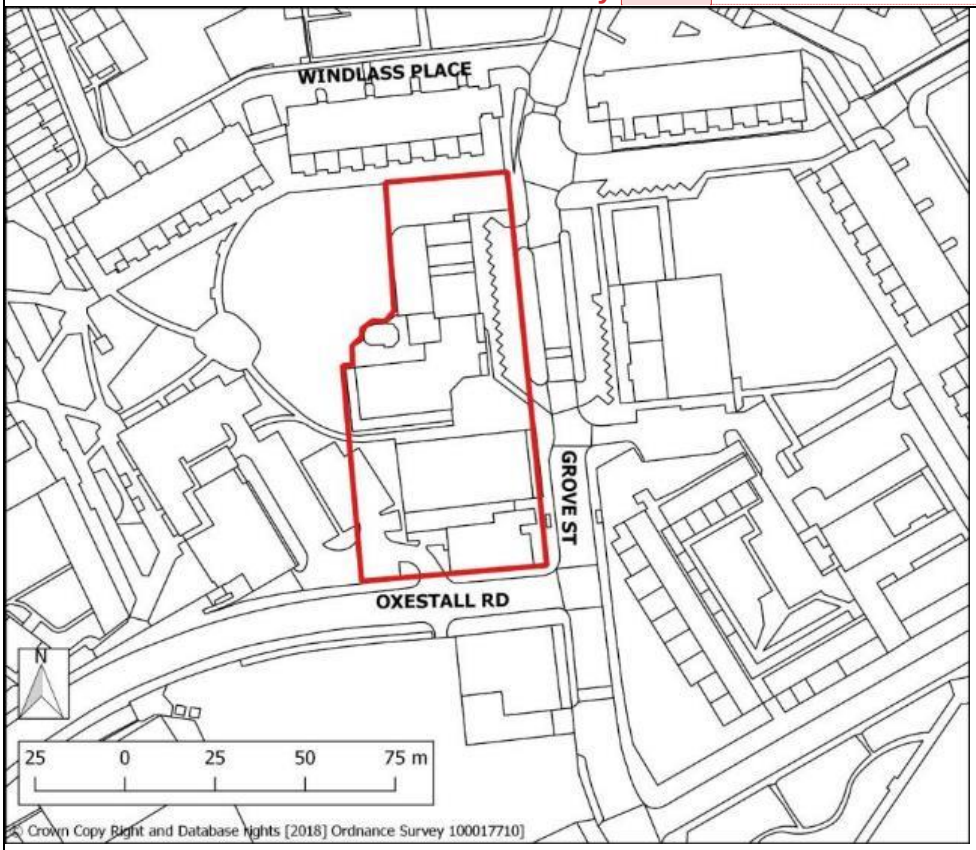
Commented [SA425]: Respond to consultation – request to reference the safeguarded wharf and Agent of Change principle

Commented [SA426]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA427]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

Commented [SA428]: Respond to consultation – in response to Historic England's request to revisit specific site allocations by analysing how they will affect the significance of heritage assets

3 Riverside Youth Club and 2000 Community Centre



Site address:	185 Grove St, London, SE8 3QQ			
Site details:	Site size (ha): 0.51, Setting: Urban, PTAL: In 2015: 2, In 2021: 2, In 2031: 2, Ownership: Private, Current use: Community Centre, Retail, Pharmacy			
How site was identified:	Lewisham Call for Stes (2018) and New Cross Area Framework (2019)			
Planning designations and site considerations:	Opportunity Area, Archaeological Priority Area, Thames Policy Area, Creative Enterprise Zone, Air Quality Management Area, Flood Zone 3a			
Planning Status:	None			
Timeframe for delivery:	2020/21 – 2024/25	2025/26 – 2029/30	2030/31 – 2034/35	2035/36 – 2039/40
Indicative development capacity:	Net residential units: 72		Gross non-residential floorspace: Employment 0 Main town centre 2,474	

Commented [SA429]: Factual update – the site has been removed from the Plan as parts of the building are due to be refurbished

~~**Site allocation**~~

~~Mixed-use redevelopment with residential and community uses, along with ancillary main town centre uses. Public realm enhancements, including improved access to Surrey Canal Linear Park.~~

~~**Opportunities**~~

~~The site comprises mainly of the Riverside Youth Club and 2000 Community Action Centre. Redevelopment and site intensification, along with the introduction of housing, will provide a more optimal use of land and enable enhancements to community facilities. Development will also enable public realm enhancements, including improved access to the Surrey Canal Linear Park from Grove Street.~~

~~**Development requirements**~~

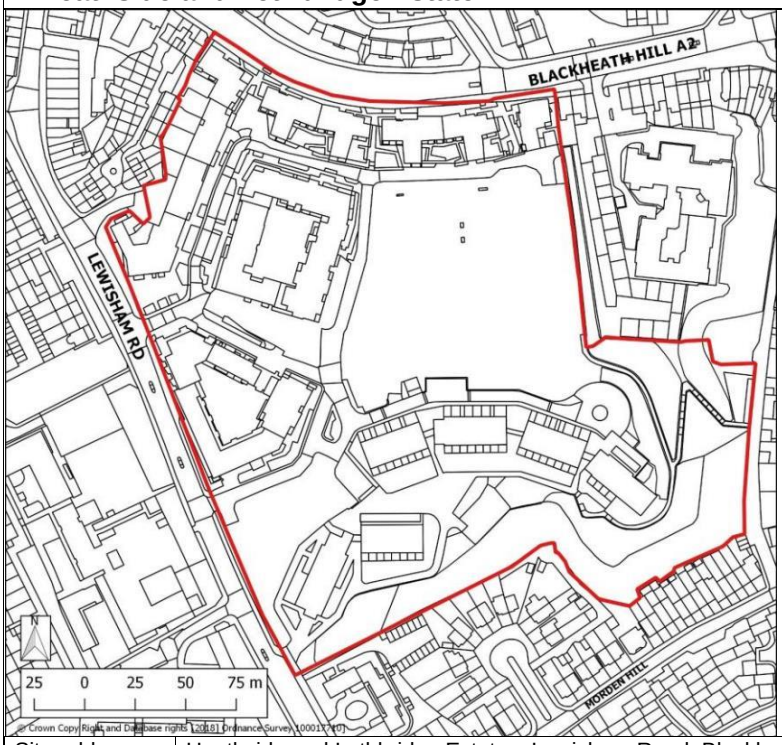
- ~~Appropriate re-provision of the existing community facilities, in line with Policy CI 1 (Safeguarding and securing community infrastructure).~~
- ~~Well-integrated and high quality community facilities, including publicly accessible play space.~~
- ~~Main town centre uses must be ancillary to the main residential and community use(s).Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including access improvements to Surrey Canal Linear Park.~~
- ~~Positive frontages along Grove Street and Oxestalls Road, with active ground floor frontages where commercial uses are integrated..~~

~~**Development guidelines**~~

- ~~The design of the development should take into consideration the proximity of the Eddystone Tower to the west of the site and the proposed development immediately south of the site, at The Timber Yard, Oxestalls Road.~~
- ~~The design of new buildings on the site should be in keeping with the heights of the existing buildings immediately to the north and east of the site, taking into account amenity impacts.~~
- ~~Landscaping should be designed as an integral part of the development, with an enhanced relationship with the existing adjoining public open space, with improved routes leading to the Surrey Canal Linear Park~~
- ~~Development should be designed to retain existing vehicular access onto Grove Street.~~
- ~~Applicants should consult with Transport for London with respect to the existing bus stop at Grove Street.~~

East Area

1 Heathside and Lethbridge Estate



Site address:	Heathside and Lethbridge Estates, Lewisham Road, Blackheath Hill, London, SE10			
Site details:	Site size (ha): 6.07, Setting: Urban, PTAL: In 2015: 2-5, In 2021: 2-5, In 2031: 2-5, Ownership: Public, Current use: Housing estate			
How site was identified:	London SHLAA (2017)			
Planning designations and site considerations:	Opportunity Area, adjacent Conservation Area, Archaeological Priority Area, Site of Importance for Nature Conservation, Strategic Open Space, Air Quality Management Area, Air Quality Focus Area, Flood Zone 1, Groundwater Source Protection Zone 1.			
Planning Status:	Outline application DC/09/072554 granted March 2010. Various subsequent applications granted up to April 2019. Phases 1-4 have been completed and have delivered 782 residential units. Phases 5 and 6 consisting of 443 units are currently under construction ~~Construction started and development is partially complete.~~			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10 ~~Yes~~	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units for whole site: 443 660		Gross non-residential floorspace: Employment 0 Main town centre ~~0~~ 1,280	
Remaining net units to be built:	443			

Commented [SA430]: Factual update on designations

Commented [SA431]: Factual update – providing additional details on flood risk

Commented [SA432]: Factual update – on the progress made in redeveloping the site

Commented [SA433]: Capacities amended to reflect the planning consents granted for the site

Existing planning consent

DC/09/072554 as amended by DC/10/075627, DC/10/075395, DC/10/075536, DC/12/081165, DC/12/081169, DC/14/087835, DC/14/087333, DC/14/087335, DC/15/090624, DC/15/092670, DC/17/101616, DC/17/101686, DC/17/104709, DC/18/106053, ~~and~~ DC/18/107715 and 19/111861, - for 512 square metres of retail floorspace, 768 square metres of community floorspace, an energy centre and buildings ranging from 3 to 17 storeys in height, together with car and cycle parking, associated highway infrastructure, public realm works and provision of open space; and phase 1 (138 residential units), phase 2 (190 units), phase 3 (218 units), phase 4 (236 units), phase 5 (284 units) and phase 6 (159 units).

Commented [SA434]: Factual update – to reflect planning consent granted on the site

Site allocation

Comprehensive regeneration of 565 existing residential units within a housing estate ~~comprising~~ to provide 1,225 residential units (net 660), community and ancillary main town centre uses. Redevelopment of existing buildings and spaces to facilitate a new layout with new and improved routes, both into and through the site, along with open space, public realm and environmental enhancements.

Commented [SA435]: Amended for clarity - to acknowledge the existing residential units and the gross residential capacity of the site

Opportunities

The Heathside and Lethbridge estate is located to the north of Lewisham major town centre and situated within a predominantly residential area. A Site of Importance for Nature Conservation is located at the eastern and south eastern boundaries. Regeneration of the housing estate is currently in progress, with the some phases now built and construction started on the remaining phases. Regeneration of the estate will secure a new high quality residential area including affordable housing, community facilities and public realm enhancements.

Development requirements

1. The site must be re-integrated with the surrounding street network to improve access and permeability into and through the site, as well as the surrounding area.
2. Delivery of new and improved public realm, including new public open space as a central design feature,
3. Provision of community facilities, in line with Policy CI 1 (Safeguarding and securing community infrastructure).
4. Development proposals must protect and seek to enhance green infrastructure, including the SINC.

Development guidelines

1. The remaining phases should be designed to respond positively to the surrounding residential area. This includes integration of perimeter blocks with views through to internal courtyards, along with through-routes between Blackheath Hill and Lewisham Road, ~~-~~
2. Site topography should be addressed to ensure that taller elements are located and designed to avoid adverse impacts on local character. This includes consideration of the Blackheath Conservation Area, along with Listed Buildings and Locally Listed Buildings to the east of the site, on Dartmouth Row.
3. The design of development should respond positively to the character of existing residential properties surrounding the site. In particular, the heights and style of adjacent properties within the Blackheath Conservation Area to the south and east of

the site and the Listed Buildings and Locally Listed Buildings to the east of the site, on Dartmouth Row.

4. Development should have regard to the woodland area designated as SINC along the eastern and southern site boundaries.

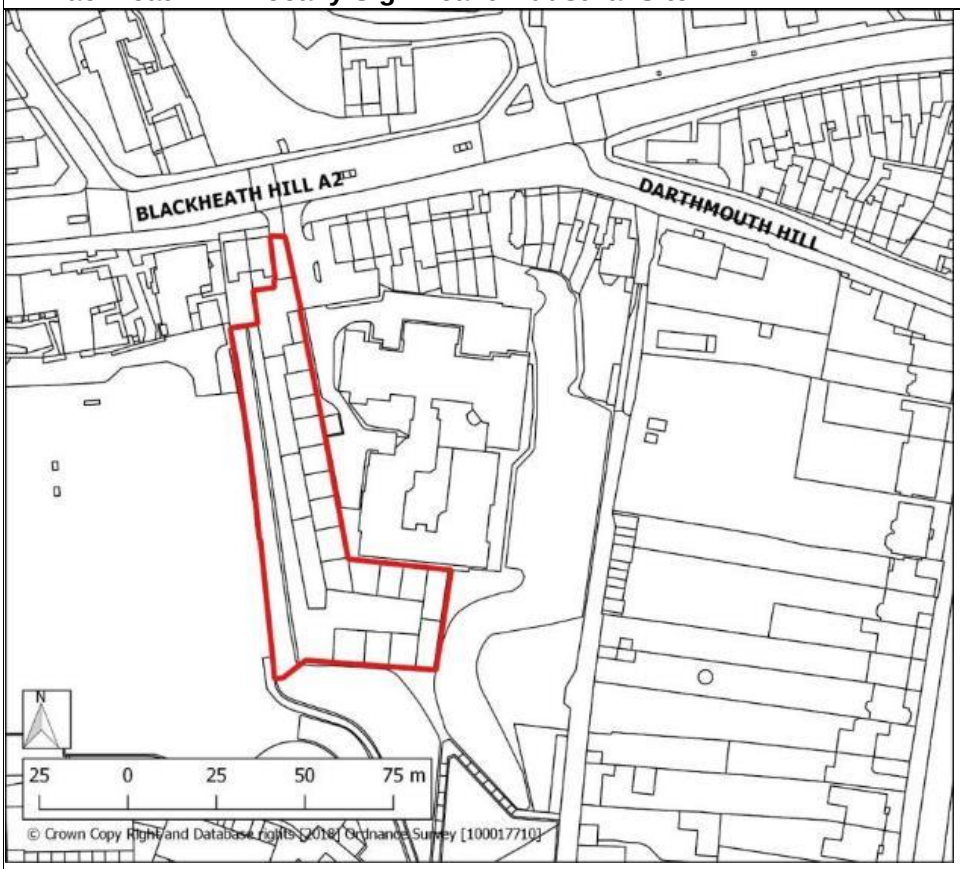
5. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

6. Applicants should work in partnership with Thames Water to manage surface water and divert existing sewers where applicable.

Commented [SA436]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA437]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

2 Blackheath Hill Locally Significant Industrial Site



Site address:	Blackheath Business Centre, Blackheath Hill, Blackheath, London, SE10 8BA			
Site details:	Site size (ha): 0.31, Setting: Urban, PTAL: In 2015: 3, In 2021: 3, In 2031: 3, Ownership: Private, Current use: Industrial			
How site was identified:	Site Allocations Local Plan (2013) and Lewisham Call for Sites (2015 and 2018)			
Planning designations and site considerations:	Opportunity Area, Locally Significant Industrial Site, Archaeological Priority Area, adjacent Site of Importance for Nature Conservation, adjacent to Strategic Open Space, Air Quality Management Area , Air Quality Focus Area, Flood Zone 1, Groundwater Source Protection Zone 1			
Planning Status:	~~None~~Full application DC/20/117309 granted in April 2021			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10	Years 11-15 ~~Yes~~	Beyond 15 years
Indicative development capacity:	Net residential units: ~~30~~ 63		Gross non-residential floorspace: Employment ~~1,038~~2,288 Main town centre 0	

Commented [SA438]: Factual update on designations

Commented [SA439]: Factual update – providing additional details on flood risk

Commented [SA440]: Factual update – on the progress made in redeveloping the site

Commented [SA441]: Capacities amended to reflect the planning consent granted for the site

Existing planning consent

DC/20/117309 – Full application for the r~~R~~edevelopment of the site to provide a mixed-use scheme comprising a residential building consisting of 63 flats and 2,888m^2 flexible light industrial space in a separate building.

Site allocation

Comprehensive employment-led redevelopment. Co-location of compatible commercial and residential uses.

Opportunities

The site comprises the Blackheath Hill Locally Significant Industrial Site. Redevelopment and site intensification, along with the co-location of commercial and other uses, will provide a more optimal use of the land and enable the delivery of new and improved workspace to support the long-term viability of the LSIS. Development will also provide public realm and environmental enhancements to improve local area amenity.

Development requirements

1. All development must be delivered in accordance with a masterplan, to ensure the appropriate co-location, phasing and balance of employment and other uses across the site, in line with Policy DM3 (Masterplans and comprehensive development).
2. Development must not result in a net loss of industrial capacity, or compromise the function~~al integrity~~ of the employment location, in line with Policy ~~EC 5~~EC6 (Locally Significant Industrial Sites).
3. Development proposals must protect and seek to enhance green infrastructure, including the SINC that abuts the site at its south and eastern boundaries.

Development guidelines

1. Non-employment uses, including residential uses, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses.
2. Development should be designed having regard to the heritage assets adjacent to the site, including the setting of the Blackheath Conservation Area, as well as Listed and Locally Listed Buildings to the east, on Dartmouth Row.
3. The irregular shape of the site will require careful consideration of site access and layout, particularly for commercial and servicing vehicles.
4. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.
5. Applicants should work in partnership with Thames Water to minimise impacts on groundwater, manage surface water and divert existing sewers where applicable.

Commented [SA442]: Factual update – to reflect planning consent granted for the site.

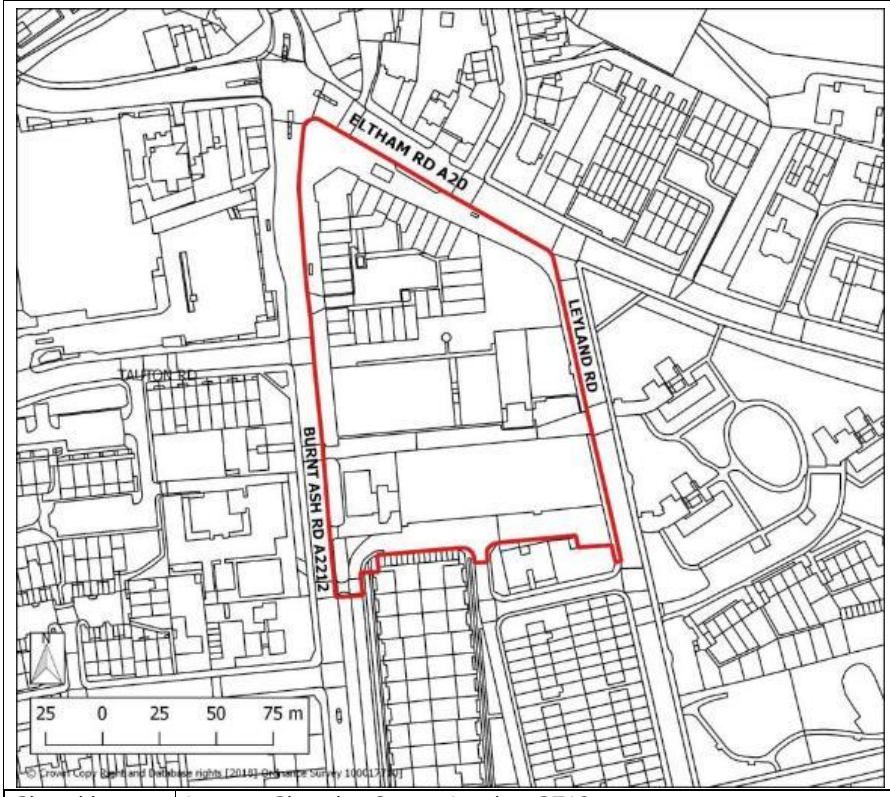
Commented [SA443]: Amended for clarity and to aid policy implementation.

Commented [SA444]: Factual update – to reflect new policy numbers in Regulation 19 plan

Commented [SA445]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA446]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

3 Leegate Shopping Centre



Site address:	Leegate Shopping Centre, London, SE12			
Site details:	Site size (ha): 1.90, Setting: Urban, PTAL: In 2015: 3, In 2021: 3, In 2031: 3, Ownership: Private, Current use: Main town centre uses, Retail, Employment, Residential, Car park			
How site was identified:	Site Allocation Local Plan (2013) and London SHLAA (2017)			
Planning designations and site considerations:	Growth Node, Appropriate Location for Tall Buildings, ~~a~~Adjacent to Conservation Area, District Centre, Primary Shopping Area, Air Quality Management Area, Flood Zone ~~3a~~1, 2, 3, Groundwater Source Protection Zone 2			
Planning Status:	Full application DC/14/090032 received resolution to grant permission in May 2016. ~~New f~~Full application DC/18/107468 submitted in June 2018 was not determined. Pre-application. New application to be submitted ~~in~~ 2022.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10 Yes	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: 450		Gross non-residential floorspace: Employment 805 Main town centre 5,449	

Commented [SA447]: Factual update on designations

Commented [SA448]: Factual update – providing additional details on flood risk

Commented [SA449]: Factual update – on the progress made in redeveloping the site

Commented [SA450]: Capacities remain the same as Regulation 18 plan

Existing planning consent

DC/14/090032 - proposed development at Leegate Shopping Centre for the demolition of the existing buildings and redevelopment to provide a retail led mixed use development, including residential (Use Class C3), food store (Use Class A1), retail units (Use Class A1-A4), assembly and leisure (Use Class D2), non-residential institutions (Use Class D1), public realm, associated car and cycle parking ~~parking~~, highways and access works and landscaping. This application received a resolution to grant permission but the section 106 was not agreed.

~~**DC/18/107468** – Full application was submitted in June 2018 but has not yet been determined.~~

DC/18/107468 – Full application was submitted in June 2018 but was not determined.

Site allocation

Comprehensive mixed-use redevelopment of existing shopping centre comprising compatible main town centre, commercial, community and residential uses. Redevelopment of existing buildings and reconfiguration of spaces to facilitate a street-based layout with new and improved routes, both into and through the site, along with public open space and public realm enhancements.

Opportunities

This site takes up a prominent position within Lee Green district town centre. It is currently occupied by the 1960s Leegate Shopping Centre, two office blocks (Leegate House and Cantilever House), a multi-level car park, a community centre and housing. It is key to the renewal and revitalisation of the town centre, and will play a critical role in linking sites and neighbourhoods surrounding it. Comprehensive redevelopment will deliver a significant amount of new housing together with modern retail and employment space, leisure, community and cultural facilities to support the long-term vitality and viability of the town centre. Development will also enable public realm enhancements to improve connections to and through the area.

Development requirements

1. 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 existing buildings and spaces to achieve a hierarchy of routes with clearly articulated east-west and north-south corridors.
2. Positive frontages, with active ground floor frontages within the Primary Shopping Area and along key routes.
3. Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy.
4. ~~3.~~ Provision of community infrastructure to meet demand arising from the development, including a new health facility in partnership with the CCG, NHS and other health bodies.

Commented [SA451]: Amended for clarity, to encourage community infrastructure in line with rising demand

Development guidelines

1. Careful consideration must be given to the integration of walking and cycle routes through the site to Eltham Road, Burnt Ash Road, Leyland Road and Taunton Road.
2. ~~1.~~ Development should make provision for a range of floorplate sizes to accommodate a variety of main town centre uses.

~~2.~~3. Development should make more optimal use of the land by reviewing options for the existing multi-storey car park. ~~Car parking provision should be the minimum required to maintain the viability of the town centre, whilst also reflecting publictransport accessibility levels.~~

4. Public realm should be redistributed across the site, with a new public square set back from Burnt Ash Road. Consideration should be given to external seating areas, landscaping and playspace as well as communal courtyard gardens, private amenity spaces and improved public realm along Eltham Road and Burnt Ash Road.

5. Development should contribute to a healthy streets corridor and take account of the strategic cycle routes running north-south along B212 Lee Road and A2212 Burnt Ash Road/Baring Road and east-west along A20 Lee High Road/Eltham Road.

~~3.~~6. Large canopy tree planting on south east corner and along Burnt Ash Road should be used to improve the public realm and link the Burnt Ash Road Avenue of trees on the opposite side of the street with the mature trees on the site.

7. Development should take account of a Grade II listed fire station and a locally listed Old Tigers Head Pub and seek to reinstate connections to Lee Green's historic past, rather than replicating the busy traffic junction that now dominates the area. The local history information board that currently exists on the south east side of the site should be protected or replaced and incorporated into the new scheme.

8. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

9. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. New connections into the trunk sewer will not be allowed.

Commented [SA452]: Repetition - removed to ensure clarity in policy implementation - Car parking standards are set out in Policy TR4

Commented [SA453]: Respond to consultation – request to refer to healthy Streets corridor and specific cycle routes

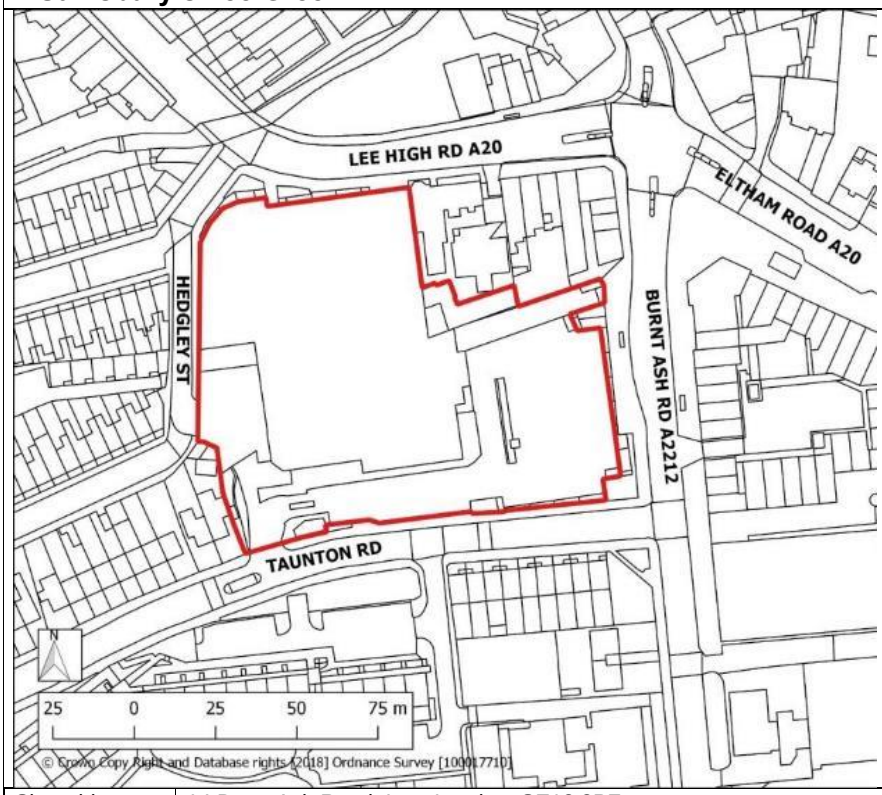
Commented [SA454]: Amended for clarity and respond to consultation – request to reference tree planting along Burnt Ash Road

Commented [SA455]: Respond to consultation – request to refer to heritage assets

Commented [SA456]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA457]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

4 Sainsbury's Lee Green



Site address:	14 Burnt Ash Road, Lee, London, SE12 8PZ			
Site details:	Site size (ha): 1.05, Setting: Urban, PTAL: In 2015: 3, In 2021: 3, In 2031: 3, Ownership: Private, Current use: Main town centre uses, Retail, Car park			
How site was identified:	London SHLAA (2017) and Strategic Planning Team (2019)			
Planning designations and site considerations:	Growth Node, Appropriate Location for Tall Buildings, Archaeological Priority Area, adjacent Conservation Area, District Centre, Primary Shopping Area, Air Quality Management Area, Area of Special Local Character, Flood Zones ~~1, 2, 3a~~3, River Quaggy nearby, Groundwater Source Protection Zone 2, adjacent Listed Building			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 Yes	Beyond 15 years ~~Yes~~
Indicative development capacity:	Net residential units: ~~120~~ 111		Gross non-residential floorspace: Employment ~~0~~ 625 Main town centre 4,123	

Commented [SA458]: Factual update on designations

Commented [SA459]: Factual update – providing additional details on flood risk

Commented [SA460]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details

Site allocation

Comprehensive mixed-use redevelopment with compatible main town centre, commercial and residential uses. Reconfiguration of existing buildings and spaces to facilitate new and improved routes, both into and through the site, along with public realm enhancements.

Opportunities

This site takes up a prominent position within Lee Green district town centre. It is currently occupied by a large format retail building and surface level car parking. Comprehensive redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the long-term vitality and viability of the town centre. Redevelopment will also enable public realm enhancements, better connecting the site to its immediate surrounds and wider town centre area.

Development requirements

1. The site must be re-integrated with the surrounding street network to improve access and permeability into and through the town centre, with enhanced walking and cycle connections between public spaces and the site's surrounding neighbourhoods. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors.
2. Positive frontages, with active ground floor frontages within the Primary Shopping Area and along key routes.
3. Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy.

Development guidelines

1. Development should make provision for a range of floorplate sizes to accommodate a variety of main town centre uses and allow for the ~~retention or~~ re-provision of ~~the existing~~ a supermarket.
2. Development should make more optimal use of the land by reviewing options for the existing car park. ~~Car parking provision should be the minimum required to maintain the viability of the town centre, whilst also reflecting the public transport accessibility levels.~~
3. Development should be designed to enhance movement by walking and cycling~~-~~, with improved permeability through the site, in particular providing new routes between Hedgley Street, Brightfield Road, Taunton Road and Lee High Road.
4. Development should contribute to a healthy streets corridor and take account of the strategic cycle routes running north-south along B212 Lee Road and A2212 Burnt Ash Road/Baring Road and east-west along A20 Lee High Road/Eltham Road.

~~3.~~5. Development should create a positive frontage along Burnt Ash Road and Lee High Road, aligned with adjacent properties. Tree planting should be introduced to improve amenity and the public realm, filling in the gaps in the avenue of trees on Burnt Ash Road.

~~4.~~6. Development should respond positively to the adjoining Lee Manor Conservation Area and the Grade II Listed Building Police Station.

~~5.~~7. Staggered building heights should be used to respect the surroundings, with smaller grained development in the western side of the site to avoid overshadowing of existing residential units along Brightfield Road and with taller buildings located along the

Commented [SA461]: Respond to consultation – request to refer to re-provision of the retail store

Commented [SA462]: Repetition - removed to ensure clarity in policy implementation - Car parking standards are set out in Policy TR4

Commented [SA463]: Respond to consultation – request to refer to Healthy Streets corridor and specific cycle routes

southern edge and in the north eastern corner of the site, away from the Listed Building.

8. Development should take account of a locally listed Old Tigers Head Pub and seek to reinstate connections to Lee Green's historic past, rather than replicating the busy traffic junction that now dominates the area.

9. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

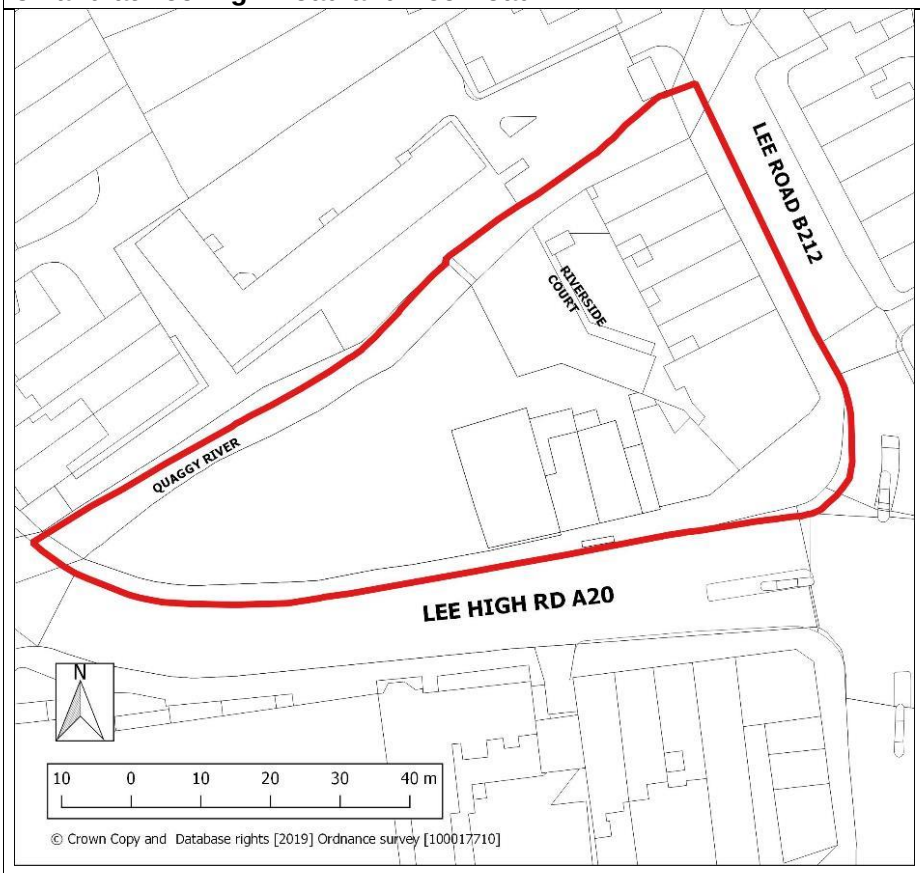
10. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan.

Commented [SA464]: Respond to consultation – request to refer to heritage assets

Commented [SA465]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA466]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

5 Land at Lee High Road and Lee Road



Site address:	Lee High Road and Lee Road, SE12 8RU			
Site details:	Site size (ha): 0.43, Setting: Urban, PTAL: In 2015: 3, In 2021: 3 In 2031: 3 Ownership: Private, Current use: Commercial, Residential			
How site was identified:	London SHLAA (2017) and Strategic Planning Team (2019)			
Planning designations and site considerations:	-Growth Node, Archaeological Priority Area, District Centre, Primary Shopping Area, Air Quality Management Area-, Area of Special Local Character, Locally Listed Building on site, within 30m buffer of electricity cable, Flood Zone 3, adjacent to Rivers Quaggy and Kidbrooke, Groundwater Source Protection Zone 2			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15	Beyond 15 years Yes
Indicative development capacity:	Net residential units: 55		Gross non-residential floorspace: Employment 256 Main town centre 1,023	

Commented [SA467]: Factual update on designations

Commented [SA468]: Factual update – providing additional details on flood risk

Commented [SA469]: Capacities remain the same as Regulation 18 plan

Site allocation

Mixed-use redevelopment of existing car dealers comprising compatible main town centre and residential uses. Public realm enhancements including improved access to the River Quaggy.

Opportunities

This site is located within Lee Green district town centre. The western part of the site is occupied by a car dealers and its associated showroom ~~-~~parking. The eastern part of the site comprises a terrace of properties with a mix of residential and main town centre uses, including a locally listed public house, and is an integral feature of the townscape. The River Quaggy runs along the back of the site. Redevelopment and site intensification, along with the introduction of a wider range of uses, can provide a more optimal use of land to support the long-term vitality and viability of the town centre. Redevelopment can also enable public realm enhancements, with improved access to the River Quaggy.

Commented [SA470]: Factual update – to reflect the correct heritage status of the public house

Development requirements

1. Retention of the existing terrace of properties at the eastern part of the site, including the locally listed public house.

Commented [SA471]: Factual update – to reflect the correct heritage status of the public house

2. Positive frontages with active ground floor frontages within the Primary Shopping Area, including at Lee High Road.
3. Delivery of new and improved public realm, in accordance with a site-wide public realm strategy, including:
    a. Improvements to enhance access to and amenity value of the River Quaggy, taking into account the River Corridor Improvement Plan SPD.
    b. Along Lee High Road and Lee Road, improvements to the forecourt at the road junction

Commented [SA472]: Amended for clarity and to aid policy implementation

4. Enhance access to the River Quaggy which runs along the northern edge of the site, and to improve its ecological quality and amenity value.

Commented [SA473]: Respond to consultation – request to refer to the River Quaggy

Development guidelines

1. The design of development should respond positively to the existing terrace at the eastern edge of the site, and protect the street scene along Lee Road.

Commented [SA474]: Amended for clarity

2. ~~-~~Development should contribute to a healthy streets corridor and take account of the strategic cycle routes running north-south along B212 Lee Road and A2212 Burnt Ash Road/Baring Road and east-west along A20 Lee High Road/Eltham Road.

Commented [SA475]: Respond to consultation – request to refer to Healthy Streets corridor and to specific cycle routes

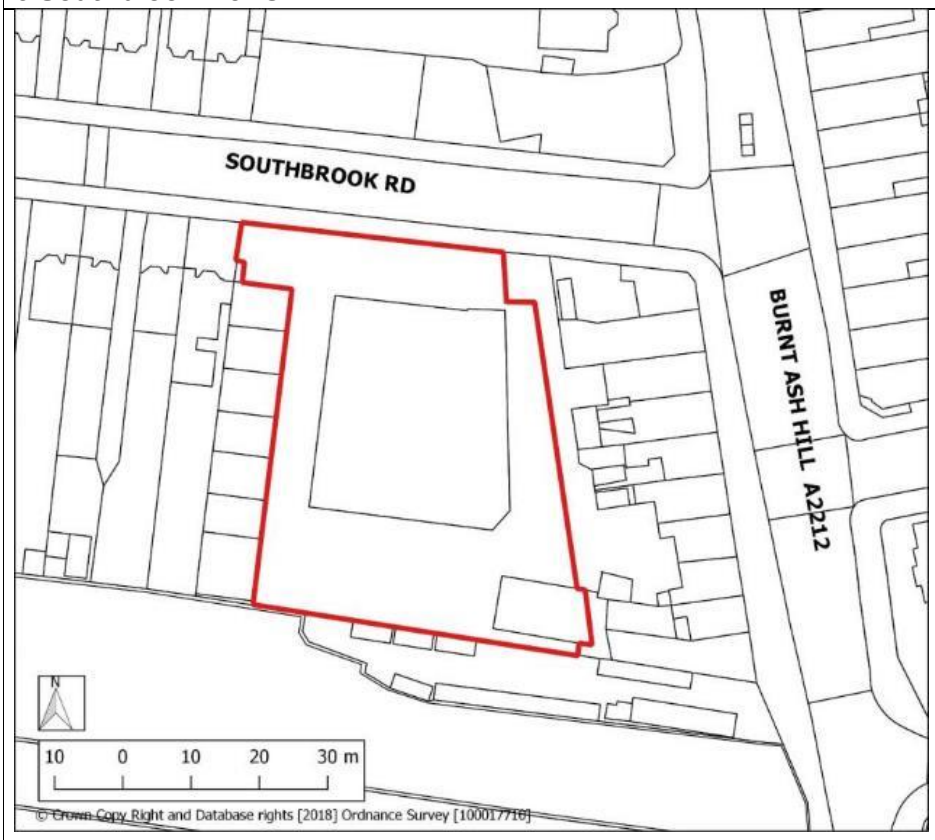
3. ~~Development should be designed to enhance access to the River Quaggy which runs along the northern edge of the site, and to improve its ecological quality and amenity value.~~Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.

Commented [SA476]: Respond to consultation – Environment Agency request to provide text relating to flood risk

~~1.~~4. Development should take account of a locally listed Old Tigers Head Pub and seek to reinstate connections to Lee Green's historic past, rather than replicating the busy traffic junction that now dominates the area.

Commented [SA477]: Respond to consultation – request to enhance the heritage of the site

6 Southbrook Mews



Site address:	Southbrook Mews, Lee, London, SE12 8LG			
Site details:	Site size (ha): 0.24, Setting: Urban, PTAL: In 2015: 3, In 2021: 2-3, In 2031: 2-3, Ownership: Private, Current use: Employment, Commercial			
How site was identified:	Strategic Planning Team (2019)			
Planning designations and site considerations:	Growth Node, Adjacent to Strategic Open Space, Conservation Area, adjacent Site of Importance for Nature Conservation, adjacent Local Centre, Air Quality Management Area, Flood Zone 1, Groundwater Source Protection Zone 2, adjacent 5 locally listed buildings, within 30m of an electricity cable			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15	Beyond 15 years Yes
Indicative development capacity:	Net residential units: 23		Gross non-residential floorspace: Employment 804 Main town centre 0	

Commented [SA478]: Factual update on designations

Commented [SA479]: Factual update – providing additional details on flood risk

Commented [SA480]: Capacities remain the same as Regulation 18 plan

Site allocation

Employment led mixed-used redevelopment with compatible commercial, main town centre and residential uses.

Opportunities

This site comprises a non-designated employment site which is located adjacent to Burnt Ash local centre. Redevelopment and site intensification, along with the introduction of a wider range of uses, will enable the delivery of new and improved workspace and help to support the long-term vitality and viability of the local centre. Development will also provide public realm enhancements that improve local area amenity, with potential new access to Lee station.

Development requirements

1. The maximum viable amount of employment floorspace must be re-provided, in line with Policy ~~EC7~~ EC8 (Non-designated employment sites).
2. A positive frontage and public realm improvements along Southbrook Road.
3. Investigate opportunities to, and where feasible, improve access to Lee station by creating a new access to the site at its south east corner.
4. Development must protect and seek to enhance green infrastructure, including the SINC and green corridor along the railway embankment.

Development guidelines

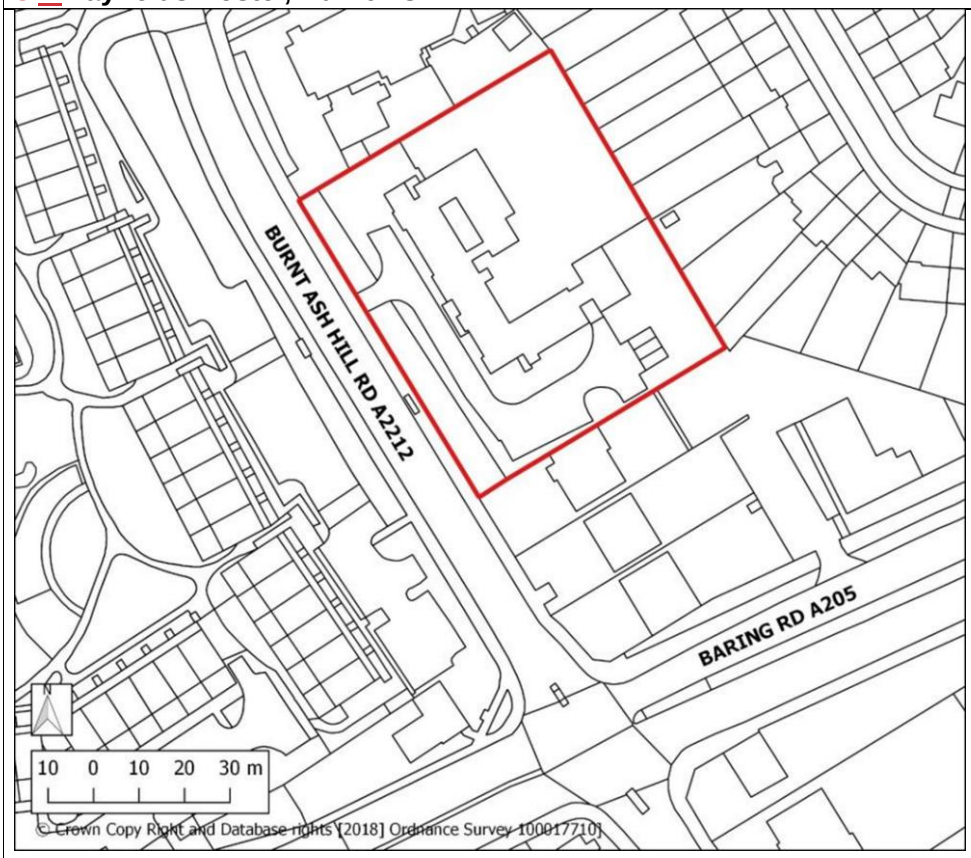
1. There may be scope for the integration of main town centre uses, but these uses should be restricted to the frontage along Southbrook Road and function to complement the existing provision at Burnt Ash local centre.
2. Non-employment uses, including residential uses, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses.
3. Building heights should be staggered, with taller elements located away from existing residential properties, the locally listed Northbrook Public House and the locally listed two storey mews building. Taller elements will be more appropriately located adjacent to the railway in the southern part of the site.
4. ~~4.~~ Opportunities should be investigated to remove the boundary wall.
5. Screening or communal amenity space should be considered to shield the back of existing properties on Burnt Ash Road.
6. In order to support commercial uses, development should be designed to ensure vehicular access from Southbrook Road.
7. Development should contribute to a ~~h~~Healthy ~~s~~Streets corridor and take account of the strategic cycle routes running north-south along A2212 Burnt Ash Hill/Baring Road.
8. Development should respond positively to the Lee Manor Conservation Area and the locally listed buildings adjacent to the site.
9. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan.

Commented [SA481]: Factual update – to reflect new policy numbers in Regulation 19 plan

Commented [SA482]: Respond to consultation – request to make reference to Healthy Streets corridor and cycle routes

Commented [SA483]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~8~~ 7 Mayfields Hostel, Burnt Ash Hill



Site address:	Mayfields Hostel, 47 Burnt Ash Hill, London, SE12 0AE			
Site details:	Site size (ha): 0.49, Setting: Central, PTAL: In 2015: 2-3, In 2021: 2-3, In 2031: 2-3, Ownership: Public, Current use: Hostel			
How site was identified:	London SHLAA (2017)			
Planning designations and site considerations:	Growth Corridor, Adjacent Local Centre, Air Quality Management Area , Air Quality Focus Area, Flood Zone 1, Groundwater Source Protection Zone 2, Critical Drainage Area			
Planning Status:	None, consent has lapsed~~Full application DC/17/103886 granted in August 2018~~			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10 ~~Yes~~	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~47~~ 21		Gross non-residential floorspace: Employment 0 Main town centre 0	

Commented [SA484]: Factual update on designations

Commented [SA485]: Factual update – providing additional details on flood risk

Commented [SA486]: Factual update – on the progress made in redeveloping the site

Commented [SA487]: Capacities amended to reflect the lapsed planning consent granted for the site for 47 units. The 26 existing units have been removed to provide a net figure of 21 units.

Existing planning consent

DC/17/103886 ~~-~~– Full application has lapsed for the ~~The~~ demolition of the existing hostel and the construction of a five/six storey building comprising 24 two bedroom, 16 three bedroomed self-contained flats, a two storey commercial space (flexible use classes A1 / A2 / A3 / B1(a) / D1 (crèche, education, museum, art gallery) and 7 two storey houses at Mayfields 47 Burnt Ash Hill, disabled car parking and bicycle spaces, bins storage and associated landscaping.

Site allocation

Residential-led mixed use redevelopment with compatible residential, main town centre, commercial and community uses.

Opportunities

This site is located on Burnt Ash Hill, south of Burnt Ash local centre. It is currently occupied by Mayfields Hostel providing 26 exiting specialist accommodation units. Redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land and facilitate the re-provision of high quality housing, along with delivering new services and/or community facilities.

Commented [SA488]: Factual update – to reflect existing use of the site

Development requirements

1. Development must make provision for an appropriate mix of non-residential uses, including community and cultural uses, which are ancillary to and complement the principal residential use.
2. Delivery of new and improved public realm, in accordance with a site-wide public realm strategy.
3. Retention of ~~eisting~~existing mature trees and trees of value.
4. A positive frontage along Burnt Ash Hill.

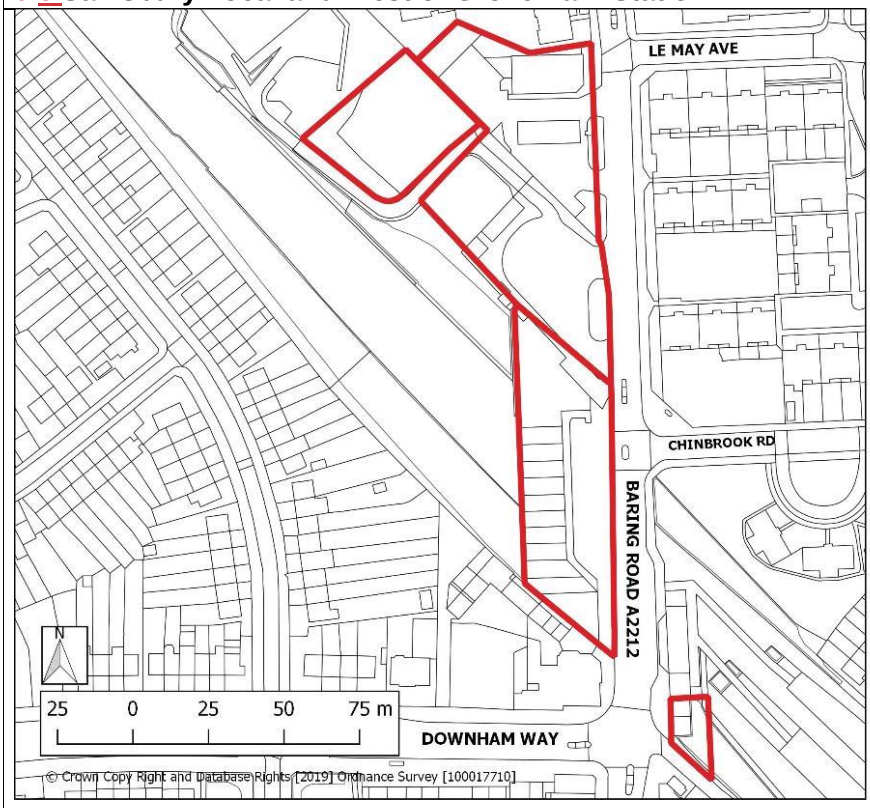
Development guidelines

1. The design of development should respond positively to the character of the site surroundings, including the adjacent church and residential development on Pitfold Road and Burnt Ash Hill.
2. Development should be set back from Burnt Ash Hill to ensure alignment with adjacent properties and the retention of the existing line of mature trees.
3. Development should contribute to a H~~h~~ealthy ~~s~~Streets corridor and take account of the strategic cycle routes running north-south along A2212 Burnt Ash Hill/Baring Road.
4. Landscaping should contribute positively to the setting of the area, including the existing mature tree planting to the north, east and west boundaries.
5. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan.

Commented [SA489]: Respond to consultation – request to make reference to Healthy Streets corridor and cycle routes

Commented [SA490]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~9~~ ~~8~~ Sainsbury Local and West of Grove Park Station



Site address:	Sainsbury's Local and West of Grove Park Station, London, SE12 0DU			
Site details:	Site size (ha): 0.90, Setting: Urban, PTAL: In 2015: 5, In 2021: 6a, In 2031: 6a, Ownership: Private, Current use: Main town centre uses, Retail, Transport, Garage, Car park			
How site was identified:	London SHLAA (2017), Strategic Planning Team (2019) and landowner engagement (2019)			
Planning designations and site considerations:	Growth Node, Local Centre, Strategic Area of Regeneration, adjacent to Strategic Open Space, Flood Zone 1, Groundwater Source Protection Zone 3, Critical Drainage Area			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 ~~Yes~~	Beyond 15 years Yes
Indicative development capacity:	Net residential units: 78		Gross non-residential floorspace: Employment 362 Main town centre 1,449	

Commented [SA491]: Factual update on designations

Commented [SA492]: Factual update – providing additional details on flood risk

Commented [SA493]: Capacities remain the same as Regulation 18 plan

Site allocation

Mixed-use redevelopment with compatible main town centre, commercial and residential uses. Public realm enhancements including improvements to the Grove Park station approach.

Opportunities

The site allocation comprises of a number of sites located within Grove Park local centre, which are situated in proximity to Grove Park station. The sites are currently occupied by a range of main town centre uses along with a petrol station, bus station and housing. Comprehensive redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the long-term vitality and viability of the local centre. Redevelopment can also enable public realm enhancements, including improvements to the station approach.

Development requirements

1. The site must be well integrated with the surrounding street network to improve access and permeability through the centre, and along the station approach.
2. Positive frontage with active ground floor frontages along Baring Road.
3. Applicants must consult with Transport for London to investigate options for the existing bus station, including retention or appropriate re-provision, where necessary.
4. Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy.
5. Development must protect and seek to enhance green infrastructure, including the green corridor along the railway embankment and enhance links to existing green infrastructure such as Chinbrook Meadows and the Grove Park Urban National Park.

Development guidelines

1. The bus ~~garage~~ stand is in operational use. Applicants should consult with Transport for London to investigate future options for the ~~garage~~bus stand, including ~~its~~ the continued ~~use~~operational function of either the existing, or re-provided, bus facility, which the site masterplan should address.
2. Development should contribute to a ~~h~~Healthy S~~s~~treets corridor and take account of the strategic cycle routes running north-south along A2212 Burnt Ash Hill/Baring Road.
3. ~~1.~~ Development must be designed to conserve or enhance the significance of the Grade II Listed Building Baring Hall Hotel, which is a prominent feature within the townscape.
4. The design of development should reflect the historic development of Grove Park, taking into account the early development of an artistic colony.
5. Applicants should work in partnership with Thames Water and engage with them early to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. New connections into the trunk sewer to the north of the site will not be allowed.

Commented [SA494]: Respond to consultation – request to reference green infrastructure

Commented [SA495]: Respond to consultation – request to reference the operational function of the bus stand

Commented [SA496]: Respond to consultation - request to reference healthy streets corridor and specific cycle route

Commented [SA497]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

7 Travis Perkins and Citroen Garage

Site address:	Holme Lacey Road, Lee, London, SE12 0HR			
Site details:	Site size (ha): 0.54, Setting: Urban, PTAL: In 2015: 1b-3, In 2021: 1b-3, In 2031: 1b-3,cOwnership: Private, Current use: Employment, Car services			
How site was identified:	Site Allocations Local Plan (2013), London SHLAA (2017) and Strategic Planning 019)			
Planning designations and site considerations:	Locally Significant Industrial Site, adjacent Conservation Area, adjacent Site of Importance for Nature Conservation, adjacent Local Centre, Air Quality Management Area, Flood Zone 1, Critical Drainage Area, within 30m of an electricity cable			
Planning Status:	None			
Timeframe for delivery:	2020/21 – 2024/25 Yes	2025/26 – 2029/30	2030/31 – 2034/35	2035/36 – 3039/40
Indicative development capacity:	Net residential units: 52		Gross non-residential floorspace: Employment 1,809 Main town centre	

Commented [SA498]: Factual update – the site allocation has been removed from the Plan as the whole site was granted planning consent DC/20/199025 in April 21 for builders merchants and operational yard space.

Site allocation

Comprehensive employment-led redevelopment. Co-location of compatible commercial, residential and main town centre uses. Public realm enhancements including improvements to the Lee station approach.

Opportunities

The site comprises part of the Manor Lane Locally Significant Industrial Site (also known as the Chiltonian Industrial Estate) and adjoining land to the east. It is located in close proximity to Lee station and forms part of the station approach. The western part of the site is currently occupied by a builders' merchants and the eastern part by a car dealers and associated showroom. Redevelopment and site intensification, along with the co-location of commercial and other uses, will provide a more optimal use of land and enable the delivery of new and improved workspace to support long-term viability of the LSIS. Development will also provide public realm enhancements to improve local area amenity, including improvements to the station approach.

Development requirements

- All development must be delivered in accordance with a masterplan to ensure the appropriate co-location of employment and other uses across the site.
- Development must not result in a net loss of industrial capacity, or compromise the functional integrity of the employment location, in line with Policy EC 5 (Locally Significant Industrial Sites).
- Delivery of new and improved public realm, in accordance with a site-wide public realm strategy.
- A positive frontage along Burnt Ash Hill and Holme Lacey Road, particularly to improve legibility and safe access to Lee station.
- Development must protect and seek to enhance green infrastructure, including the SINC and green corridor along the railway embankment

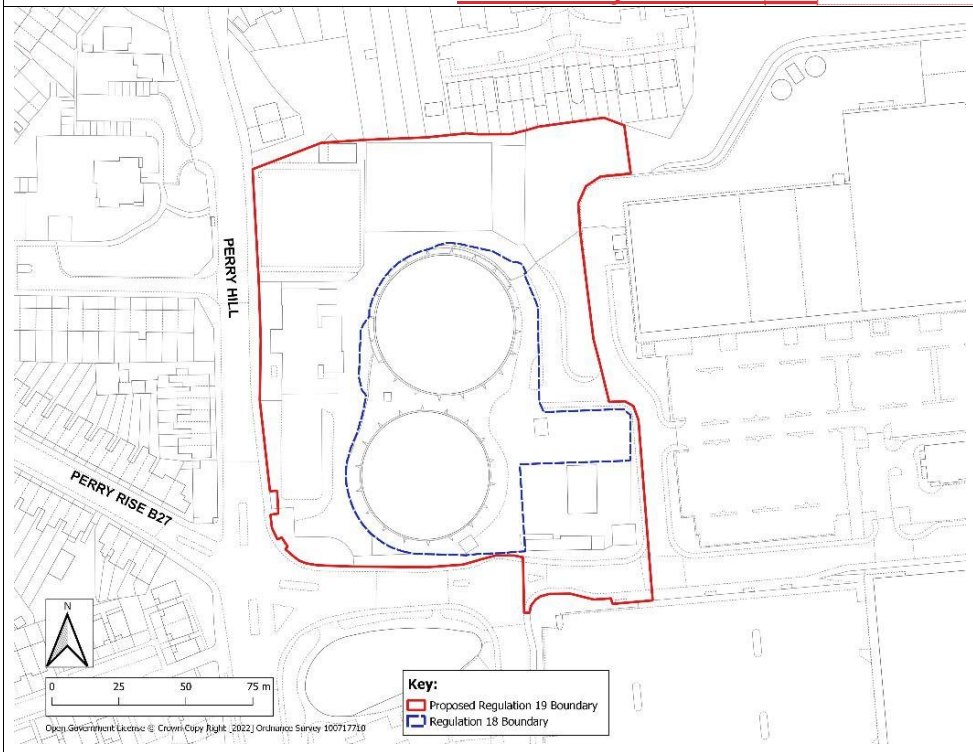
Development guidelines

- Non-employment uses, including residential uses, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses.
- There may be scope for the integration of main town centre uses, but these uses should be restricted to the frontage along Burnt Ash Hill and function to complement the station approach and local centre.
- The Travis Perkins site benefits from a separate access point and segregates it from the rest of the industrial estate and creates a buffer.
- Building heights should be staggered, with taller buildings located away from existing residential properties and adjacent to the railway in the northern part of the site.
- The design of development should enhance the character and appearance of the adjoining Conservation Area. Where possible the setting of the Conservation Area should be enhanced adjacent to the railway bridge by reinstating/exposing the brick bridge revetment.
- Along Holme Lacey Road development should be aligned with adjacent properties and introduce planting to improve amenity. New development should be set back along

~~Burnt Ash Hill, enabling the creation of public realm with tree planting along this frontage and contributing to the vitality of the local centre.~~

South Area

1 Former Bell Green Gas Holders and Livesey Memorial Hall



Site address:	Sydenham Gas Holder ~~Stations~~, ~~Bell Green~~Alan Pegg Place, SE26 4PX			
Site details:	Site size (ha): ~~0.77~~ 2.16 (excluding Livesey Memorial Hall, bo~~l~~wling green and tennis courts 1.66), Setting: Urban, PTAL: In 2015: 2, In 2021: 2, In 2031: 2, Ownership: Private, Current use: Vacant (Former Gas holders) and community facility			
How site was identified:	Site Allocations Local Plan (2013), London SHLAA (2017) and Lewisham Call for Sites (2018)			
Planning designations and site considerations:	Regeneration Node, Appropriate Location For Tall Buildings, Archaeological Priority Area, Strategic Area of Regeneration, ~~South-east London Green Chain Area~~, Air Quality Management Area, Flood Zone 1, Critical Drainage Area, adjacent Listed Building, Locally Listed Building on site, Strategic Open Space			
Planning Status:	~~None~~Pre-application for part of the site.			
Timeframe for delivery:	Years 1-5 Yes	Years 6-10 ~~Yes~~	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~78-178~~100 - 442		Gross non-residential floorspace: Employment ~~782~~465 Main town centre ~~1,563~~1,859	

Commented [SA499]: Respond to consultation – landowner requested that the site boundary be changed and the adjacent landowner requested that the site be extended to include Livesey Memorial Hall and grounds

Commented [SA500]: Factual update on designations

Commented [SA501]: Factual update – on the progress made in redeveloping the site

Commented [SA502]: Capacities amended to reflect revised methodology – see Site Allocations Background Paper Update (2022) for more details.

The higher residential units figure relates to a higher growth scenario associated with the delivery of the BLE and Opportunity Area status.

Site allocation

Comprehensive mixed-use redevelopment with compatible residential, commercial, ~~-~~ main town centre and community uses. Refurbished community facilities in ~~H~~heritage ~~A~~assets at Livesey Memorial Hall site. Public realm and environmental enhancements, including new walking and cycle routes, and public open space.

Opportunities

The site comprises a former gas works that formed a significant landmark in the local area and the site of the Livesey Memorial Hall and grounds. ~~which is now~~The site is largely vacant, with the gasholders having been dismantled, but community uses continue in the Livesey Memorial Hall and grounds. Redevelopment and site intensification, along with the introduction of a ~~wider~~ range of uses, will bring the land back into active use and support local area regeneration. There is scope to facilitate transformational public realm and environmental enhancements in coordination with other sites, and in accordance with an area framework for Bell Green and Lower Sydenham.

Development requirements

1. Landowners must work in partnership and ~~Development must be delivered~~ in accordance with a master plan for ~~the whole of this site and for~~ the wider Bell Green and Lower Sydenham area and including a site masterplan, to ensure appropriate co-location, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development).
2. The site must be fully re-integrated with the surrounding street network, including Perry Hill to the west, Alan Pegg Place to the south and forthcoming development to the east, ~~-~~to improve access and permeability in the local area, with enhanced walking and cycle connections between public spaces and the site's surrounding neighbourhoods. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors.
3. Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy that takes account of, and provides links to, the nearby SINC to the north of the site, and is of beneficial use for local residents without impacting on the on-site heritage assets.
4. Positive frontage on ~~Bell Green Lane~~ Alan Pegg Place and ~~other key routes~~onto the South West Corner at the junction of Alan Pegg Place and Perry Hill.
5. Safeguard land to support delivery of strategic transport infrastructure, including where required for the Bakerloo line extension~~.~~
6. Development must be sensitive to the setting of the listed Livesey Memorial Hall and its curtilage open spaces and structures, and the listed boundary wall and War Memorial, and should incorporate it into the wider townscape by creating a positive relationship with new development
7. ~~5.~~ The history and heritage of the South Suburban Gas Works site should be revealed through a site wide interpretation strategy including the h~~H~~eritage a~~A~~ssets and their curtilage, re-use of the retained elements of the gasholder structures, and through hard and soft landscaping, architecture, public art and street/place naming.

Development guidelines

1. Development should deliver a more cohesive ~~and rational road network and~~ street pattern, in coordination with other neighbouring site allocations. There is an

Commented [SA503]: Respond to consultation – request to reduce employment floorspace

Commented [SA504]: Amended to acknowledge new uses within the heritage assets on the new part of the site, now including in the site allocation

Commented [SA505]: Factual update – to reflect existing use of the Livesey Memorial Hall and grounds

Commented [SA506]: Respond to consultation – request to remove the word wider

Commented [SA507]: Amended for clarity and to aid policy implementation

Commented [SA508]: Amended for clarity

Commented [SA509]: Respond to consultation and amended for clarity, to encourage links to the SINC

Commented [SA510]: Amended for clarity

Commented [SA511]: Amended for clarity, to acknowledge the sensitive settting in the grounds of the Livesey Memorial Hall

Commented [SA512]: Amended for clarity, to encourage enhanced links to heritage on the site

Commented [SA513]: Respond to consultation – request to remove the words rational road network

Commented [SA514]: Amended for clarity, to acknowledge linkages with adjacent development sites

opportunity to open up new ~~east-west and north-south~~ walking and cycle links to the east and south of the site, to create a legible and more permeable network of routes that connect to the surrounding neighbourhood areas. ~~Proposals will be expected to investigate opportunities to reconfigure or remove the gyratory as part of an area-wide strategy.~~

2. To achieve the optimal capacity of the site, development proposals should take into account future public transport accessibility levels, as associated with the Bakerloo ~~line~~ Line extension.

3. Applicants should consider increasing bus services through the site, in partnership with TFL.

4. Development should be designed to provide an appropriate transition in bulk, scale and massing through the site and from the site to its surrounds, which are predominantly suburban in character to the north and west. Tall buildings will not be appropriate in the western part of the site where maintaining the setting of the heritage assets should be prioritised. ~~Tall buildings may be considered along the site's eastern boundary, where they can be designed so as to contribute positively to the streetscene and without detriment to the heritage assets on site.~~

~~Parking provision should reflect future improvements to public transport accessibility levels in the area.~~

5. ~~Development should support the Area of Special Local Character by conserving and enhancing the characteristics that contribute to the area's significance, including the Livesey Memorial Hall and gardens, 'The Bell' public house, and The Old Bath House~~. Development must retain the listed structures at the west of the site and incorporate them sensitively into the redevelopment of the remainder of the site in a way that enhances their setting and improves access to the Livesey Memorial Hall. The hall should continue to be a focal point within the design of the site and be used as a community asset. Public realm and open space should form an integral part of the design of the site, ensuring that the open spaces in the curtilage of the Lively Memorial Hall to the north (bowling green) and south (tennis courts) are retained as open space, ancillary to the use of the hall. Public access through and from the site to the nearby Waterlink Way and SINC should also be integral to the site's layout and design.

6. The site is constrained by existing utilities restrictions, easements; a Hazardous Substances Consent; a former gas holder and significant service infrastructure that supported its former use, including a gas mains and gas 'governor' and a bentonite wall. Ground surveys will need to identify the nature and extent of ground contamination and environmental pollution, with remedial works and/or mitigation measures implemented, where necessary, in partnership with utility providers. The Council recognises the challenges associated with significant decontamination and remediation of the site. ~~, which will need to be considered within the development's viability assessment~~.

7. Development proposals should investigate opportunities to deliver a decentralised energy network.

8. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. New connections into the trunk sewers will not be allowed.

Commented [SA515]: Respond to consultation – request to remove wording relating to the gyratory

Commented [SA516]: Respond to consultation – request to reference bus services

Commented [SA517]: Amended for clarity, to acknowledge that tall buildings will not be suitable across the whole of the site

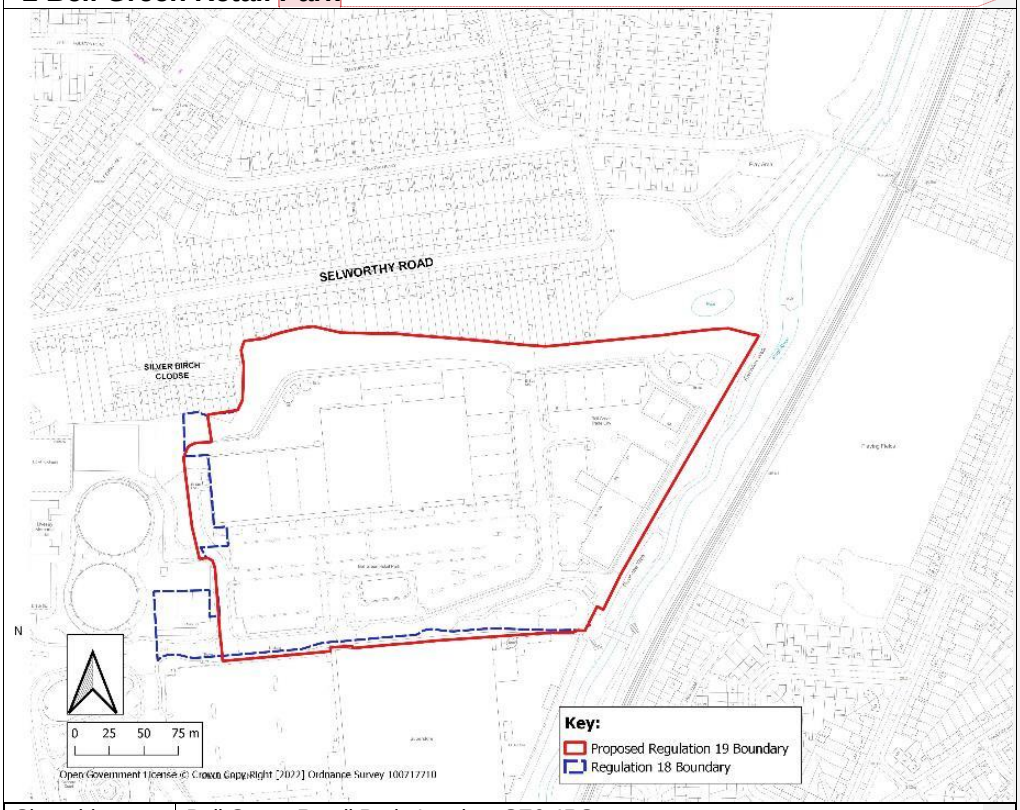
Commented [SA518]: Repetition – removed to ensure clarity in policy implementation - Car parking standards are set out in Policy TR4

Commented [SA519]: Amended for clarity and respond to consultation, to emphasise the heritage importance of the site, the need to retain some elements as open space and links to the SINC and Waterlink Way.

Commented [SA520]: Respond to consultation – request to refer to the utilities constraints and environmental pollution on the site and that decontamination and remediation present challenges to the site's development

Commented [SA521]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

2 Bell Green Retail Park



Site address:	Bell Green Retail Park, London, SE6 4RS
Site details:	Site size (ha): 7.37, Setting: Urban, PTAL: In 2015: 1b-2, In 2021: 1b-2, In 2031: 1b-2, Ownership: Private, Current use: Out of centre retail, Car park
How site was identified:	Site Allocations Local Plan (2013), London SHLAA (2017)
Planning designations and site considerations:	Regeneration Node, Appropriate Location for Tall Buildings, Archaeological Priority Area , Strategic Open Space, Site of Importance for Nature Conservation, Strategic Area of Regeneration, ~~South-east London Green Chain Area,~~ adjacent Waterlink Way, adjacent Metropolitan Open Land, Flood Zones 1 and 2, Critical Drainage Area
Planning Status:	None

Timeframe for delivery:	Years 1-5	Years 6-10 Yes	Years 11-15 Yes	Beyond 15 years ~~Yes~~
Indicative development capacity:	Net residential units: ~~695~~ ~~1,701~~748 - 1,831		Gross non-residential floorspace: Employment ~~7,481~~3,740 Main town centre 14,961	

Commented [SA522]: Boundary amended to match other site allocation boundaries surrounding the site.

Commented [SA523]: Factual update on designations

Commented [SA524]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

The higher residential units figure relates to a higher growth scenario associated with the delivery of the BLE and Opportunity Area status

Site allocation

Comprehensive mixed-use redevelopment of the existing out-of-centre retail park with compatible residential, commercial, main town centre and community uses. Reconfiguration of existing buildings and spaces to facilitate a new layout with improved routes, both into and through the site. Public realm and environmental enhancements, including provision of new walking and cycle routes, public open space and river restoration.

Opportunities

The site comprises an out-of-centre retail park with large format buildings and car parking. Redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land and support local area regeneration. There is scope to facilitate transformational public realm and environmental enhancements in coordination with other sites, and in accordance with an area framework for Bell Green and Lower Sydenham. The Pool River is adjacent to the site at its eastern edge, and ~~-~~development will enable measures to enhance the environmental quality and amenity value of the river, ~~,~~ including by improving public access to it via Waterlink Way.

Development requirements

1. Landowners must work in partnership and ~~Development must be delivered~~ in accordance with a master plan for the Bell Green and Lower Sydenham area including a site masterplan, to ensure the appropriate co-location, phasing and balance of uses across the site, in lin with DM3 (Masterplans and comprehensive development).
2. The site must be fully re-integrated with the surrounding street network to improve access and permeability in the local area, with enhanced walking and cycle connections between public spaces and the site's surrounding neighbourhoods. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors.
3. Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy, including enhanced public access to Waterlink Way.
4. Safeguard land to support delivery of strategic transport infrastructure, including where required for the Bakerloo line extension~~.~~ and consider options for the provision of a new railway station across the Bell Green Masterplan area, in partnership with TFL and Network Rail.
5. Development proposals must protect and seek to enhance green infrastructure, including SINC, green corridor, Metropolitan Open Land and the Pool River, taking into account the River Corridor Improvement Plan SPD.

Development guidelines

1. Development should deliver a more cohesive and rational road network and street pattern, in coordination with other site allocations. There is an opportunity to open up new east-west and north-south walking and cycle links, to create a legible and more permeable network of routes that connect to the surrounding neighbourhood areas.
2. ~~Development should deliver improved linkages and public access to Waterlink Way that runs along the Pool River.~~Public access through and from the site to the nearby Waterlink Way and SINC should be integral to the site's layout and design.
3. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers

Commented [SA525]: Amended for clarity and to aid policy implementation

Commented [SA526]: Respond to consultation – request to refer to a new railway station

Commented [SA527]: Amended for clarity and to aid policy implementation

Commented [SA528]: Amended for clarity, to encourage access to the SINC and Waterlink Way

where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network. New connections into trunk sewers will not be allowed.

4. To achieve the optimal capacity of the site, development proposals should take into account future public transport accessibility levels, as associated with the Bakerloo line extension.

~~4.~~5. Applicants should consider increasing bus services through the site, in partnership with TFL.

6. Development should be designed to provide an appropriate transition in bulk, scale and massing from the site to its surrounds. Neighbourhoods to the immediate north and east of the site are predominantly suburban and residential in character.

~~5.~~7. The site is identified as a suitable location for tall buildings, in line with Policy QD4 (Building heights).

~~6.~~8. Parking provision should reflect future improvements to public transport accessibility levels in the area.

~~7.~~9. Development should support the Area of Special Local Character by conserving and enhancing the characteristics that contribute to the area's significance.

10. Development proposals should investigate opportunities to deliver a decentralised energy network.

11. Applicants should work in partnership with Sothern Gas Networks and Fulcrum Pipelines Ltd and engage with them early at pre-application stage, to investigate existing gas infrastructure and the need for gas supply within the new development.

Commented [SA529]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

Commented [SA530]: Respond to consultation – request to reference bus services

Commented [SA531]: Amended for clarity and to aid policy implementation

Commented [SA532]: Respond to consultation – request to reference partnership working with utility providers

3 Sainsbury's Bell Green

Site address:	Sainsbury's, Southend Lane, London, SE26 4PU			
Site details:	Site size (ha): 5.42, Setting: Urban, PTAL: In 2015: 2-3, In 2021: 2-3, In 2031: 2-3, Ownership: Private, Current use: Out of centre retail, Car park			
How site was identified:	Lewisham Call for Sites (2015) and London SHLAA (2017)			
Planning designations and site considerations:	~~-~~Regeneration Node, Appropriate Location for Tall Buildings, Strategic Area of Regeneration, adjacent ~~Public Open Space~~to Strategic Open Space, ~~South-east London Green Chain~~ Area, Air Quality Management Area , adjacent Metropolitan Open Land, adjacent Waterlink Way, Flood Zones 1 and 2, Critical Drainage Area			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 Yes	Beyond 15 years ~~Yes~~
Indicative development capacity:	Net residential units: ~~511-1,251~~550 - 1,347		Non-residential floorspace: Employment ~~5,501~~2,751 Main town centre 11,003	

Commented [SA533]: Factual update on designations

Commented [SA534]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

The higher residential units figure relates to a higher growth scenario associated with the delivery of the BLE and Opportunity Area status

Site allocation

Comprehensive mixed-use redevelopment of the existing out-of-centre supermarket with compatible residential, commercial, main town centre and community uses. Reconfiguration of existing buildings and spaces to facilitate a new layout with improved routes, both into and through the site. Public realm and environmental enhancements, including new walking and cycle routes, public open space and river restoration.

Opportunities

The site comprises an out-of-centre supermarket and car parking. Redevelopment and site intensification, along with the introduction of a wider range of uses, can provide a more optimal use of land and support local area regeneration. There is scope to facilitate transformational public realm and environmental enhancements in coordination with other sites, and in accordance with an area framework for Bell Green and Lower Sydenham. The Pool River is adjacent to the site at its eastern edge, and development will enable measures to enhance the environmental quality and amenity value of the river, including by improving public access to it via Waterlink Way.

Development requirements

1. Landowners must work in partnership and~~Development must be delivered~~ in accordance with a master plan for the Bell Green and Lower Sydenham area, including a site masterplan, to ensure the appropriate co-location, phasing and balance of uses across the site, in line with Policy DM3 (Masterplan and comprehensive development)~~.~~
2. The site must be fully re-integrated with the surrounding street network to improve access and permeability in the local area, with en~~a~~hanced walking and cycle connections between public spaces and the site's surrounding neighbourhoods. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors.
3. Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy, including enhanced public access to Waterlink Way.
4. Safeguard land to support delivery of strategic transport infrastructure, including where required for the Bakerloo line extension and consider options for the provision of a new railway station across the Bell Green Masterplan area, in partnership with TFL and Network Rail.
5. Development proposals must protect and seek to enhance green infrastructure, including SINC, green corridor, Metropolitan Open Land and the Pool River, taking into account the River Corridor Improvement Plan SPD.

Commented [SA535]: Amended for clarity and to aid policy implementation

Commented [SA536]: Respond to consultation – request to refer to a new railway station

Commented [SA537]: Amended for clarity and to aid policy implementation

Development guidelines

1. Development should deliver a more cohesive and rational road network and street pattern, in coordination with other site allocations. There is an opportunity to open up new east-west and north-south walking and cycle links, to create a legible and more permeable network of routes that connect to the surrounding neighbourhood area. Proposals will be expected to investigate opportunities to reconfigure or remove the gyratory as part of an area-wide strategy.

2. High quality public realm along Southend Lane, with generous setbacks and tree planting, should be provided to create a buffer between new buildings and public spaces.

3. ~~Development should deliver improved linkages and public access to Waterlink Way that runs along the Pool River.~~Public access through and from the site to the nearby Waterlink Way and SINC should- be integral to the site's layout and design.

4. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network. New connections into trunk sewers will not be allowed.

5. To achieve the optimal capacity of the site development proposals should take into account future public transport accessibility levels, as associated with the Bakerloo line extension.

6. Applicants should consider increasing bus services through the site, in partnership with TFL.

7. Development should be designed to provide an appropriate transition in bulk, scale and massing from the site to the surrounding area. Neighbourhoods to the immediate east and south of the site are predominantly suburban and residential in character.

~~3.~~8. The site is identified as a suitable location for tall buildings, in line with Policy QD4 (Building heights).

~~4.~~9. Parking provision should reflect future improvements to public transport accessibility levels in the area.

~~5.~~10. Development should support the Area of Special Local Character by conserving and enhancing the characteristics that contribute to the area's significance.

11. Development proposals should investigate opportunities to deliver a decentralised energy network.

Commented [SA538]: Amended for clarity, to encourage access to the SINC and Waterlink Way

Commented [SA539]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

Commented [SA540]: Respond to consultation – request to reference bus services

Commented [SA541]: Amended for clarity and to aid policy implementation

4 Stanton Square Locally Significant Industrial Site

Site address:	Stanton Way, London, SE26 5SP			
Site details:	Site size (ha): 0.97, Setting: Urban, PTAL: In 2015: 3, In 2021: 3, In 2031: 3, Ownership: Private, Current use: Industrial and commercial			
How site was identified:	Site Allocations Local Plan (2013), London SHLAA (2017) and Lewisham Call for Sites (2018) for part of site			
Planning designations and site considerations:	Regeneration Node, Appropriate Location for Tall Buildings, Locally Significant Industrial Site, Archaeological Priority Area, Strategic Area of Regeneration, Air Quality Management Area, Flood Zone 1, Critical Drainage Area			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 Yes	Beyond 15 years ~~Yes~~
Indicative development capacity:	Net residential units: 94-231		Gross non-residential floorspace: Employment 3,249 Main town centre 0	

Commented [SA542]: Factual update on designations

Commented [SA543]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

The higher residential units figure relates to a higher growth scenario associated with the delivery of the BLE and Opportunity Area status

Site allocation

Comprehensive employment led redevelopment. Co-location of compatible commercial and residential uses. Public realm and environmental enhancements.

Opportunities

The site comprises the Stanton Square Locally Significant Industrial Site. Redevelopment and site intensification, along with the co-location of commercial and other uses, can provide a more optimal use of land and support local area regeneration. There is scope to facilitate transformational public realm and environmental enhancements around the gyratory in coordination with other strategic sites.

Development requirements

1. Landowners must work in partnership and d~~D~~evelopment must be delivered in accordance with a master plan for the Bell Green and Lower Sydenham area including a site masterplan, to ensure the appropriate co-location, phasing and balance of employment and other uses across the site, in line with Policy DM3 (Masterplans and comprehensive development).
2. Development must not result in a net loss of industrial capacity, or compromise the function~~al integrity~~ of the employment location, in line with Policy ~~EC 5~~EC6 (Locally Significant Industrial Sites).
3. Delivery of new and improved public realm, in accordance with a site-wide public realm strategy, with particular attention given to the site's relationship with Stanton Way and Southend Lane.
4. Safeguard land to support delivery of strategic transport infrastructure, including where required for the Bakerloo line extension.

Development guidelines

1. Development should better integrate the site with the surrounding street network, addressing the island nature of the site and opportunities to reconfigure or remove the gyratory as part of an area-wide strategy, and in coordination with other site allocations. Proposals should enhance walking ~~-~~and cycle routes, particularly along and across Southend Lane.
2. Non-employment uses, including residential uses, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses.
3. To achieve the optimal capacity of the site, development proposals should take into account future public transport accessibility levels, as associated with the Bakerloo line extension.
4. Development should respond positively to the amenity of the primary school, located on the opposite side of Stanton Way.
5. The retention and incorporation of the well-preserved 20th Century art deco building should be considered as part of the overall design. Consideration should also be given to the well-preserved set of Victorian buildings, the architectural salvage building, and the Bell public house, to ensure that the design of the site contributes to the character of the wider area.

Commented [SA544]: Amended for clarity and to aid policy implementation and
Respond to consultation – landowner request to reference phasing and multiple ownership

Commented [SA545]: Factual update – to reflect new policy numbers in Regulation 19 plan

6. Development should be designed to provide an appropriate transition in bulk, scale and massing from the site to the surrounding area.

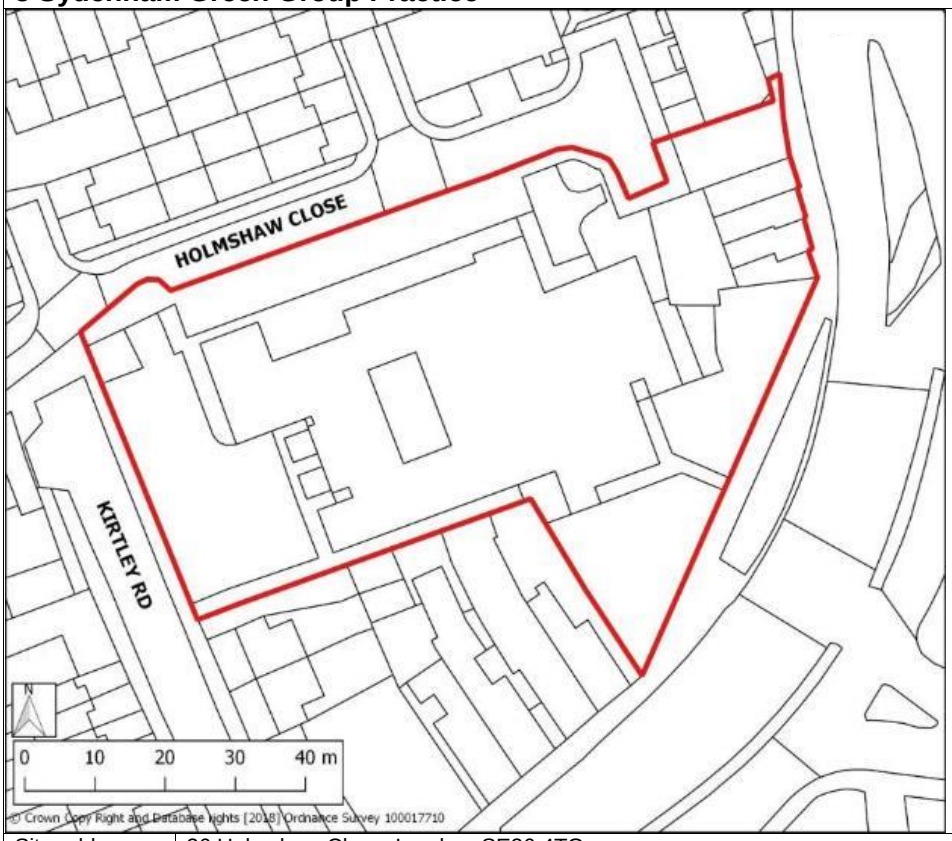
7. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. New connections into trunk sewers will not be allowed.

~~5.~~8. Development proposals should investigate opportunities to deliver a decentralised energy network.

Commented [SA546]: Amended for clarity, to ensure the development responds positively to the surrounding area

Commented [SA547]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

5 Sydenham Green Group Practice



Site address:	26 Holmshaw Close, London, SE26 4TG			
Site details:	Site size (ha): 0.49, Setting: Urban, PTAL: In 2015: 2-3, In 2021: 2-3, In 2031: 2-3, Ownership: Mixed, public and private, Current use: GP surgery			
How site was identified:	Strategic Planning Team (2019) and landowner engagement (2019)			
Planning designations and site considerations:	Archaeological Priority Area, Strategic Area of Regeneration, Air Quality Management Area, Flood Zone 1, Critical Drainage Area			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 Yes	Beyond 15 years ~~Yes~~
Indicative development capacity:	Net residential units: ~~48-117~~ 36-87		Non-residential floorspace: Employment 0 Main town centre ~~1,641~~ 2,487	

Commented [SA548]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

The higher residential units figure relates to a higher growth scenario associated with the delivery of the BLE and Opportunity Area status

Site allocation

Mixed-use redevelopment with residential and community uses, including re-provision of the existing health care facility.

Opportunities

The site is currently occupied by a health care facility. Redevelopment and site intensification, along with the introduction of a wider range of uses, can provide a more optimal use of land and support local area regeneration.

Development requirements

1. Development must be delivered in accordance with a master plan for the Bell Green and Lower Sydenham area.
2. Appropriate re-provision of the existing health care facility, in line with Policy CI 1 (Safeguarding and securing community infrastructure).
3. Positive frontages and improved public realm along Bell Green ~~Lane~~, Holmshaw Close ~~and~~ Kirtley Road and Sydenham Road.

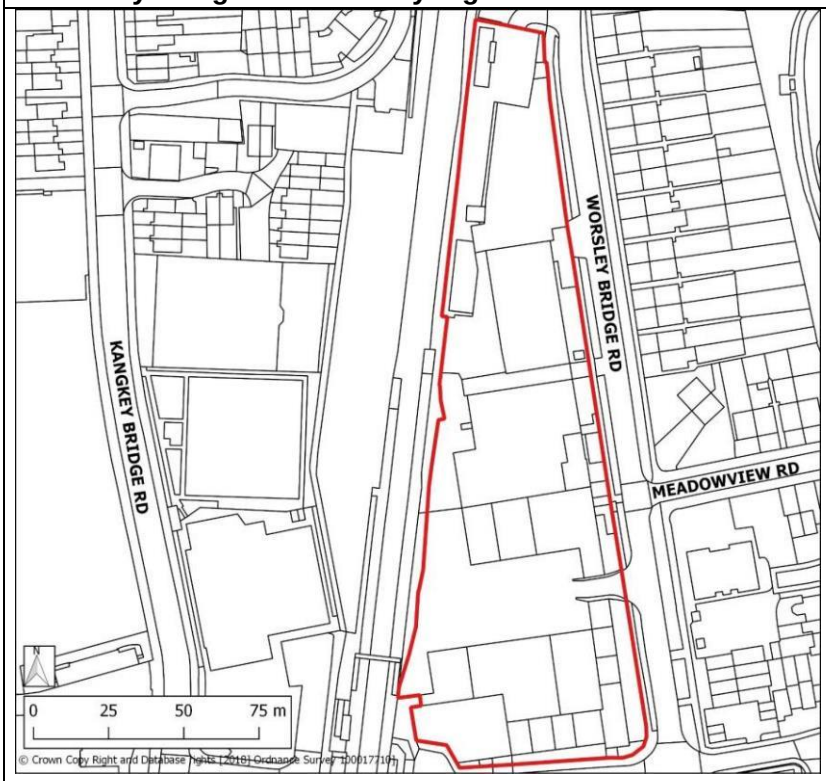
Development guidelines

1. Development should respond positively to the character and amenity of the residential properties surrounding the site.
2. Development should support the Area of Special Local Character by conserving and enhancing the characteristics that contribute to the area's significance.~~.~~
3. Consideration should be given to the introduction of a new walking route connecting Kirtley Road and Bell Green ~~Lane~~ and Sydenham Road.
4. Development should be designed to provide an appropriate transition in bulk, scale and massing from the site to the surrounding area.
5. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. New connections into trunk sewers will not be allowed.

Commented [SA549]: Amended for clarity, to ensure the development responds positively to the surrounding area

Commented [SA550]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

6 Worsley Bridge Road Locally Significant Industrial Site



Site address:	Kangley Bridge Rd, Lower Sydenham, London SE26 5AQ, Bellingham			
Site details:	Site size (ha): 1.26, Setting: Urban, PTAL: In 2015: 2-3, In 2021: 2-3, In 2031: 2-3, Ownership: Private, Current use: Industrial, Commercial, Residential, Vacant land, Car park			
How site was identified:	Site Allocations Local Plan (2013) and London SHLAA (2017)			
Planning designations and site considerations:	Regeneration Node, Appropriate Location for Tall Buildings, adjacent to Strategic Open, adjacent to Site of Importance for Nature Conservation, - Locally Significant Industrial Site, Strategic Area of Regeneration, Flood Zones 1 and 2, Critical Drainage Area			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 Yes	Beyond 15 years ~~Yes~~
Indicative development capacity:	Net residential units: ~~122-300~~ 113-179		Gross non-residential floorspace: Employment ~~4,220~~ 11,907 Main town centre 0	

Commented [SA551]: Factual update on designations

Commented [SA552]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

The higher residential units figure relates to a higher growth scenario associated with the delivery of the BLE and Opportunity Area status

Site allocation

Comprehensive employment led redevelopment. Co-location of compatible commercial and residential uses.

Opportunities

The site comprises the Worsley Bridge Road Locally Significant Industrial Site. There are a mix of commercial and industrial uses, with a number of automotive trades at Broomsleigh Business Park. The age and quality of buildings varies across the site. Kelvin House, a former office block, has been converted to housing through the prior approval process. Redevelopment and site intensification, along with the co-location of commercial and other uses, can provide a more optimal use of land and support local area regeneration. There is scope to facilitate transformational public realm and environmental enhancements around Lower Sydenham station, in coordination with other sites, and in accordance with an area framework for Bell Green and Lower Sydenham.

Development requirements

1. Development must be delivered in accordance with a master plan for the Bell Green and Lower Sydenham area including a site masterplan, to ensure the appropriate co-location, phasing and balance of employment and other uses across the site, in line with Policy DM3 (Masterplans ad comprehensive development).
2. Development must not result in a net loss of industrial capacity, or compromise the functional integrity of the employment location, in line with Policy EC 5EC6 (Locally Significant Industrial Sites).
3. Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including enhancements to the Lower Sydenham station approach and to facilitate the delivery of a cycleways running from Lower Sydenham to Bromley.
4. Safeguard land to support delivery of strategic transport infrastructure, including where required for the Bakerloo Line extension.
5. Positive frontages along Worsley Bridge Road.
6. Development proposals must protect and seek to enhance green infrastructure, including urban green space, SINC land, and green corridor.

Development guidelines

1. Non-employment uses, including residential uses, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses.
2. To achieve the optimal capacity of the site development proposals should take into account future public transport accessibility levels, as associated with the Bakerloo line extension.
3. Consideration should be given to the development options for Kelvin House in order to deliver higher quality residential accommodation as part of a coordinated and masterplanned approach.
4. Proposals should investigate options to improve walking and cycle connections including to the nearby Waterlink Way and SINC. Development should not result in a reduction in exiting footway and carriageway space.

Commented [SA553]: Amended for clarity and to aid policy implementation

Commented [SA554]: Factual update – to reflect new policy numbers in Regulation 19 plan

Commented [SA555]: Respond to consultation – request to make reference to a specific cycleway

Commented [SA556]: Respond to consultation – request to make reference to Waterlink Way, SINC and no reduction in footway and carriageway.

~~4.~~5. Development proposals should address the station approach as a key element of the public realm strategy.

6. Transport for London and Network Rail should be consulted on development and design options.

7. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Surface water sewers that drain to the River Pool are preferable.

Commented [SA557]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

7 Lidl, Southend Lane

Site address:	235 Southend Lane, SE6 3QH, Bellingham			
Site details:	Site size (ha): 0.43, Setting: Urban, PTAL: In 2015: 1a, In 2021: 1a, In 2031: 1a, Ownership: Private, Current use: Out of centre retail, Car park			
How site was identified:	London SHLAA (2017)			
Planning designations and site considerations:	Growth Corridor, Archaeological Priority Area, Strategic Area of Regeneration, Air Quality Management Area, Flood Zone 1, Critical Drainage Area			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 Yes	Beyond 15 years ~~Yes~~
Indicative development capacity:	Net residential units: ~~23~~ 17		Gross non-residential floorspace: Employment 0 Main town centre ~~795~~ 1,204	

Commented [SA558]: Factual update on designations

Commented [SA559]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

Site allocation

Mixed-use redevelopment with residential and main town centre uses.

Opportunities

The site comprises an out-of-centre retail building with car parking. Redevelopment and site intensification, along with the introduction of residential uses, will provide a more optimal use of land and buildings that complement the character of the surrounding properties. Development will also enable public realm enhancements to support movement by walking and cycling along Southend Lane.

Development requirements

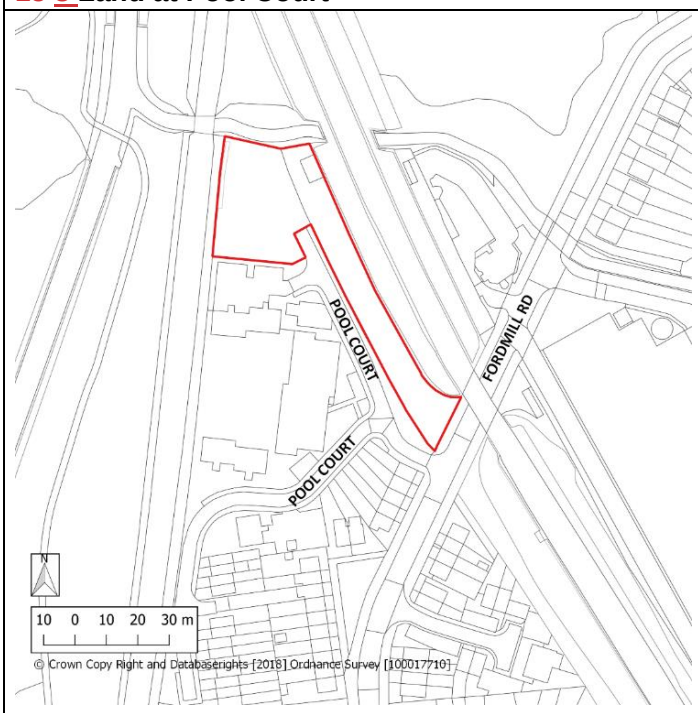
1. Positive frontage along Southend Lane.
2. The development design must create a positive relationship with the adjoining and neighbouring properties, particularly the residential properties around Maroons Way and Meadowview Road.
3. Delivery of new and improved public realm, in accordance with a site-wide public realm strategy.

Development guidelines

1. There is an opportunity to reintroduce a new building frontage, aligned along Southend Lane.
2. Consideration should be given to the integration of a buffer zone along the site's southern boundary to protect and enhance the amenity of properties on and around Maroons Way and Meadowview Road.
3. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan.
4. Development should support the Area of Special Local Character by conserving and enhancing the characteristics that contribute to the area's significance.

Commented [SA560]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~15~~ 8 Land at Pool Court



Site address:	Land at Pool Court, Pool Court, SE6 3JQ
Site details:	**Site size (ha):** 0.30 **Setting:** Central **PTAL:** In 2015: 2, In 2021: 2, In 2031: 2, **Ownership:** Public Ownership – part LBL and part Network Rail **Current use:** Scaffolding site and Green pace
How site was identified:	LBL stepped approach to identifying a gypsy and traveller site.
Planning designations and site considerations:	Strategic Area of Regeneration, Area of Special Local Character, Archaeological Priority Area, Critical Drainage Area, Flood Zone 2, Site of Importance for Nature Conservation, Adjacent to Strategic Open Space.
Planning Status:	~~None~~Pre-application

Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15	Beyond 15 years
	Yes			

Indicative development capacity:	Net residential units:	Gross non-residential floorspace:
	6	Employment 0 Main town centre 0

Commented [SA561]: Factual update on designations

Commented [SA562]: Factual Update – on the progress made in redeveloping the site.

Commented [SA563]: Capacity remains the same as Regulation 18 plan

Site allocation

Development for residential use (gypsy and traveller accommodation).

Opportunities

The site will contribute to addressing identified need arising in the Borough for gypsy and traveller accommodation.

Development requirements

1. Residential uses will be restricted to provision required for gypsy and traveller accommodation, where there is an identified need for such accommodation arising in the borough.

2. Development proposals must protect and seek to enhance green infrastructure and biodiversity, including the SINC.

3. Development must be designed to mitigate against flood risk, working in partnership with the Environment Agency.

~~2.~~4. The design of development must suitably address public health and safety, including the safe functioning of the railway.

Development guidelines

1. Development proposals will be considered having regard to Policy ~~HO11~~ HO10 (Gypsy and traveller accommodation).

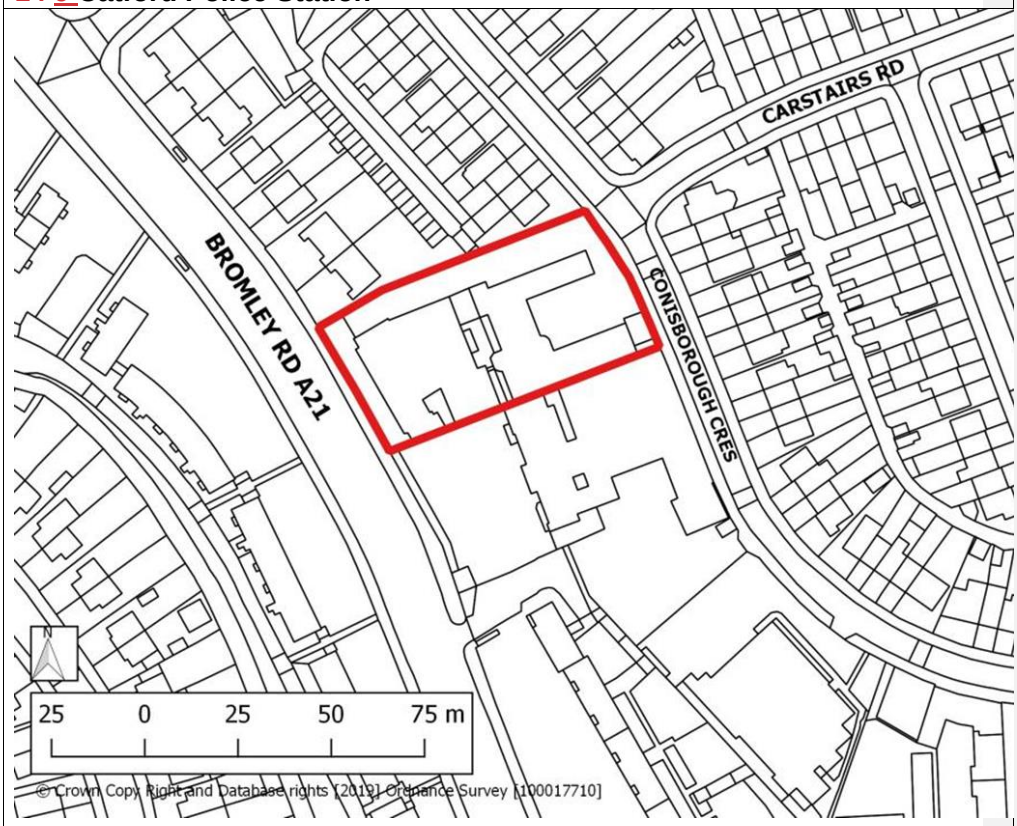
2. Applicants should consult with Network Rail and Transport for London on design and development options.

Commented [SA564]: Respond to consultation – request to refer to biodviersity.

Commented [SA565]: Respond to consultation – Environment Agency request to provide text relating to flood risk

Commented [SA566]: Factual update – to reflect new policy numbers in Regulation 19 plan

~~14~~ 9 Catford Police Station



Site address:	333 Bromley Rd, London SE6 2RJ			
Site details:	Site size (ha): 0.32 Setting: Urban, PTAL: In 2015: 3-4, In 2021:3-4, In 2031: 3-4 Ownership: Current use: Police Station			
How site was identified:	Strategic Planning Team (2019) and Landowner engagement (2019)			
Planning designations and site considerations:	Growth Corridor, ~~-~~Archaeological Priority Area, Air Quality Management Area, Flood Zones 1 and 2, Critical Drainage Area, Strategic Area of Regeneration.			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10 Yes	Years 11-15 ~~Yes~~	Beyond 15 years
Indicative development capacity:	Net residential units: ~~39~~ 24		Gross non-residential floorspace: Employment ~~162~~1,072 Main town centre ~~325~~0	

Commented [SA567]: Factual update on designations

Commented [SA568]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

Site allocation

Mixed use redevelopment with compatible residential, commercial, community and main town centre uses.

Opportunities

~~Subject to appropriate re-provision of the Catford police station, t~~The site offers the potential for redevelopment, with the introduction of a wider range of complementary uses. Redevelopment of buildings and spaces to the rear of the existing station can help to enhance local character, along with the site's relationship with the surrounding residential properties.

Development requirements

~~1. Site redevelopment will be subject to appropriate re-provision of the Police Station in line with Policy CI 1 (Safeguarding and securing community infrastructure).~~

~~Retention and refurbishment of Locally Listed Catford Police Station.~~

~~2.~~1. Positive frontages along Bromley Road ~~-~~and Conisborough Crescent.

~~3.~~2. Delivery of new and improved public realm in accordance with a site-wide public realm strategy.

~~4.~~3. Development must be delivered in accordance with the A21 ~~Corridor Improvement SPD~~Development Framework.

Development guidelines

1. Development should respond positively to the proportions and features of terraced homes along Conisborough Crescent along the eastern edge of the site. Visual amenity should be enhanced with green buffers introduced along the street frontage.

~~1.~~2. Development should improve opportunities for walking, cycling and other active travel modes, contributing to the A21 Healthy Streets Corridor.

3. Opportunities should be taken to investigate the viability for the adaptive re-use of the existing buildings which are non-designated heritage assets.

4. Development should respond positively to the adjacent Locally Listed Army Reserves building, Hudson House.

~~2.~~5. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable.

Commented [SA569]: Factual update – to reflect that the site is no longer used as a police station

Commented [SA570]: Factual update – to reflect that the site is no longer used as a police station

Commented [SA571]: Factual update – to reflect that the site is no longer used as a police station

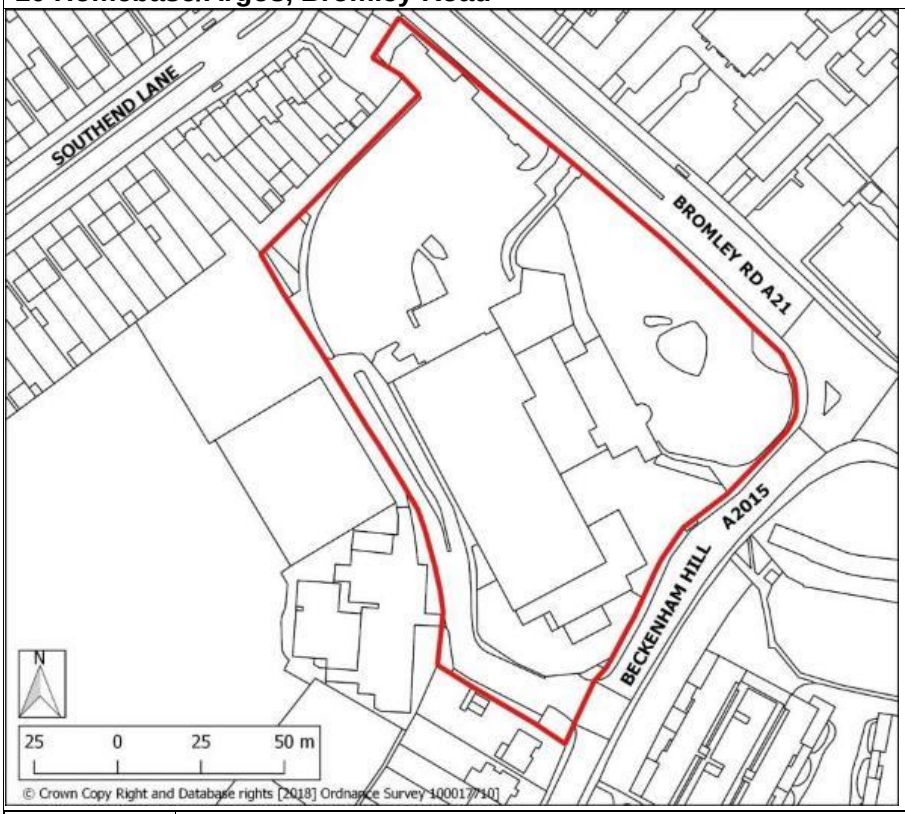
Commented [SA572]: Factual update – to reference correct name of document

Commented [SA573]: Respond to consultation – request to reference A21 Healthy Streets Corridor.

Commented [SA574]: Respond to consultation – request to refer to nearby locally listed heritage asset.

Commented [SA575]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

10 Homebase/Argos, Bromley Road



Site address:	10 Beckenham Hill Road, Catford, London SE6 3NU, Downham			
Site details:	Site size (ha): 1.70, Setting: Urban, PTAL: In 2015: 3, In 2021: 3, In 2031: 3, Ownership: Private, Current use: Out of centre retail, Car park			
How site was identified:	Supplementary Planning Document (Southend Village) (2009), Lewisham Call for Sites (2015) and London SHLAA (2017)			
Planning designations and site considerations:	~~,~~Growth Corridor, ~~-~~Archaeological Priority Area, Site of Importance for Nature Conservation, ~~a~~djacent Urban Green Space Strategic Open Space, Air Quality Management Area, Flood Zones 1 and 2, Critical Drainage Area			
Planning Status:	~~None~~Pre-application			
Timeframe for delivery:	Years 1-5 ~~Yes~~	Years 6-10 Yes	Years 11-15 Yes	Beyond 15 years
Indicative development capacity:	Net residential units: 141		Gross non-residential floorspace: Employment 0 Main town centre 5,694	

Commented [SA576]: Factual update on designations

Commented [SA577]: Factual update – on the progress made in redeveloping the site

Commented [SA578]: Capacities remain the same as Regulation 18 plan

Site allocation

Comprehensive residential-led mixed use redevelopment with compatible main town centre, commercial and community uses. Reconfiguration of existing buildings to facilitate a new layout with new and improved routes, both into and through the site, along with public realm and environmental enhancements.

Opportunities

The site comprises large format out-of-centre retail buildings and associated car parking. Redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land~~.~~. The site benefits from relatively good levels of transport accessibility, and being situated on the A21 corridor offers scope for public realm improvements to support movement by walking and cycling. Development will also help to enhance the amenity and character of the historic Southend Village, which is situated opposite the site.

Development requirements

1. Development proposals must be delivered in accordance with the A21 ~~Corridor Intensification and~~ Development ~~SPD~~ Framework and consider co-location, phasing and balance of uses across the site, in line with Policy DM3 (masterplans and comprehensive development)~~.~~ Longer term redevelopment of the site should not prejudice the continued operation of the site's retail uses in the short to medium term.
2. Positive frontages along Bromley Road and Beckenham Hill.
3. The site must be fully re-integrated with the surrounding street network to improve access and permeability in the local area, with enhanced walking and cycle connections between public spaces, the site's surrounding neighbourhoods and Southend Village. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors.
4. Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy, including retention of the pond.
5. Development proposals must protect and seek to enhance green infrastructure, including SINC, urban green space and public open space.

Development guidelines

1. Re-provision of the existing retail use is acceptable, providing other objectives for redeveloping the site (such as improved layout, walking, cycling, landscaping and alternative use of the surface car park) can be achieved.
2. Development should be designed to enhance walking and cycle movement, with improved permeability through the site, in particular from Bromley Road through to Beckenham Hill Road and from Bromley Road through to the sports ground to the west of the site.

~~1.~~3. Development should improve opportunities for walking, cycling and other active travel modes, contributing to the A21 Healthy Streets Corridor.

~~2.~~4. Landscaping design should optimise linkages to and opportunities associated with the many green features within and surrounding the site. The pond (designated SINC) in the eastern corner of the site, should form a key feature of the development and its biodiversity value should be enhanced. Proposals will also be expected to retain the existing mature tree coverage, whilst improving the amenity of the remainder of the site.

Commented [SA579]: Factual update – to reference correct name of document

Commented [SA580]: Respond to consultation – landowner request that retail should be retained in advance of the site's redevelopment

Commented [SA581]: Respond to consultation – request to acknowledge the existing retail use

Commented [SA582]: Respond to consultation – request to reference A21 Healthy Streets Corridor

~~3.~~5. Development should respond positively 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.

~~4.~~6. Development should create a positive relationship with the sports ground, which adjoins the site at its western boundary.

7. Development proposals should make a more optimal use of the land by reviewing options for the existing car park.

8. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network. New connections into trunk sewers will not be allowed.

Commented [SA583]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~12~~ 11 Beadles Garage

Site address:	Beadles Volkswagen, Bromley, Bromley Hill BR1 4JS			
Site details:	Site size (ha): 0.33, Setting: Urban, PTAL: In 2015: 2, In 2021: 2, In 2031: 2, Ownership: Private, Current use: Car showroom / MOT			
How site was identified:	London SHLAA (2017)			
Planning designations and site considerations:	Adjacent Site of Importance for Nature Conservation, adjacent Public Open Space, Strategic Area of Regeneration, Flood Zone 1, Critical Drainage Area			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15	Beyond 15 years Yes
Indicative development capacity:	Net residential units: ~~22~~ 25		Gross non-residential floorspace: Employment ~~92~~610 Main town centre ~~185~~0	

Commented [SA584]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

Site allocation

Mixed-use redevelopment with compatible residential and commercial or ancillary main town centre uses.

Opportunities

This corner site, which is currently in use as a car showroom and MOT, is bounded by Bromley Hill and Avondale Road. Redevelopment and site intensification can make a more optimal use of land along with enabling public realm enhancements along the A21 corridor.

Development requirements

1. Positive frontages and public realm enhancements along Bromley Hill and Avondale Road with active ground floor frontages.
2. Development must be delivered in accordance with the A21 ~~Corridor Intensification and~~ Development ~~SPD~~Framework.
3. Delivery of new and improved public realm, in accordance with a site-wide public realm strategy.
4. Development proposals must protect and seek to enhance green infrastructure, including an adjacent cemetery, designated as SINC land and public open space.

Development guidelines

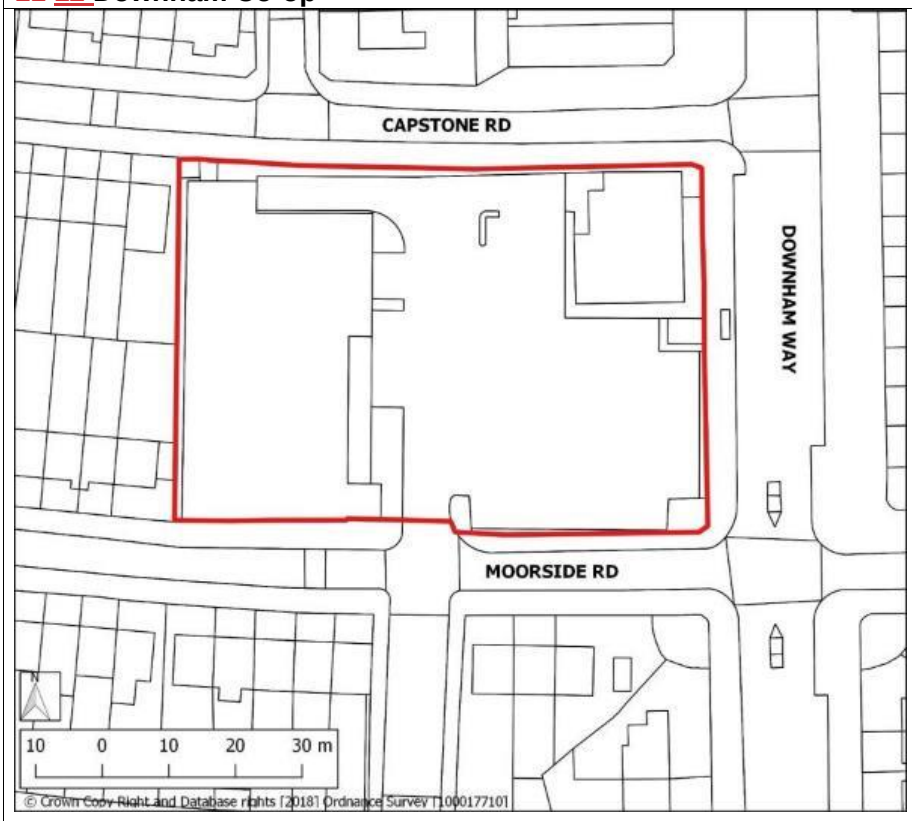
1. Development should create positive frontages along Bromley Hill and Avondale Road along with public realm enhancements to strengthen the prevailing urban boulevard characteristic.
2. Development should ~~and~~ improve opportunities for walking, cycling and other active travel modes, contributing to the ~~along the~~ A21 Healthy Streets C~~c~~orridor.~~.~~
3. Consideration should be given to enhancing the relationship between the site and the designated public open space and SINC immediately to the north of the site, whilst respecting its character and context as an historic cemetery with archaeological value.
4. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water and divert existing sewers where applicable.

Commented [SA585]: Factual update – to reflect correct name of document

Commented [SA586]: Respond to consultation – request to refer to A21 Healthy Streets corridor.

Commented [SA587]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~11~~ 12 Downham Co-op



Site address:	431-435 Downham Way, Bromley BR1 5HR			
Site details:	Site size (ha): 0.43, Setting: Suburban, PTAL: In 2015: 3, In 2021: 4, In 2031: 4, Ownership: Private, Current use: Retail, Public house, Car park			
How site was identified:	London SHLAA (2017), and landowner engagement (2019)			
Planning designations and site considerations:	Local Centre, Strategic Area of Regeneration, Flood Zone 1, Critical Drainage Area			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15	Beyond 15 years Yes
Indicative development capacity:	Net residential units: 42		Gross non-residential floorspace: Employment 0 Main town centre 1,440	

Commented [SA588]: Capacities remain the same as Regulation 18 plan

Site allocation

Mixed-use redevelopment with compatible main town centre and residential uses.

Opportunities

This site comprises a single storey retail building with car parking, along with a public house. It is located within Downham Way local centre and surrounded by a mix of residential, retail and community uses. Redevelopment ~~-~~and site intensification, along with the introduction of a wider range of uses, will make a more optimal use of land and help to enhance the vitality and viability of the local centre. Public realm enhancements will also improve access to the Downham Health and Leisure Centre.

Development requirements

1. Positive frontages along Downham Way, Cap~~tt~~sone Road and Moorside Road, with active ground floor frontages on Downham Way.
2. Delivery of new and improved public realm, in accordance with a site-wide public realm strategy.
3. Retention or appropriate re-provision of the public house, in line with Policy EC19 (Public houses).

Development guidelines

1. Development should create positive frontages with public realm enhancements along Capstone Road, Downham way, Moorside Road.
2. The development should respond positively to the Downham Health and Leisure Centre, on the opposite site of Moorside Road, with public realm enhancements to improve access to the facility from Downham Way, particularly by walking and cycling.
3. Development should be designed to protect the amenity of neighbouring properties, including the public house in line with the Agent of Change principle.
4. Development proposals should make a more optimal use of the land by reviewing options for the existing car park.
5. Existing trees along the site boundary should be retained.
6. Applicants should work in partnership with Thames Water and engage with them early to manage surface water and divert existing sewers where applicable.

Commented [SA589]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~8~~ 13 Excalibur Estate

Site address:	Excalibur Estate, Baudwin Road, Whitefoot, SE6
Site details:	Site size (ha): 6.14, Setting: Urban, PTAL: In 2015: 1b, In 2021: 1b, In 2031: 1b, Ownership: Public, Current use: Housing estate
How site was identified:	London SHLAA (2017)
Planning designations and site consideration:	Strategic Area of Regeneration, Flood Zone 1, Critical Drainage Area, adjacent 6 Listed Buildings
Planning Status:	Full application DC/10/075973 granted March 2012. Various subsequent reserved matters and S73 applications granted up till November 2021. Started construction and 57 units have already been completed~~development is partially complete~~.

Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15	Beyond 15 years
	Yes			

Commented [SA590]: Factual update – on the progress made in redeveloping the site

Indicative development capacity: Remaining net units to be delivered:	Net residential units: ~~305~~ 287 230	Gross non-residential floorspace: Employment 0 Main town centre 0

Commented [SA591]: Capacities amended to reflect the planning consents granted for the site

Existing planning consent

DC/10/75973 - The redevelopment of the Excalibur Estate SE6, seeking full planning permission (Phase 1) for 152 residential units, and outline planning permission (Phase 2) for 219 residential units, creating a total of 371 residential together with associated highway infrastructure, soft and hard landscaping including the provision of open space.

DC/17/100865 - Reserved Matters of design (internal layout, external appearance), landscaping, scale and massing (height), resulting in a reduction to 210 residential units for phases 4 and 5.

DC/21/120231 – S73 application for changes to the spine road and three additional residential units in Phase 1c.

Commented [SA592]: Factual update – to reflect the planning consent granted for the site

Site allocation

Housing estate regeneration. Comprehensive redevelopment for residential uses.

Opportunities

The site is a housing estate is located in Bellingham within a predominantly residential area. Estate regeneration will replace 178 existing residential units with 362 new units to provide net ~~new with~~ 184 high quality affordable housing units, alongside public realm enhancements. 57 of the residential units in p~~P~~hases 1a and 1b ~~2 of the consented development are~~ have already been completed. Construction, with an additional three residential units, for phase 1c has started. Phase 2 (previously named Phases 4 and 5) has not yet started construction and is ~~also~~ seeking to accommodate approximately additional 100 residential units above the initial consent.

Commented [SA593]: Respond to consultation – landowner request to provide updates on delivery of site

Development requirements

1. Provision of residential accommodation consistent with the planning consent.
2. Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy.
3. Support conservation objectives for heritage assets including Grade II ~~locally l~~Listed B~~b~~uildings - a row of six locally listed pre-fabricated buildings along Persant Road.
4. Development proposals must protect and seek to enhance green infrastructure, including Urban Green Space and allotment gardens, which run alongside the railway, and adjoin the site's eastern boundary.

Commented [SA594]: Respond to consultation - Historic England request to provide correct reference to designated heritage assets

Development guidelines

1. Connectivity through the site should be improved via a central landscaped spine route, with connecting home zones, and integrating with the existing street pattern and road

network. Car parking should be integrated with soft and hard landscaping to ensure cars are not prominent in the streetscape.

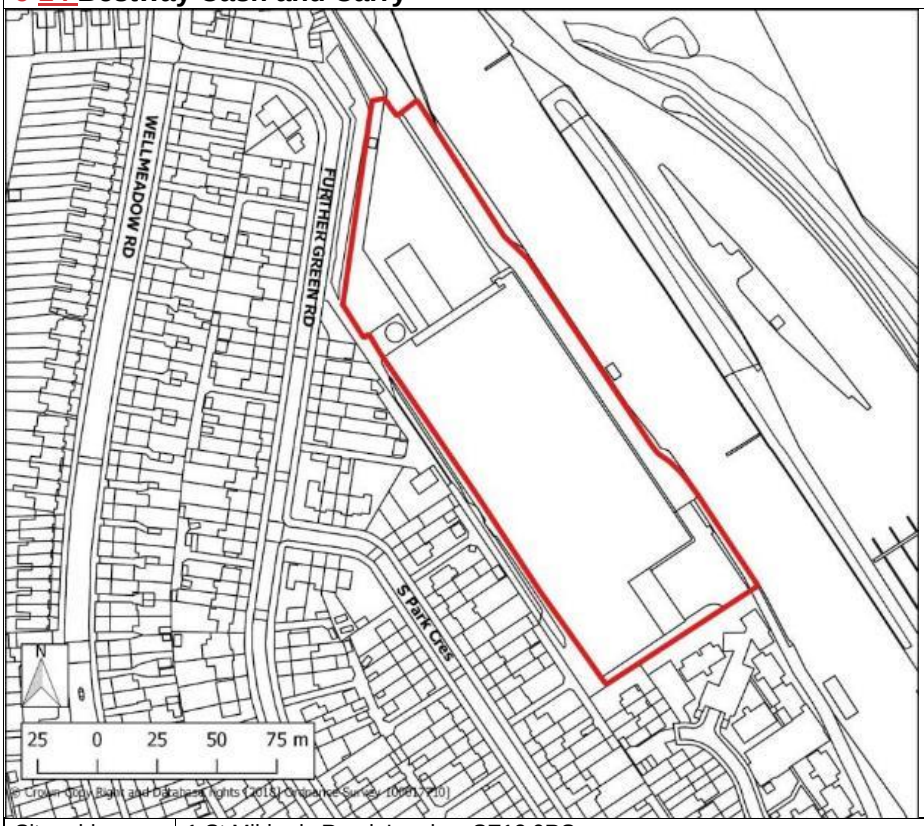
2. The design of development should respond positively to the existing residential properties surrounding the site. A reduced scale should be used in the vicinity of the locally listed buildings adjoining the site's southern boundary.

3. Development should provide a clear pattern of public and private space, with a range of gardens and amenity areas and high quality landscape designed to integrate into the overall scheme. A range of play spaces should be provided for children, including pocket play spaces, local play spaces and youth spaces.

4. Applicants should work in partnership with Thames Water and engage with them early to manage surface water and divert existing sewers where applicable. New connections into the Evelyn Street trunk sewers will not be allowed.

Commented [SA595]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~9~~ 14 Bestway Cash and Carry



Site address:	1 St Mildreds Road, London, SE12 0RS			
Site details:	Site size (ha): 1.70, Setting: Urban, PTAL: In 2015: 1b, In 2021: 1b, In 2031: 1b, Ownership: Private, Current use: Retail warehouse, Car park			
How site was identified:	London SHLAA (2017)			
Planning designations and site considerations:	Air Quality Focus Area, Strategic Area of Regeneration, Flood Zone 1, Critical Drainage Area			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 Yes	Beyond 15 years ~~Yes~~
Indicative development capacity:	Net residential units: 136		Gross non-residential floorspace: Employment 0 Main town centre 0	

Commented [SA596]: Capacities remain the same as Regulation 18 plan

Site allocation

Redevelopment for residential use.

Opportunities

The site comprises a large format retail warehouse on non-designated employment land, which is situated within a predominantly residential area. The nature of the existing use along with the site's low level of public transport accessibility leads to a significant amount of vehicular traffic in the locality. Site redevelopment will introduce residential uses that better complement the neighbouring properties.

Commented [SA597]: Amended for clarity, to emphasise that the site is not on designated employment land

Development requirements

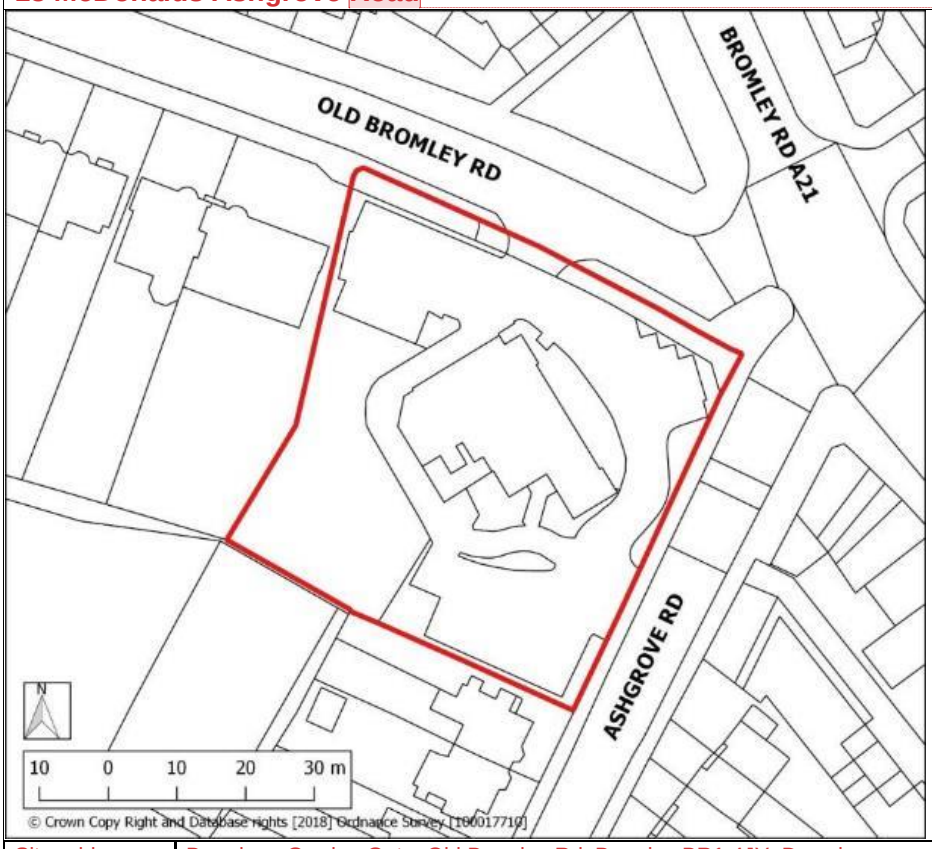
1. Residential-led development with a design that responds positively to the site's suburban location.
2. Development proposals must protect and seek to enhance green infrastructure, including SINC, Urban Green Space, allotment gardens and Metropolitan Open Land.
3. Delivery of new and improved public realm and open space in accordance with a site-wide public realm strategy.

Development guidelines

1. Development should provide an appropriate transition in scale from the railway to the existing residential properties, with the potential for taller elements at the eastern part of the site.
2. Landscaping should be an integral part of the scheme and take into account existing mature trees.
3. Residential units should be designed so as to protecting amenity and minimise noise disturbance from the railway.
4. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan.

Commented [SA598]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

13 McDonalds Ashgrove Road



Site address:	Bromley - Garden Gate, Old Bromley Rd, Bromley BR1 4JY, Downham
Site details:	Site size (ha): 0.32, Setting: Urban, PTAL: In 2015: 2, In 2021: 2, In 2031: 2, Ownership: Private, Current use: Out of centre restaurant
How site was identified:	London SHLAA (2017)
Planning designations and site constraints:	adjacent South London Green Chain Area, adjacent Metropolitan Open Land, Area of Archaeological Priority, Flood Zone 1, Critical Drainage Area
Planning Status:	None
Timeframe for delivery:	2020/21 – 2024/25 | 2025/26 – 2029/30 | 2030/31 – 2034/35 | 2035/36 – 3039/40
Indicative development capacity:	Net residential units: 31 | Gross non-residential floorspace: Employment Main town centre 1,072

Commented [SA599]: Respond to consultation – the site allocation has been removed from the Plan as the landowner has no aspirations to redevelop the site.

~~**Site allocation**~~

~~Mixed use redevelopment with compatible residential and main town centre or commercial uses.~~

~~**Opportunities**~~

~~This corner site lies in a prominent position at the junction of Ashgrove Road, Old Bromley Road and Bromley Hill, and is surrounded by a mix of residential and retail uses. Redevelopment and site intensification, along with the introduction of a wider range of uses, will make a more optimal use of land. Development will also enable public realm enhancements along the A21 corridor. Through a well-degisgned scheme, the existing restaurant can be retained at the ground floor level with residential units integrated above.~~

~~**Development requirements**~~

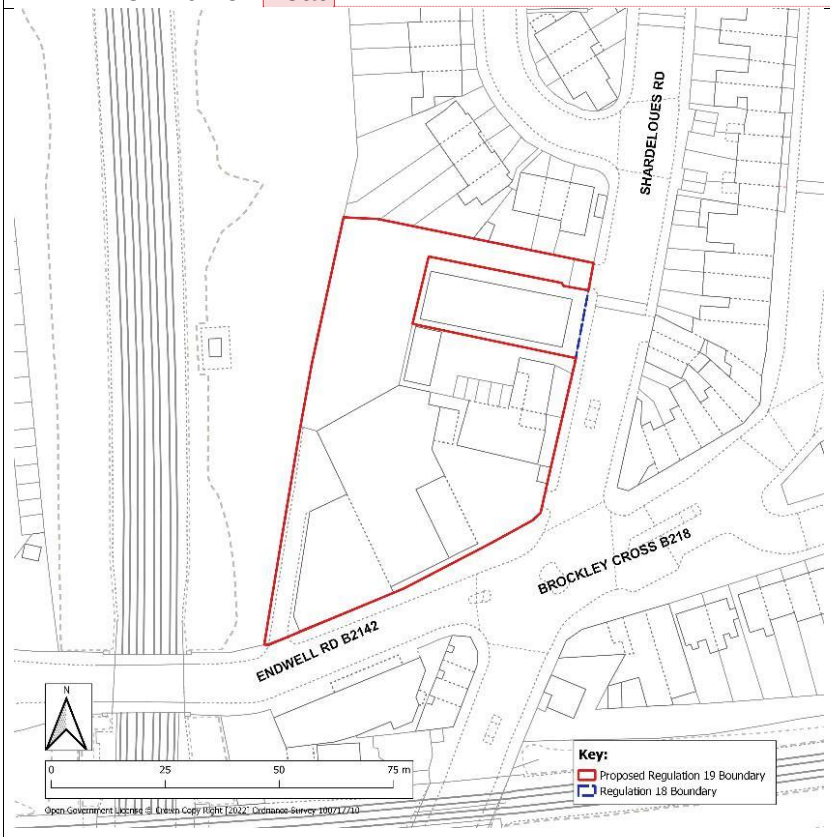
- ~~Positive frontages and public realm enhancements along Bromley Road and Ashgrove Road, with active ground floor frontages.~~
- ~~Development must be delivered in accordance with the A21 Corridor Intensification and Development SPD.~~
- ~~Development proposals must protect and seek to enhance green infrastructure, including the adjacent playing field, designated as Metropolitan Open Land and green corridor.~~

~~**Development guidelines**~~

5. ~~Development should create positive frontages along Old Bromley Road and Ashgrove Road, with new buildings aligned with the existing street pattern, to strengthen the prevailing urban boulevard characteristic and improve opportunities for walking and cycling along the A21 corridor.~~
6. ~~The development design should respond positively to the existing residential properties surrounding the site. There is a potential for taller elements to be sited in the eastern corner of the site, opposite Sandpit Road.~~
7. ~~Proposals should seek to enhance access around and permeability through the site, in particular with direct access through to the playing fields to the west of the site.~~
8. ~~Landscaping should be designed as an integral part of the development, with public realm that enhances the amenity of the site and connects with the existing open amenity space on the corner of Old Bromley Road. The historic trough (street furniture) at junction with Old Bromley Road and Bromley Road is of special interest and should be maintained.~~
9. ~~Development should be designed to retain existing vehicular access onto both Old Bromley Road and Ashgrove Road.~~

West Area

1 111-115 Endwell Road



Site address:	111-115, Endwell Road, SE4 2PE			
Site details:	Site size (ha): ~~0.43~~ 0.38, Setting: Urban, PTAL: In 2015: 4, In 2021: 4, In 2031: 4, Ownership: Private, Current use: Industrial, car services, place of worship			
How site was identified:	Site Allocations Local Plan (2013), London SHLAA (2017) and landowner engagement (2019)			
Planning designations and site considerations:	Adjacent to Conservation Area, adjacent Site of Importance for Nature Conservation, adjacent Local Centre, ~~South East London Green Chain Area~~, Air Quality Management Area , Air Quality Focus Area, Flood Zone 1, Groundwater Source Protection Zone 3, adjacent to Metropolitan Open Land.			
Planning Status:	Full application DC/19/110715 granted in May 2019 (part of the site)			
Timeframe for delivery:	Years 1-5	Years 6-10 Yes	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~65~~ 57		Gross non-residential floorspace: Employment ~~2,235~~ 1,975 Main town centre 0	

Commented [SA600]: Respond to consultation - Boundary amended to exclude church plot

Commented [SA601]: Factual update – site size reduced to reflect that the church plot is no longer located within the site.

Commented [SA602]: Factual update – providing additional details on flood risk

Commented [SA603]: Factual update on designations

Commented [SA604]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

Existing planning consent

DC/19/110715 – Full application for part of the site with d~~D~~emolition of the existing single storey buildings on the site at R L Watson and Son, Shardeloes Road SE4 and construction of a part one/part two storey building to provide an MOT centre facilities.

Site allocation

Employment led mixed-use redevelopment with compatible commercial, community and residential uses.

Opportunities

The southern part of this site is located within Brockley Cross local centre. Redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the vitality and viability of the local centre, including with new and improved workspace. Development ~~-~~will also enable public realm enhancements, including improvements to the station approach.

Development requirements

1. Landowners must work in partnership and ~~Development must be delivered~~ in accordance with a masterplan, to ensure coordination, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development).

~~1.~~2. The maximum viable amount of employment floorspace must be re-provided, in line with Policy ~~EC7~~ EC8 (Non-designated employment sites).

~~Retention or appropriate re-provision of the existing religious facility, in line with Policy CI 1 (Safeguarding and securing community infrastructure).~~

~~2.~~3. Positive frontages with active ground floor frontages on Endwell Road and Shardeloes Road,

~~3.~~4. Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including enhancements to improve legibility, safety and access to the station.

~~4.~~5. Development proposals must protect and seek to enhance green infrastructure, including the SINC and green corridor along the railway embankment.

Development guidelines

1. Non-employment uses, including residential uses, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses.
2. Building heights should respond positively to the site surroundings including the residential buildings along the site's northern and eastern boundaries. Taller elements should be sited on the western side of the site, facing the railway.
3. The wall surrounding the timber yard and the blank, ground level façade along Endwell Road should be removed ~~-~~in order to enhance natural surveillance,~~-~~ and the public realm.
4. Applicants should work in partnership with Thames Water and engage with them early to manage surface water and divert existing sewers where applicable.

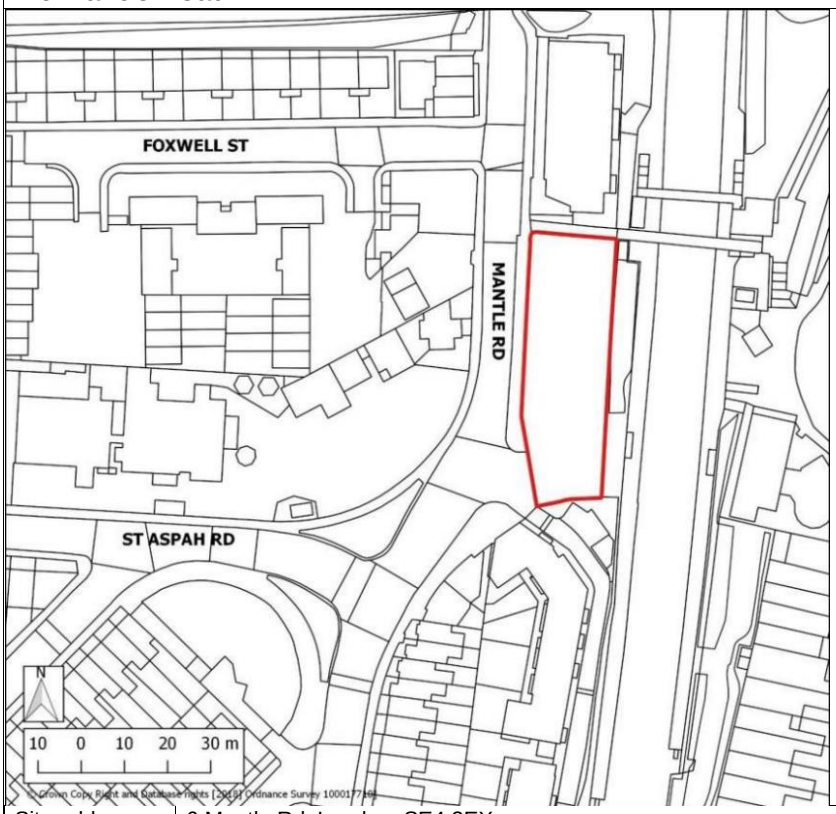
Commented [SA605]: Amended for clarity and to aid policy implementation

Commented [SA606]: Factual update – to reflect new policy numbers in Regulation 19 plan

Commented [SA607]: Respond to consultation - Boundary amended to exclude church plot, so this text is superfluous and has been removed

Commented [SA608]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

2 6 Mantle Road



Site address:	6 Mantle Rd, London, SE4 2EX			
Site details:	Site size (ha): 0.12, Setting: Suburban, PTAL: In 2015: 4-5, In 2021: 4-5, In 2031: 4-5, Ownership: Private, Current use: Industrial			
How site was identified:	Site Allocations Local Plan (2013) and Strategic Planning Team (2019)			
Planning designations and site considerations:	Adjacent Conservation Area, ~~Site of Metropolitan Importance for Nature Conservation~~, adjacent Local Centre, ~~South East London Green Chain~~ Area, Air Quality Management Area~~-~~, Air Quality Focus Area, Flood Zone 1, Groundwater Source Protection Zone 3			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10 Yes	Years 11-15	Beyond 15 years
Indicative development capacity:	Net residential units: ~~17~~ 20		Gross non-residential floorspace: Employment 95 Main town centre 378	

Commented [SA609]: Factual update on designations

Commented [SA610]: Factual update – providing additional details on flood risk

Commented [SA611]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

Site allocation

Mixed-use development with compatible residential~~,~~, commercial and main town centre uses.

Opportunities

The site lies adjacent to Brockley Cross local centre and in proximity to Brockley station. Redevel~~o~~pment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land. Development will also enable the introduction of positive frontages and public realm enhancements along Mantle Road to improve the townscape and station approach.

Development requirements

~~1. The maximum viable amount of employment floorspace must be re-provided, in line with Policy EC7 (Non-designated employment sites).~~

~~2.~~1. Positive frontages with active non-residential ground floor frontages along Mantle Road~~-~~.

~~3.~~2. New and improved public realm ~~-~~in accordance with a site-wide public realm strategy, including to~~-~~ improve legibility and safe access to the station entrance from the western side of the railway.

~~4.~~3. ~~-~~Development proposals must protect and seek to enhance green infrastructure, including the Site of Metropolitan Importance for Nature Conservation ~~SINC~~ and green corridor along the railway embankment.

Development guidelines

1. Consideration should be given to extending the existing parade of shops southwards on Mantle Road.
2. Transport for London and Network Rail should be consulted on development and design options, particularly for the railway station approach and entrance.
3. Building heights should respond positively to the site surroundings including the residential properties along the site's northern boundary, on the opposite side of the railway and the primary school on the opposite side of Mantle Road, which has historic interest. The Brockley Conservation Area is situated on the opposite side of the railway.
4. The wall that establishes a blank façade along Mantle Road and across the footbridge to the station should be removed~~,~~ in order to enhance natural surveillance and the public realm.
5. Applicants should work in partnership with Thames Water and engage with them early to manage surface water and divert existing sewers where applicable.

Commented [SA612]: Amended for clarity and to be more flexible in the site's redevelopment.

Commented [SA613]: Respond to consultation – to make clear that non-residential uses are required on the ground floor

Commented [SA614]: Factual update – to correctly reference that the land outside of the site boundary, that runs along the edge of the railway is a Metropolitan SINC.

Commented [SA615]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

3 Jenner Health Centre

Site address:	Jenner Health Centre, 201-203 Stanstead Rd, London SE23 1HU			
Site details:	Site size (ha): 0.41, Setting: Urban, PTAL: In 2015: 3, In 2021: 3, In 2031: 3, Ownership: Public, Current use: Doctors surgery			
How site was identified:	London SHLAA (2017) and Lewisham Call for Sites (2018)			
Planning designations and site considerations:	Growth Node, Air Quality Management Area, Flood Zone 1, Critical Drainage Area.			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 Yes	Beyond 15 years ~~Yes~~
Indicative development capacity:	Net residential units: ~~40~~ 30		Gross non-residential floorspace: Employment 0 Main town centre ~~1,373~~ 2,081	

Commented [SA616]: Factual update on designations

Commented [SA617]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

Site allocation

Comprehensive mixed use redevelopment of existing health centre with residential and community uses.

Opportunities

The site comprises a health centre and associated car park. It is located on a corner plot, north of Stanstead Road (South Circular) and east of Brockley Rise. Redevelopment and site intensification will provide a more optimal use of the land whilst ensuring appropriate re-provision of health facilities.

Development requirements

1. Appropriate re-provision of the existing health care facility, in line with Policy CI 1 (Safeguarding and securing community infrastructure).
2. Positive frontages along Stanstead Road, Brockley Rise and St Germans Road.
3. Delivery of new and improved public realm, in accordance with a site-wide public realm strategy.

Development guidelines

1. The design of the development should take into account the operational requirements of any community uses, as well as their interface with residential and other uses.
2. The existing surface car park should be removed and redesigned. Parking provision should be the minimum required, taking into account needs of the community use(s) and public transport accessibility levels.
3. Consideration should be given to realigning the street frontage along Stanstead Road, to align with, and respect, the existing buildings on either side of the site.
4. Development should be designed to improve legibility and permeability through the site. This includes new connections north-south through the site, and to Stanstead Road.
4. Development should respond positively to the retained properties on the corner of Brockley Rise and Stanstead Road.
5. Building heights should respond positively to the site surroundings. The central portion of the site may be suitable for taller buildings.
6. Applicants should work in partnership with Thames Water and engage with them early to manage surface water and divert existing sewers where applicable.

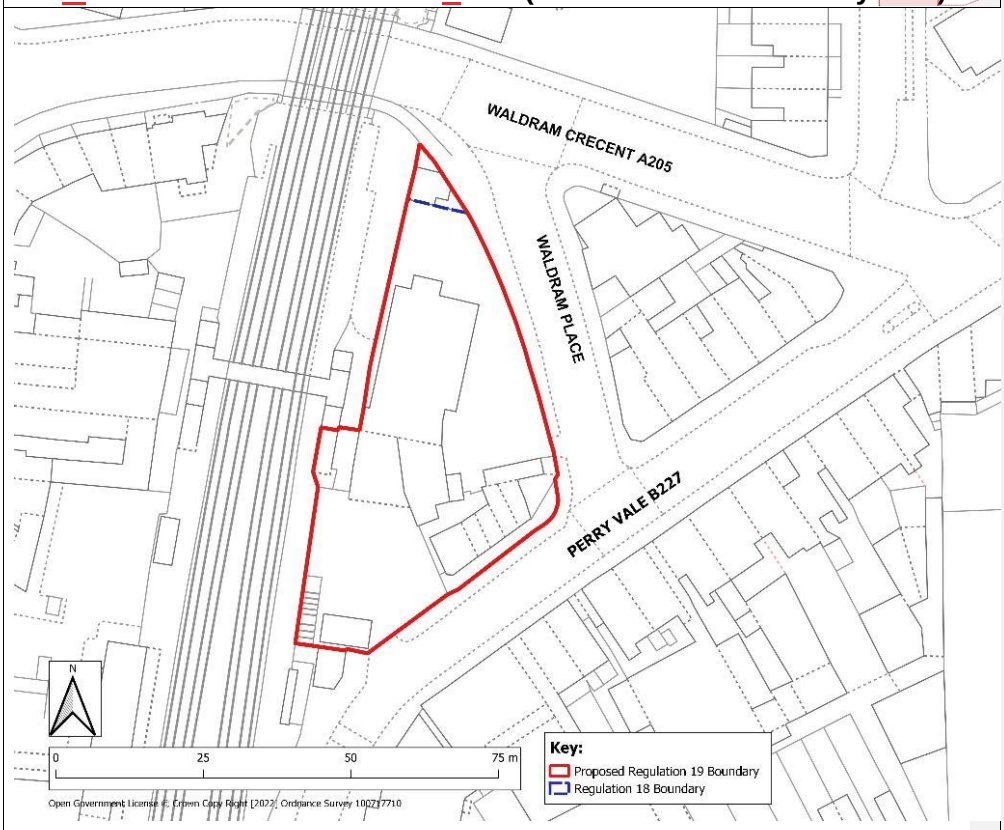
Commented [SA618]: Repetition - removed to ensure clarity in policy implementation - Car parking standards are set out in Policy TR4

Commented [SA619]: Amended for clarity, as additional routes through the site will reduce the development capacity of the site

Commented [SA620]: Respond to consultation – request to reference the corner plot outside of the site boundary

Commented [SA621]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~10~~ 4 Land at Forest Hill Station Eeast (Waldram Place and Perry Vale)



Site address:	East of Forest Hill railway line & west side of Waldram Place/ Perry Vale, SE23 2LD			
Site details:	Site size (ha): 0.21, Setting: Urban, PTAL: In 2015: 5, In 2021: 5, In 2031: 5, Ownership: Private, Current use: Car services, ~~Nursery~~			
How site was identified:	Site Allocations Local Plan (2013), London SHLAA (2017), Lewisham Call for Sites (2018) and landowner engagement (2019)			
Planning designations and site considerations:	Growth Node, Conservation Area, adjacent Site of Importance for Nature Conservation, District Centre, Night-time Economy Hub, Air Quality Management Area, Air Quality Focus Area, Flood Zone 1, Critical Drainage Area			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 Yes	Beyond 15 years
Indicative development capacity:	Net residential units: 41		Gross non-residential floorspace: Employment 191 Main town centre 764	

Commented [SA622]: Respond to consultation – landowner requested an amendment to the site boundary to include 1 Waldram Place.

Commented [SA623]: Factual update on designations

Commented [SA624]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

Site allocation

Comprehensive mixed-use redevelopment with compatible main town centre, commercial and residential uses. Public realm enhancements to Forest Hill station approach.

Opportunities

This non-designated employment site is located near Forest Hill Station, east of the railway line, and within Forest Hill district centre. Redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the vitality and viability of the town centre. Development will also deliver public realm enhancements to improve the station approach and townscape.

Development requirements

1. Landowners must work in partnership and in accordance with a masterplan, to ensure the appropriate co-location, phasing and balance of employment and other uses across the site, in line with Policy DM3 (Masterplans and comprehensive development).

~~1.~~2. The maximum viable amount of employment floorspace must be re-provided, in line with Policy ~~EC7~~ EC8 (Non-designated employment sites).

~~Retention or appropriate re-provision of the nursery, in line with Policy CI 1 (Safeguarding and securing community infrastructure).~~

~~2.~~3. Positive frontages along Waldram Place and Perry Vale, with active ground floor frontages~~.~~

~~3.~~4. New and improved public realm in accordance with a site-wide public realm strategy, including enhancements to the station approach.

~~4.~~5. Development proposals must protect and seek to enhance green infrastructure, including the SINC along the railway.

Development guidelines

1. Development and design options should be considered through early consultation with Transport for London and Network Rail.

2. Generous setbacks should be provided, particularly along Perry Vale, to deliver public realm enhancements and an improved sense of arrival at the station.

~~2.~~3. Development should improve opportunities for walking, cycling and other active travel modes, creating a sense of arrival into the District Centre. Development should not result in a reduction in existing footway or carriageway space and where possible the width of the pavements should be increased. Development should also provide a new pedestrian crossing and should consider improvements to the layout and configuration of Perry Vale from its junction with Waldram Place to the South Circular.

~~3.~~4. For commercial uses, priority should be given to flexible workspace that complements provision in the Forest Hill Cultural Quarter

5. The design of development, including building heights, should respond positively to the setting of the Forest Hill Conservation Area.

~~4.~~6. Applicants should work in partnership with Thames Water and engage with them early to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan.

Commented [SA625]: Amended for clarity and to aid policy implementation

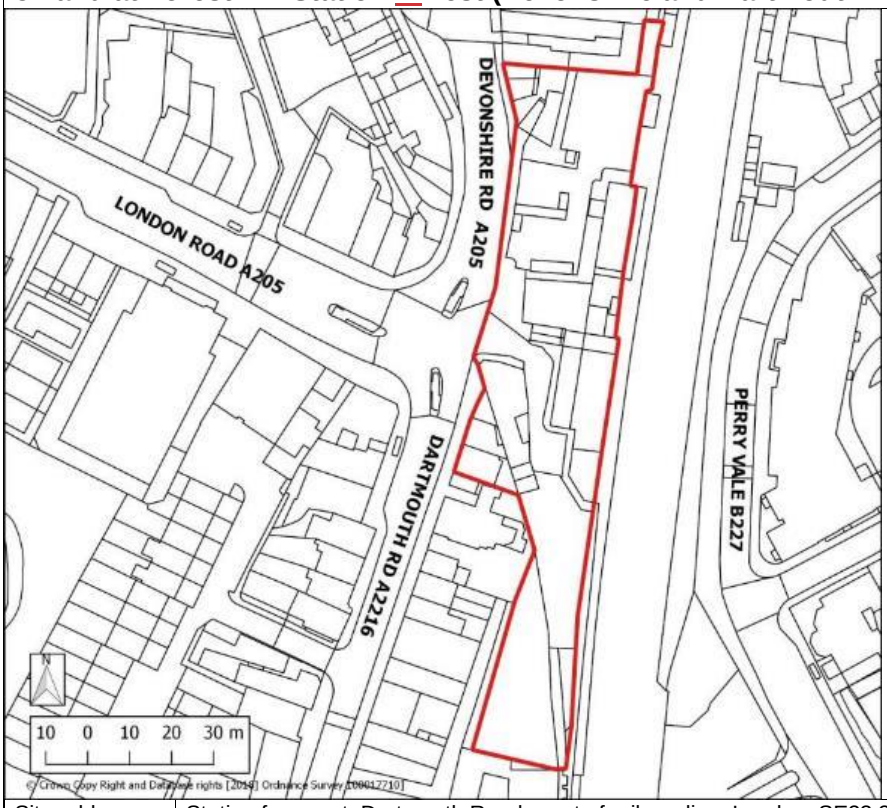
Commented [SA626]: Factual update - to reflect new policy numbers in Regulation 19 plan

Commented [SA627]: Respond to consultation – as the site is not used as a nursery, the landowner has requested that the text related to the nursery is removed.

Commented [SA628]: Respond to consultation – request to enhance walking and cycling surrounding the site and create a sense of arrival in the town centre.

Commented [SA629]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

5 Land at Forest Hill Station Wwest (Devonshire and Dartmouth Roads)



Site address:	Station forecourt, Dartmouth Road, west of railway line, London, SE23 3HB			
Site details:	Site size (ha): 0.44, Setting: Urban, PTAL: In 2015: 5, In 2021: 5, In 2031: 5, Ownership: Private, Current use: Main town centre uses, Retail, Dentist, Industrial, Car services, Car park			
How site was identified:	Site Allocations Local Plan (2013), London SHLAA (2017) and Lewisham Call for Sites (2018)			
Planning designations and site considerations:	Growth Node, Conservation Area, District Centre, Primary Shopping Area, Night-time Economy Hub, Cultural Quarter, Air Quality Management Area, Air Quality Focus Area, Flood Zone 1, Critical Drainage Area, adjacent Locally Listed Building, adjacent to Strategic Open Space			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 Yes	Beyond 15 years
Indicative development capacity:	Net residential units: ~~86~~ 80		Gross non-residential floorspace: Employment ~~400~~ 801 Main town centre 1,602	

Commented [SA630]: Factual update on designations

Commented [SA631]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

Site allocation

Comprehensive mixed-use development with compatible, main town centre, commercial, community and residential uses. Public realm enhancements to improve Forest Hill station approach and forecourt.

Opportunities

The site is located adjacent to Forest Hill Station, west of the railway line and within Forest Hill district centre. Redevelopment and site intensification will provide a more optimal use of land to support the vitality and viability of the town centre. Development will also enable public realm enhancements to improve the ~~the~~ station approach and forecourt.

Development requirements

1. Landowners must work in partnership and in accordance with a masterplan, to ensure the appropriate co-location, phasing and balance of employment and other uses across the site, in line with Policy DM3 (Masterplans and comprehensive development).

~~1.~~2. Positive frontages along Devonshire (A205) and Dartmouth Roads, including active ground floor frontages

~~2.~~3. ~~Retention or a~~Appropriate re-provision of the existing dental surgery, in line with Policy CI 1 (Safeguarding and securing community infrastructure).

~~3.~~4. The maximum viable amount of employment floorspace must be re-provided, in line with Policy ~~EC7~~ EC8 (Non-designated employment sites).

~~4.~~5. Delivery of new and improved public realm, in accordance with a site-wide public realm strategy. This must address legibility, safety and access to the station, including public realm enhancements at the station approach and forecourt.

Development guidelines

10. Development and design options should be considered through early consultation with Transport for London and Network Rail.

11. For commercial uses, priority should be given to flexible workspace that complements provision in the Forest Hill Cultural Quarter.

12. Public realm should form an integral part of the design, taking into account the existing trees and the slope of the ground that provides the opportunity to create different site levels and form public/semi-private/private spaces. Consideration should be given to creating a new public square outside of the station entrance, helping to enhance a sense of arrival, with improved interchange with buses.

13. ~~.~~The design of development, including building heights, should respond positively to the setting of the Forest Hill Conservation Area, and the locally listed building adjacent to the site's western boundary. New buildings should provide a strong relationship with the existing built form on the other side of Waldram Place and Perry Vale.

5. Development should improve opportunities for walking, cycling and other active travel modes, creating a sense of arrival into the District Centre. Development should not result in a reduction in existing footway or carriageway space and where possible the width of the pavements should be increased. Development should also enhance the pedestrian crossings across the South Circular.

Commented [SA632]: Amended for clarity and to aid policy implementation

Commented [SA633]: Respond to consultation – request for the word retention to be removed, to enable redevelopment to take place

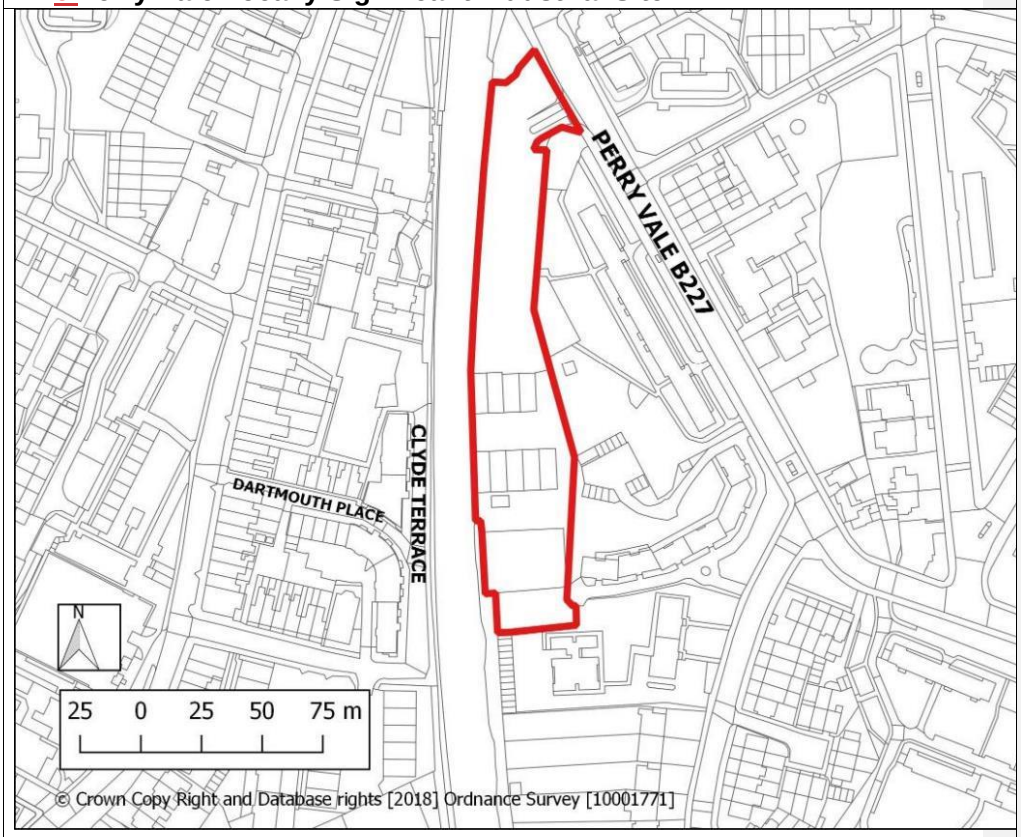
Commented [SA634]: Factual update – to reflect new policy numbers in Regulation 19 plan

Commented [SA635]: Respond to consultation – request to enhance walking and cycling surrounding the site and create a sense of arrival in the town centre.

6. Applicants should work in partnership with Thames Water and engage with them early to manage surface water and divert existing sewers where applicable. There are no anticipated capacity concerns for the sewer on Devonshire Road.

Commented [SA636]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~11~~ 6 Perry Vale Locally Significant Industrial Site



Site address:	67A Perry Vale, London, SE23 3HW			
Site details:	Site size (ha): 0.72, Setting: Urban, PTAL: In 2015: 4, In 2021: 3, In 2031: 3, Ownership: Mixed, public and private, Current use: Industrial, Car Park			
How site was identified:	Site Allocations Local Plan (2013), London SHLAA (2017) and Lewisham Call for Sites (2018)			
Planning designations and site considerations:	Growth Node, Locally Significant Industrial Site, District Centre, Night-time Economy Hub, Air Quality Focus Area, Flood Zone 1, Critical Drainage Area, adjacent to Strategic Open Space.			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15 Yes	Beyond 15 years ~~Yes~~
Indicative development capacity:	Net residential units: ~~122~~ 146		Gross non-residential floorspace Employment ~~4,324~~ 10,206 Main town centre 0	

Commented [SA637]: Factual update on designations

Commented [SA638]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

Site allocation

Comprehensive employment led mixed-use redevelopment. Co-location of compatible commercial, main town centre and residential uses.

Opportunities

The site comprises a Locally Significant Industrial Site and public car park. The LSIS is currently occupied by warehouse units and a mail depot. The site is located within Forest Hill District Centre, in proximity to Forest Hill station and along the approach to its east entrance from Perry Vale. Redevelopment and site intensification, along with the co-location of commercial and other uses, will provide a more optimal use of land and enable the delivery of new and improved workspace to support the long-term viability of the LSIS and town centre.

Development requirements

1. Landowners must work in partnership and All proposals must be delivered in accordance with a masterplan, to ensure the appropriate co-location, phasing and balance of employment and other uses across the site, in line with Policy DM3 (Masterplans and comprehensive development).
2. Development must not result in a net loss of industrial capacity, or compromise the functional integrity of the employment location, in line with Policy EC 5EC6 (Locally Significant Industrial Sites).
3. Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including enhancements to the station approach.

Development guidelines

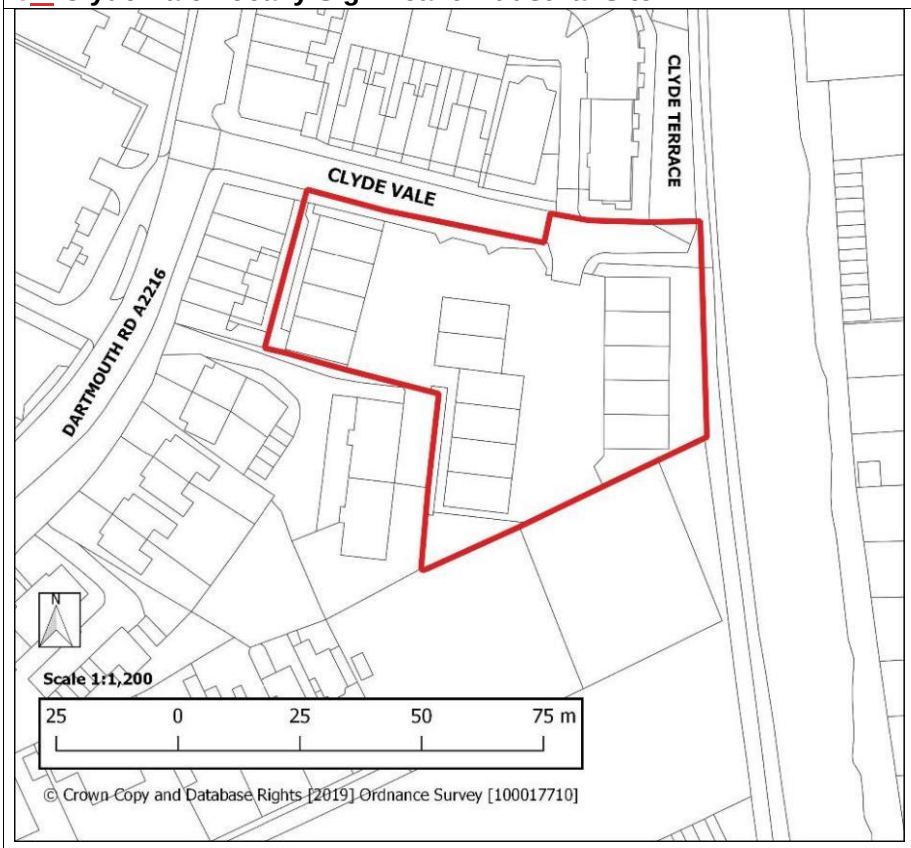
1. Non-employment uses, including residential uses, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses.
2. Development should be designed to provide for improved legibility and access to Forest Hill station through the site, and from Perry Vale.
3. For commercial uses, priority should be given to flexible workspace that complements provision in the Forest Hill Cultural Quarter. The site is large enough to accommodate the retention or re-provision of some larger commercial / light industrial units.
4. Development proposals should investigate opportunities to widen the site access from Perry Vale to better accommodate commercial and servicing vehicles.
5. Applicants should work in partnership with Thames Water and engage with them early to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan.

Commented [SA639]: Amended for clarity and to aid policy implementation

Commented [SA640]: Factual update – to reflect new policy numbers in Regulation 19 plan

Commented [SA641]: Suggested by Thames Water

~~6~~ 7 Clyde Vale Locally Significant Industrial Site



Site address:	Clyde Vale, London SE23			
Site details:	Site size (ha): 0.12, Setting: Urban, PTAL: In 2015: 4, In 2021: 4, In 2031: 4, Ownership: Mixed, public and private Current use: Industrial and residential			
How site was identified:	Site Allocations Local Plan (2013) and Strategic Planning Team (2019)			
Planning designations and site considerations:	Growth Node, Locally Significant Industrial Site, adjacent Conservation Area, adjacent to Strategic, ~~Public~~ Open Space, District Centre, ~~Primary Shopping Area~~, Night-time Economy Hub, Cultural Quarter, Flood Zone 1, Critical Drainage Area, Adjacent to Site of Importance for Nature Conservation.			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15	Beyond 15 years Yes
Indicative development capacity:	Net residential units: ~~15~~21		Gross non-residential floorspace: Employment ~~62~~41,701 Main town centre 0	

Commented [SA642]: Factual update – to reflect existing use of the site

Commented [SA643]: Factual update on designations

Commented [SA644]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

Site allocation

Comprehensive employment led mixed-use redevelopment. Co-location of compatible commercial and residential uses.

Opportunities

The site comprises a Locally Significant Industrial Site, located adjacent to the railway and in proximity to Forest Hill District Centre as well as 3 residential units. The existing commercial units are older and site access via Clyde Vale is constrained by the road's narrow width. Redevelopment and site intensification, along with the co-location of commercial and other uses, will enable the delivery of new and improved workspace ~~-~~to complement the Forest Hill Cultural Quarter, and help to support the vitality and viability of the LSIS and town centre.~~—.~~

Commented [SA645]: Factual update – to reflect existing use of the site.

Development requirements

1. Landowners must work in partnership and ~~All proposals must be delivered~~ in accordance with a masterplan, to ensure the appropriate co-location, phasing ~~-~~and balance of employment and other uses across the site, in line with Policy DM3 (Masterplans and comprehensive development).

Commented [SA646]: Amended for clarity and to aid policy implementation

~~1.~~2. Development must not result in a net loss of industrial capacity, or compromise the function~~al integrity~~ of the employment location, in line with Policy ~~EC 5~~EC6 (Locally Significant Industrial Sites).

Commented [SA647]: Factual update – to reflect new policy numbers in Regulation 19 plan

~~2.~~3. Positive frontages along Clyde Vale.

~~3.~~**4.** Delivery of new and improved public realm, in accordance with a site-wide public realm strategy.

Development guidelines

1. Non-employment uses, including residential uses, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses.
2. For commercial uses, priority should be given to flexible workspace that complements provision in the Forest Hill Cultural Quarter.
3. Develop~~e~~ment should be designed taking into account the green infrastructure towards the site's southern boundary, which provides a natural buffer between commercial and surrounding residential uses.
4. Development proposals should investigate opportunities to widen Clyde Vale to improve access for commercial and servicing vehicles.
5. Applicants should work in partnership with Thames Water and engage with them early to manage surface water and divert existing sewers where applicable. There is an opportunity to expand the surface water network and attenuation through green infrastructure to the south of the site.

Commented [SA648]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~7~~ 8 Featherstone Lodge, Eliot Bank

Site address:	Featherstone Lodge, Eliot Bank, London, SE23			
Site details:	Site size (ha): 0.64, Setting: Urban, PTAL: In 2015: 2, In 2021: 2, In 2031: 2, Ownership: Public, Current use: Housing estate			
How site was identified:	London SHLAA (2017)			
Planning designations and site considerations:	Growth Node, Flood Zone 1, Critical Drainage Area, Locally Listed Building on Site			
Planning Status:	None, consent has lapsed			
Timeframe for delivery:	Years 1-5 ~~Yes~~	Years 6-10	Years 11-15 Yes	Beyond 15 years
Indicative development capacity:	Net residential units: 33		Gross non-residential floorspace: Employment 0 Main town centre 0	

Commented [SA649]: Factual update on designations

Commented [SA650]: Capacities remain the same as Regulation 18 plan

Existing planning consent

DC/14/086666 – this application was granted in November 2015 but has now lapsed for ~~the demolition of the existing structures at Featherstone Lodge and the change of use of the main building to a senior co-housing development to provide 6 two bedroom, two storey duplex houses and 27 units comprising 12 one bedroom self-contained flats and 15 two bedroom self-contained flats, plus communal areas, a new roadway from Eliot Bank to the rear of 1-13 Knapdale Close, together with the felling of protected TPO trees and the provision of additional landscaping~~. alterations and additions to the existing lodge building, demolition of existing out buildings and construction of 4 terrace houses and a 3 – 4 storey block of flats to the rear, totalling 33 new residential units for over 55s housing.

Commented [SA651]: Factual update – to reflect the lapsed planning consent for the site.

Site allocation

Redevelopment for residential use.

Opportunities

Featherstone Lodge is a locally listed mid-19th Century house located at Eliot Bank and sits within gardens. Redevelopment of the site will provide for new high quality specialist housing in a characterful setting.

Development requirements

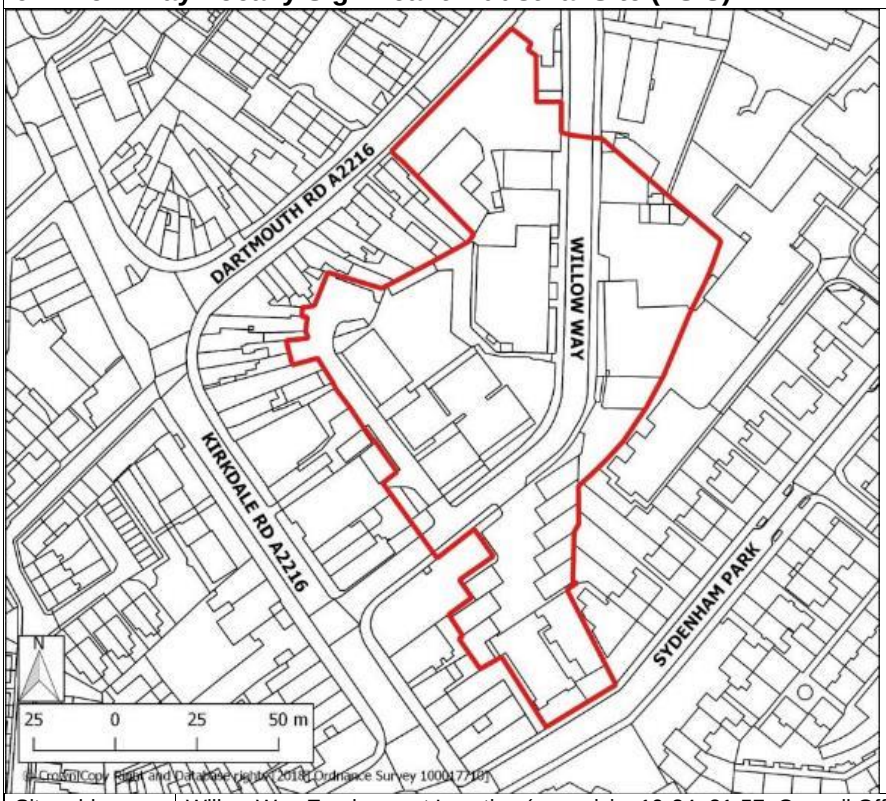
1. Delivery of predominantly specialist housing, with priority given to specialist older person's accommodation.
2. Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy, taking account of existing mature trees.
3. Retention and re-use of the main building, which is locally listed.

Development guidelines

1. The design of development should incorporate the re-use of the existing lodge as well as the provision of new buildings, in an integrated way across the whole site. Extensions to the Lodge should include pitched roofs to replicate the existing roofline.
2. A range of housing units should be provided to cater for varying needs of occupants, including flats within the Lodge as well as flats and houses set within the garden.
3. Consideration should be given to creating different elevational treatments for each building block, with architectural elements that match their surroundings and are appropriate to the rich visual character of the Lodge, and heritage assets within and adjacent to the site
4. The design of development should cater for the site elevations, sloping down from north-west to south-east.
5. A tree survey will be required to identify healthy, mature trees to be retained within the garden. 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.
6. Applicants should work in partnership with Thames Water and engage with them early to manage surface water and divert existing sewers where applicable. There are potential capacity concerns if connecting into Eliot Bank, connection should be downstream of manhole TQ34727802 where it increases to 229mm.

Commented [SA652]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

9 Willow Way Locally Significant Industrial Site (LSIS)



Site address:	Willow Way Employment Location (comprising10-24, 21-57, Council Offices and Depot Willow Way, Units 1-8 Willow Business Park and Church Hall and 1 Sydenham Park), SE26.			
Site details:	Site size (ha): 1.29, Setting: Urban, PTAL: In 2015: 4, In 2021: 4, In 2031: 4, Ownership: Mixed, public and private, Current use: Main town centre uses, Retail, Employment, Industrial, Car services, Car park			
How site was identified:	Site Allocation Local Plan (2013), London SHLAA (2017) and Lewisham Call for Sites (2015 and 2018)			
Planning designations and site considerations:	Growth Corridor, Locally Significant Industrial Site, adjacent Conservation Area, adjacent Local Centre, Area of Special Local Character, Flood Zone 1, Critical Drainage Area, adjacent Locally Listed Building			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10 Yes	Years 11-15 Yes	Beyond 15 years
Indicative development capacity:	Net residential units: 175		Gross non-residential floorspace: Employment 6,705 Main town centre 0	

Commented [SA653]: Factual update on designations

Commented [SA654]: Capacities remain the same as Regulation 18 plan

Site allocation

Comprehensive employment led mixed-use redevelopment. Co-location of compatible commercial, main town centre and residential uses. Reconfiguration of buildings and spaces to facilitate a new layout with new and improved routes, both into and through the site along with public realm and environmental enhancements.

Opportunities

The site comprises the Willow Way Locally Significant Industrial Site, which is located adjacent to Upper Sydenham/Kirkdale local centre and spans both sides of Willow Way. The site includes vacant land and a mix of lower density employment uses and 19 existing residential units. Redevelopment and site intensification, along with the co-location of commercial and other uses, will provide a more optimal use of land and enable the delivery of new and improved workspace to support the long-term viability of the LSIS. Development will also enable public realm enhancements to improve the quality of the townscape around the local centre, and help to make the area a safer and more attractive place for business and community activity.

Commented [SA655]: Factual update – to reflect that residential units exist on the site.

Development requirements

1. ~~All proposals must be delivered~~Landowners must work in partnership and in accordance with a masterplan, to ensure the appropriate ~~co-location~~ co-ordination, phasing and balance of ~~employment and other~~ uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). This must address the site's relationship with the Upper Sydenham / Kirkdale local centre, to improve the functional relationship with neighbouring uses and the public realm, along with townscape character.

Commented [SA656]: Respond to consultation – landowner request and
Amended for clarity and to aid policy implementation

2. The site contains an MOT centre which is in active use. Development proposals must adequately address the operational requirements of the MOT centre in order to secure a viable future for it. The landowner of the MOT centre must be consulted through the masterplan process.

Commented [SA657]: Respond to consultation – landowner request to reference the operational requirements and future viability of the MOT centre

3. Development must not result in a net loss of industrial capacity, or compromise the function~~al integrity~~ of the employment location, in line with Policy ~~EC 5~~EC6 (Locally Significant Industrial Sites).

Commented [SA658]: Factual update – to reflect new policy numbers in Regulation 19 plan

4. Positive frontages along Willow Way, Dartmouth Road and Sydenham Park, with active ground floor frontages. Positive frontages elsewhere throughout the site, where new routes are introduced.~~.~~

5. The site must be fully re-integrated with the surrounding street network to improve access and permeability in the local area. This includes a clear hierarchy of routes, with a legible and safe network of walking and cycle routes, through the site. Particular consideration must be given to the access and servicing arrangements for commercial uses.

6. Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy.

7. Development proposals must not adversely impact on the amenity of the public house located outside of the site boundary, in line with Policy EC19 (Public houses).

Commented [SA659]: Respond to consultation – landowner request to reference the amenity of the public house

Development guidelines

1. Non-employment uses, including residential uses, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along

with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses.

2. Main town centre uses may be acceptable but these must be ancillary to the commercial uses and not detract from viability of the local centre.

3. Enhanced permeability off Willow Way will be an essential element of the design. Proposals will be expected to investigate, and where feasible, deliver a new route(s) linking from Willow Way to Kirkdale and Dartmouth Roads.

4. Additional planting and landscaping should be integrated to enhance the public realm and encourage movement by walking and cycling along Willow Way.

5. Development should provide for a coherent building line along Willow Way, taking into account the redevelopment of the former Sydenham Police Station site.

6. The design of development must respond positively to the local context, giving particular consideration to heritage assets, including the Sydenham Park Conservation Area, Halifax Street Conservation Area, Jews Walk Conservation Area, Area of Special Local Character, as well as listed building and locally listed buildings along Kirkdale.

~~6.~~7. Applicants should work in partnership with Thames Water and engage with them early to manage surface water, divert existing sewers where applicable and ensure infra-structure upgrades are delivered ahead of the site being occupied through a housing phasing plan.

Commented [SA660]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~15~~ 10 74 to 78 Sydenham Road

Site address:	74 to 78 Sydenham Road, SE26 5QE			
Site details:	Site size (ha): 0.09, Setting: Other Centre, PTAL: In 2015: 5, In 2021:5, In 2031: 5, Ownership: Private, Current use: ~~Supermarket~~Gym			
How site was identified:	Strategic Planning Team (2019)			
Planning designations and site considerations:	Growth Corridor, Archaeological Priority Area, District Centre, Primary Shopping Area, Flood Zone 1			
Planning Status:	~~None~~Full application DC/19/115113 was granted consent in July 2020 and has been implemented. None for future redevelopment			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15	Beyond 15 years Yes
Indicative development capacity:	Net residential units: ~~18~~ 16		Gross non-residential floorspace: Employment ~~82~~ 164 Main town centre 328	

Commented [SA661]: Factual update – to reflect current land use

Commented [SA662]: Factual update on designations

Commented [SA663]: Factual update – to reflect planning consent granted for the site

Commented [SA664]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

Existing Planning Consent

DC/19/115113 - Full application for c~~C~~hange of use from retail unit (Class A1) to a gym/ leisure use unit (Class D2) at 74-78 Sydenham Road.

Site allocation

Mixed-use redevelopment with compatible main town centre and residential uses.

Opportunities

The site is located within Sydenham District Centre and situated at a prominent position on the High Street at Sydenham Road and Girton Road. It comprises of a two-storey building occupied by a ~~retail unit~~gym. Future r~~R~~edevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the vitality and viability of the town centre. The introduction of a new high quality building will also enhance the townscape and better complement the character of neighbouring properties.

Development requirements

1. ~~-~~Positive frontages along Sydenham Road and Girton Road, with active ground floor frontages.
2. Public realm enhancements along Sydenham Road.

Development guidelines

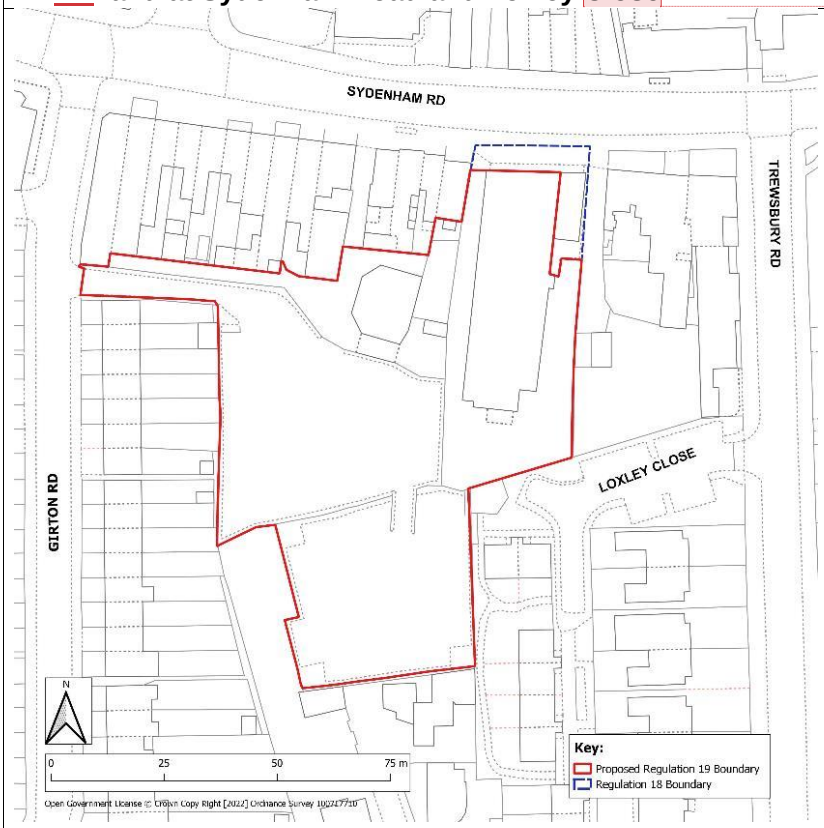
1. Development should respond positively to the character of adjoining and neighbouring properties, particularly the terraced buildings along the High Street.
2. Consideration will need to be given to the amenity of residential properties and gardens to the rear of the site, along Girton Road and Tannsfeld Road.
3. Public realm enhancements should include tree planting to complement existing trees along this part of the High Street.
4. ~~3.~~ Applicants should work in partnership with Thames Water and engage with them early to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan.

Commented [SA665]: Factual update – to reflect the planning consent granted for the site.

Commented [SA666]: Factual update – to reflect current land use.

Commented [SA667]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~12~~ 11 Land at Sydenham Road and Loxley Close



Site address:	Loxley Close, Sydenham, SE26 5DU			
Site details:	Site size (ha): ~~0.67~~ 0.64, Setting: Other Centre, PTAL: In 2015: 4-5, In 2021: 4-5, In 2031: 4-5, Ownership: Private, Current use: Retail, Residential, Car park			
How site was identified:	London SHLAA (2017), Strategic Planning Team (2019) and landowner engagement (2019)			
Planning designations and site considerations:	Growth Corridor, Archaeological Priority Area, District Centre, Flood Zone 1, Critical Drainage Area, adjacent Locally Listed Building			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10	Years 11-15	Beyond 15 years Yes
Indicative development capacity:	Net residential units: ~~131~~ 125		Gross non-residential floorspace: Employment ~~610~~ 582 Main town centre ~~2,439~~ 2,330	

Commented [SA668]: Respond to consultation – landowner requested an amendment to the site boundary to exclude the furniture shop

Commented [SA669]: Factual update on designations

Commented [SA670]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

Site allocation

Comprehensive town centre led, mixed-use redevelopment with compatible main town centre and residential uses. Public realm and environmental enhancements.

Opportunities

The site is located within Sydenham District Centre, with buildings at the northern part of the site fronting the High Street, and a car park behind. ~~The existing buildings do not make a positive contribution to the character of the townscape.~~ Redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the vitality and viability of the town centre. Development will also enable public realm enhancements and overall improvements to the townscape.

Commented [SA671]: Respond to consultation – request to remove this sentence

Development requirements

1. Positive frontages along Sydenham Road and Loxley Close, with active ground floor frontage~~s~~ on the High Street. ~~.~~The site must be fully re-integrated with the surrounding street network to improve access and permeability through the site and within the town centre, with new and enhanced walking and cycle routes.
2. Development must not adversely impact on the public house ~~adjacent to~~ near to the site's ~~at its~~ eastern boundary, in line with the Agent of Change principle.
3. Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy.

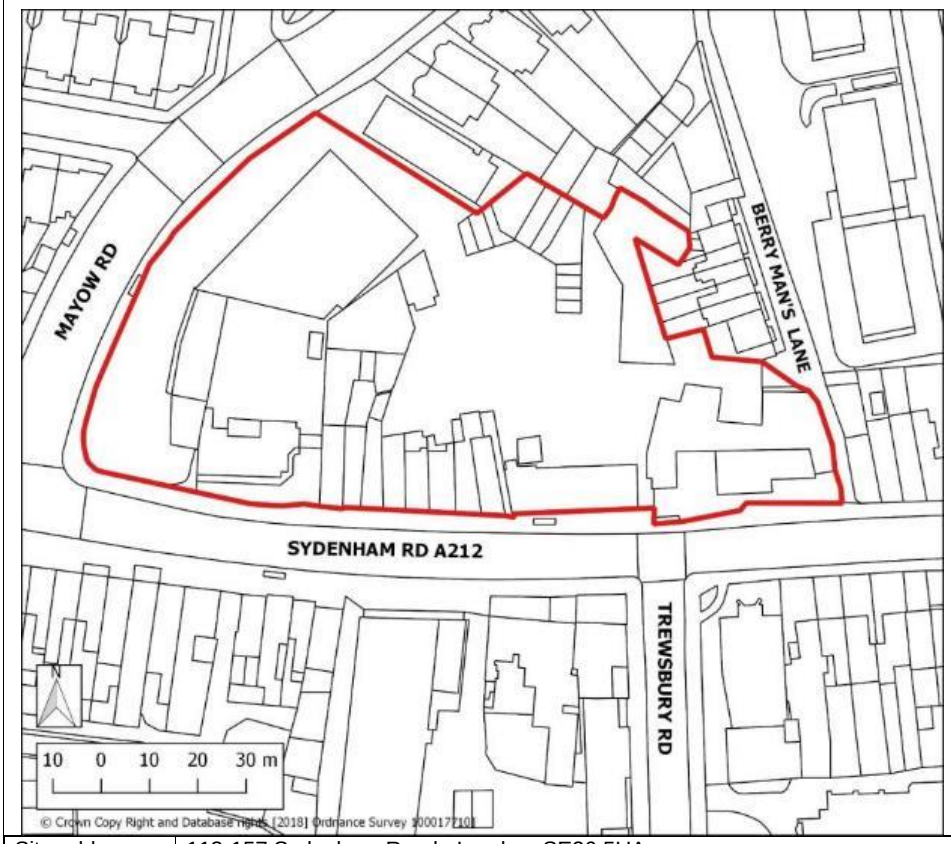
Commented [SA672]: Factual update – reflecting that the furniture shop is no longer included within the site allocation

Development guidelines

1. Development should make a more optimal use of land by considering options for the car park, including rationalising the existing level of provision, taking into account needs of visitors and businesses along with public transport accessibility levels.
2. ~~-~~Development, including building heights, should be designed to transition from the urban character along the High Street, to the predominantly residential character at the south.
3. Boundary landscaping should be used to protect and enhance the amenity of neighbouring residential properties.
4. The design of development should respond positively to the Sydenham Thorpes Conservation Area, the listed building on Trewsbury Road, and locally listed building on the eastern part of the site.
5. Opportunities should be investigated to provide for new or improved access to the allotments adjacent to the site at its southern boundary.
6. Applicants should work in partnership with Thames Water and engage with them early to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan.

Commented [SA673]: Respond to consultation – Thames Water requested additional text to cover water infrastructure.

~~13~~ 12 113-157 Sydenham Road



Site address:	113-157 Sydenham Road, London, SE26 5UA			
Site details:	Site size (ha): 0.86, Setting: Urban, PTAL: In 2015: 4-5, In 2021: 3-5, In 2031: 3-5, Ownership: Private, Current use: Main town centre uses, Retail, Public House, Car services			
How site was identified:	Site Allocations Local Plan (2013) and London SHLAA (2017)			
Planning designations and site considerations:	Growth Corridor, Archaeological Priority Area, adjacent Conservation Area, District Centre, Flood Zone 1, Critical Drainage Area, Locally Listed Building on site			
Planning Status:	None			
Timeframe for delivery:	Years 1-5	Years 6-10 ~~Yes~~	Years 11-15 Yes	Beyond 15 years
Indicative development capacity:	Net residential units: ~~168~~ 157		Gross non-residential floorspace: Employment ~~783~~ 1,565 Main town centre 3,130	

Commented [SA674]: Factual update on designations

Commented [SA675]: Capacities amended to reflect the revised methodology – see Site Allocations Background Paper Update (2022) for more details.

Site allocation

Comprehensive town centre led, mixed-use redevelopment with compatible main town centre, commercial and residential uses. Public realm and environmental enhancements.

Opportunities

The site is located within Sydenham District Centre,- and fronts the northern side of the High Street. It is occupied predominantly by automotive commercial operators, including a car dealers and parts supplier. Redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land to support the vitality and viability of the town centre. Development will also enable public realm and townscape improvements, along with uses that better complement the neighbouring residential properties.

Development requirements

1. Positive frontages along Sydenham Road, Mayow Road and Berry Man's Lane, with active ground floor frontages on the High Street.
2. The maximum viable amount of employment floorspace must be re-provided, in line with Policy ~~EC7~~ EC8 (Non-designated employment sites).
3. The site must be fully re-integrated with the surrounding street network to improve access and permeability- through the site and within the town centre, with new and enhanced walking and cycle routes.
4. Delivery of new and improved public realm, in accordance with a site-wide public realm strategy.
5. Development must not adversely impact character or amenity of the public house within the site, which is locally listed.

Development guidelines

1. An assessment should be carried out to determine which buildings and spaces are of heritage value; which should be retained and those that may be more suitable for redevelopment. The locally listed Dolphin public house and garden must be retained, and development must conserve and enhance its historic significance and setting, including the attractive views of the west-facing gable end of the pub.
2. The design of development should respond positively to the existing residential properties surrounding the site. In particular it should preserve the setting of ~~,~~ ~~particularly within~~ the Sydenham Thorpes Conservation Area to the west and provide a contextual response to the terrace of Victorian cottages on Berrymans Lane to the east.
3. Applicants should work in partnership with Thames Water and engage with them early to manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan.

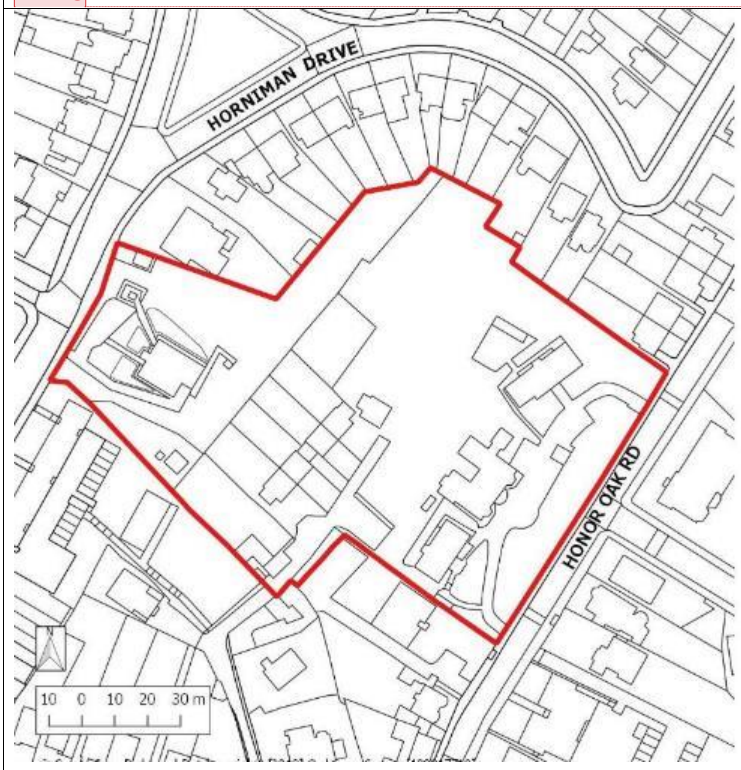
Commented [SA676]: Factual update – to reflect new policy numbers in Regulation 19 plan

Commented [SA677]: Respond to consultation – request that reference is made to the gable end of the pub.

Commented [SA678]: Respond to consultation – request that the setting of the Berrymans Lane cottages is included

Commented [SA679]: Respond to consultation - Thames Water request to provide text relating to water infrastructure.

~~4 Havelock House, Telecom Site and Willow Tree House, near Horniman Drive~~



~~Site address:~~	~~Havelock House, Honor Oak Road, Forest Hill, London SE23 3SA~~			
~~Site details:~~	~~Site size (ha): 1.48, Setting: Urban, PTAL: In 2015: 3, In 2021: 3, In 2031: 3, Ownership: Private, Current use: Telecoms, Residential~~			
~~How site was identified:~~	~~Lewisham Call for Sites (2015) and London SHLAA (2017)~~			
~~Planning designations and site considerations:~~	~~Adjacent Conservation Area, Air Quality Management Area, Flood Zone 1, Critical Drainage Area~~			
~~Planning Status:~~	~~None~~			
~~Timeframe for delivery:~~	~~2020/21 – 2024/25~~	~~2025/26 – 2029/30~~	~~2030/31 – 2034/35~~	~~2035/36 – 3039/40~~
~~Indicative development capacity:~~	~~Net residential units: 30~~		~~Gross non-residential floorspace: Employment 0 Main town centre 0~~	

Commented [SA680]: Respond to consultation – the site allocation has been removed from the Plan following objections relating to the loss of green infrastructure that would arise from redeveloping this site

~~Site allocation~~

~~Redevelopment of backland site for residential use.~~

~~Opportunities~~

~~The site is located on the western side of Honor Oak Road where three large buildings containing flatted properties are set within greenspace and mature trees. Redevelopment of the backland portion of the site will provide a more optimal use of the land by introducing new housing whilst retaining residential amenity for surrounding properties.~~

~~Development requirements~~

- ~~Delivery of new and improved public realm, in accordance with a site-wide public realm strategy, taking account of existing mature trees.~~

~~Development guidelines~~

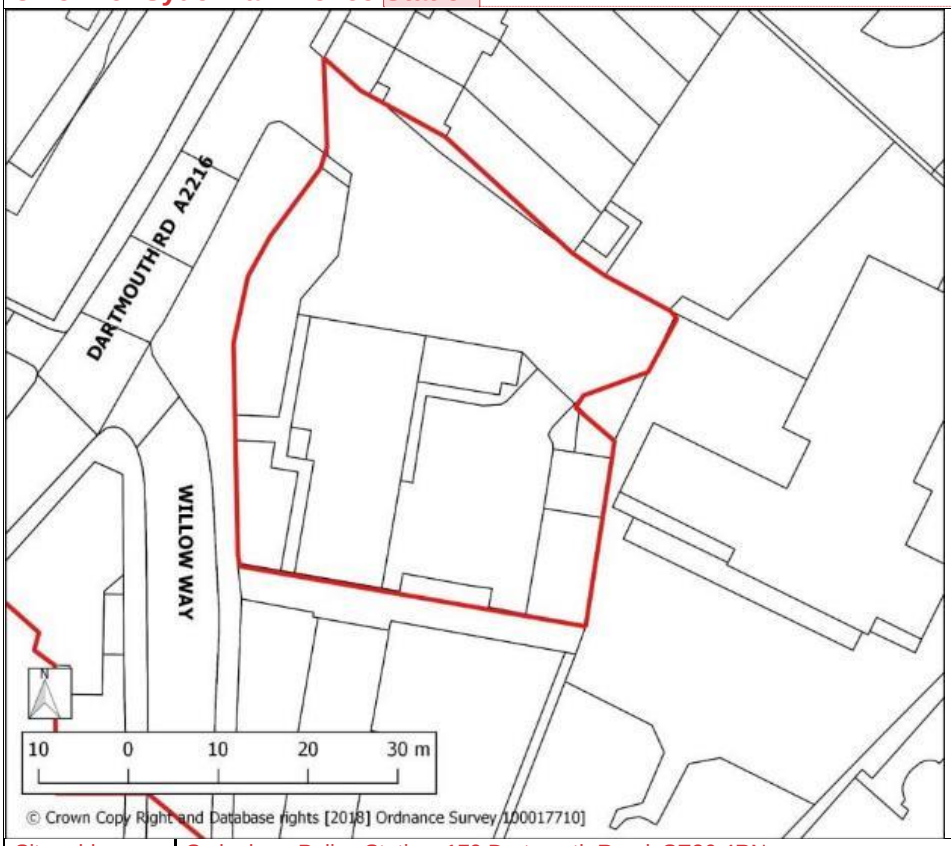
~~13. An assessment of the existing buildings should be undertaken to inform development options~~

~~14. Where feasible, a new east-west walking route should be integrated into the site to improve connections between Honor Oak Road and Horniman Drive.~~

~~15. 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. The soft, green frontage onto Honor Oak Road should be retained.~~

~~16. The design of development should preserve and enhance the character and setting of the nearby Forest Hill Conservation Area, as well as Listed and Locally Listed buildings..~~

~~8 Former Sydenham Police Station~~



~~Site address:~~	~~Sydenham Police Station, 179 Dartmouth Road, SE26 4RN~~
~~Site details:~~	~~Site size (ha): 0.20, Setting: Urban, PTAL: In 2015: 4, In 2021: 4, In 2031: 4, Ownership: Private, Current use: Police station~~
~~How site was identified:~~	~~Strategic Planning Team (2019)~~
~~Planning designations and site considerations:~~	~~Flood Zone 1, Critical Drainage Area, adjacent Locally Listed Building~~
~~Planning Status:~~	~~Full application DC/15/092798 granted in May 2016.~~
~~Timeframe for delivery:~~	~~2020/21 – 2024/25~~ | ~~2025/26 – 2029/30~~ | ~~2030/31 – 2034/35~~ | ~~2035/36 – 3039/40~~
~~Indicative development capacity:~~	~~Net residential units: 33~~ | ~~Non-residential floorspace: Employment 0 Main town centre 0~~

Commented [SA681]: Factual update – this site allocation has been removed from the Plan as the site was granted consent in May 2016 and has now been completed

Existing planning consent

DC/15/92798 - The demolition of the former Sydenham Police Station and the construction of 15 one bedroom, 15 two bedroom and 3 three bedroom self-contained flats, together with associated landscaping.

Site allocation

Redevelopment for residential use.

Opportunities

This site consists of a vacant police station located off Dartmouth Road, and in proximity to the junction with Willow Way. Redevelopment will bring the site back into active use , and enable public realm ehancements to improve the amenity of the local area.

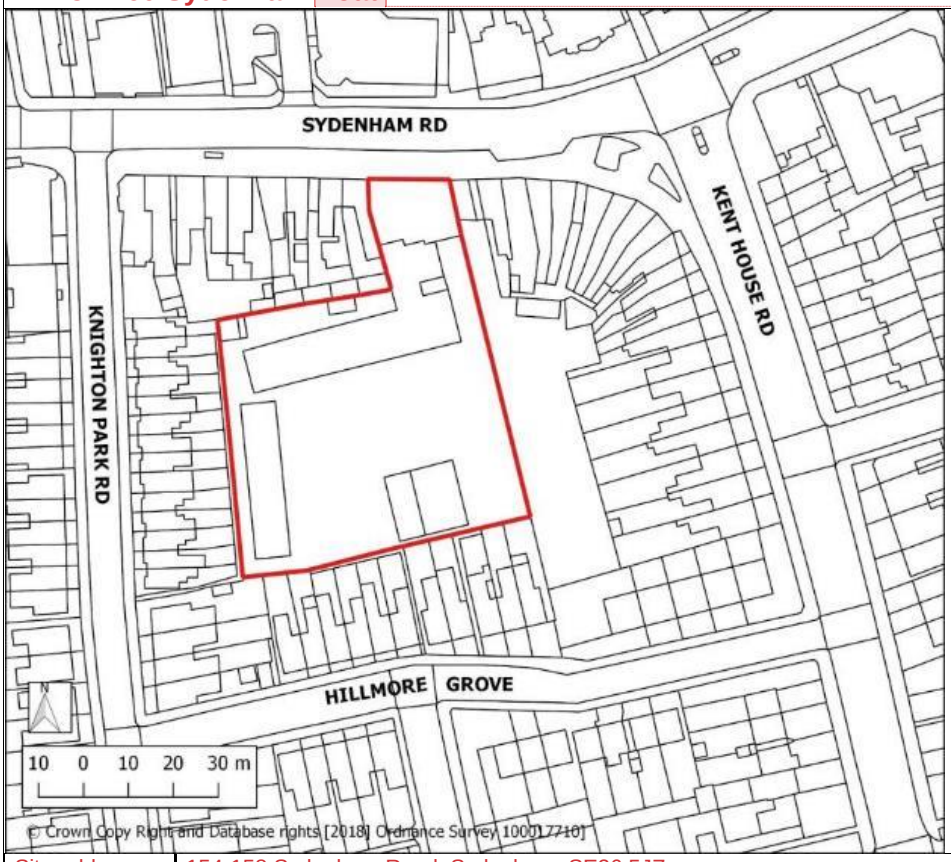
Development requirements

- Positive frontages and public realm enhancements along Willow Way and Dartmouth Roads.
- Delivery of new and improved public realm, in accordance with a site-wide public realm strategy.

Development guidelines

17. To achieve the optimal use of land, the existing car park should be rationalised and redeveloped with replacement provision that reflects the public transport accessibility levels.
18. The design of development, including new buildings, should be proportionate to the surrounding townscape taking into account the setting of the Conservation Area and locally listed building, adjacent the site.
19. Development should provide for a coherent building line along Willow Way to create a continuation in the streetscape.
20. The Willow Way LSIS is located at the site's southern boundary. Proposals must address the relationship between residential and neighbouring commercial uses, particularly for amenity.

~~14 154-160 Sydenham Road~~



~~Site address:~~	~~154-158 Sydenham Road, Sydenham, SE26 5JZ~~			
~~Site details:~~	~~Site size (ha): 0.39, Setting: Urban, PTAL: In 2015: 3-4, In 2021: 3-4, In 2031: 3-4, Ownership: Private, Current use: Vacant land~~			
~~How site was identified:~~	~~Site Allocations Local Plan (2013), Lewisham Call for Sites (2015), London SHLAA (2017) and landowner engagement (2019)~~			
~~Planning designations and site considerations:~~	~~Archaeological Priority Area, District Centre, Flood Zone 1, Critical Drainage Area~~			
~~Planning Status:~~	~~Full application DC/17/104571 granted in July 2019~~ and			
~~Timeframe for delivery:~~	~~2020/21 – 2024/25~~ ~~Yes~~	~~2025/26 – 2029/30~~	~~2030/31 – 2034/35~~	~~2035/36 – 3039/40~~
~~Indicative development capacity:~~	~~Net residential units: 79~~		~~Gross non-residential floorspace: Employment 355 Main town centre 1,420~~	

~~Existing planning consent~~

Commented [SA682]: Factual update – this site allocation has been removed from the Plan as the site has planning consent and is nearing completion.

DC/17/104571 - The construction of 18 one, two and three bedroom self-contained flats, 10 three bedroom houses, 1 two bedroom maisonette and 155m^2 ground and first floor commercial floorspace (A1, A2, B1, D1, D2), together with associated parking and landscaping.

Site allocation

Mixed-use redevelopment with compatible main town centre and residential uses.

Opportunities

The site contains vacant land and buildings, including a large backland area. The northern part of the site is located within Sydenham District Centre.l. Redevelopment will bring the site back into active use, with a mix of uses that support the vitality and viability of the town centre. Development can also enable public realm enhancements. .

Development requirements

- Positive frontages along Sydenham Road, including active ground floor frontages

Development guidelines

8. The design should respond positively to the the backland nature of the site, ensuring the heights of new buildings are sensitive to the character and amenity of existing residential properties.

9. Landscaping and boundary treatments should be used protect the amenity of neighbouring properties.