

Draft Lewisham Local Plan to 2040

Habitats Regulations Assessment
Regulation 19 Stage Version

Lewisham Borough Council

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1. Introduction

Background to the Project

- 1.1 AECOM has been appointed by the London Borough of Lewisham to assist in producing a report to inform the Council's Habitats Regulations Assessment (HRA) of the potential effects of Lewisham Local Plan on the National Site Network and Ramsar sites. The objectives of the assessment are to:
- Identify any aspects of the Local Plan that would cause an adverse effect on the integrity of the National Site Network, otherwise known as European designated sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), protected SPAs (pSPAs) and, as a matter of Government policy, Ramsar sites), either alone or in combination with other plans and projects; and
 - To advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.
- 1.2 The HRA of the Lewisham Local Plan is required to determine if there are any realistic linking pathways present between a European site and the Local Plan and where Likely Significant Effects cannot be screened out, an analysis to inform Appropriate Assessment to be undertaken to determine if adverse effects on the integrity of the European designated sites will occur as a result of the Local Plan alone or in combination.

Legislation

- 1.3 The need for HRA is set out within the Conservation of Habitats & Species Regulations 2017 (**Box 1**). European designated sites can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to European designated sites.

Box 1: The legislative basis for Appropriate Assessment

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

"A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... must make an appropriate assessment of the implications for the plan or project in view of that site's conservation objectives... The competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site."

- 1.4 The Habitats Regulations applies the precautionary principle to European designated sites (SAC and SPA). As a matter of UK Government policy, Ramsar sites are given equivalent status. For the purposes of this assessment candidate SACs (cSACs), proposed SPAs (pSPAs) and proposed Ramsar (pRamsar) sites are all treated as fully designated sites. In this report we use the term "European designated sites" to refer collectively to the sites listed in this paragraph.
- 1.5 Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. This contrasts with the SEA Directive which does not prescribe how plan or programme proponents should respond to the findings of an environmental assessment; merely that the assessment findings (as documented in the 'environmental report') should be 'taken into account' during preparation of the plan or programme. In the case of the Habitats Directive, plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

- 1.6 In 2018, the 'People Over Wind' European Court of Justice (ECJ) ruling¹ determined that 'mitigation' (i.e. measures that are specifically introduced to avoid or reduce the harmful effects of a plan or project on European designated sites) should not be taken into account when forming a view on likely significant effects. Mitigation should instead only be considered at the appropriate assessment stage. Appropriate assessment is not a technical term: it simply means 'an assessment that is appropriate' for the plan or project in question. As such, the law purposely does not prescribe what it should consist of or how it should be presented; these are decisions to be made on a case by case basis by the competent authority.
- 1.7 Over the years the phrase 'Habitats Regulations Assessment' has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an 'Appropriate Assessment'. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

Report Layout

- 1.8 **Chapter 2** of this report explains the process by which the HRA has been carried out. **Chapter 3** explores the relevant pathways of impact. **Chapter 4** summarises the Test of Likely Significant Effects of the policies and site allocations of the Plan considered 'alone' and 'in-combination' (The Test of Likely Significant Effects itself is undertaken in **Appendix B**). **Chapter 5** contains the conclusion.

¹ Case C-323/17

2. Methodology

Introduction

- 2.1 This section sets out the approach and methodology for undertaking the Habitats Regulations Assessment (HRA). HRA itself operates independently from the Planning Policy system, being a legal requirement of a discrete Statutory Instrument. Therefore, there is no direct relationship to the National Planning Policy Framework (NPPF) and the 'Tests of Soundness'.

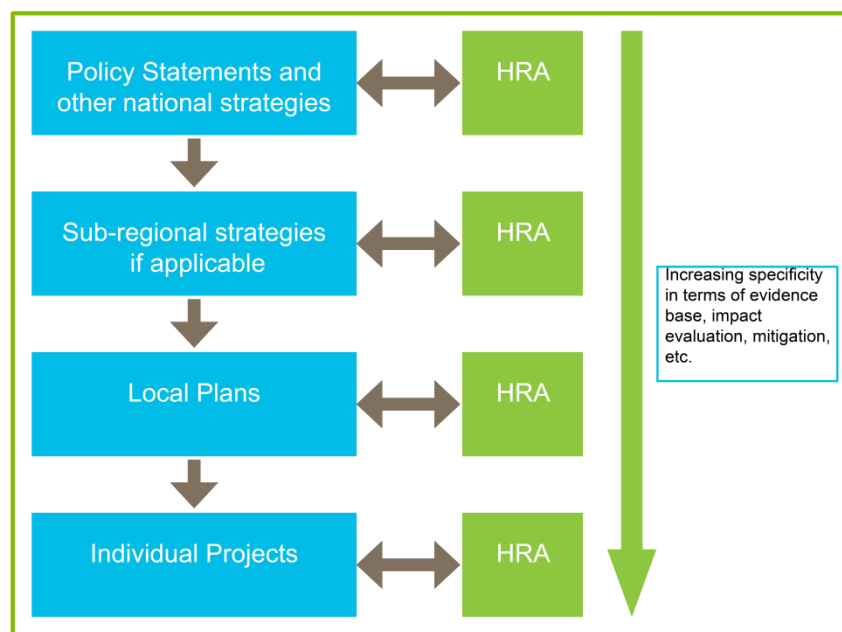
A Proportionate Assessment

- 2.2 Project-related HRA often requires bespoke survey work and novel data generation in order to accurately determine the significance of effects. In other words, to look beyond the risk of an effect to a justified prediction of the actual likely effect and to the development of avoidance or mitigation measures.
- 2.3 However, the draft MHCLG guidance² (described in greater detail later in this chapter) makes it clear that when implementing HRA of land-use plans, the Appropriate Assessment (AA) should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself.
- 2.4 *"The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project."*
- 2.5 More recently, the Court of Appeal³ ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be "*achieved in practice*" then this would suffice to meet the requirements of the Habitat Regulations. This ruling has since been applied to a planning permission (rather than a Plan document)⁴. In this case the High Court ruled that for "*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations*".
- 2.6 In other words, there is a tacit acceptance that AA can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers as illustrated in **Box 2**.

² MHCLG (2006) Planning for the Protection of European designated sites, Consultation Paper

³ No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

⁴ High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

Box 2: Tiering in HRA of Land Use Plans

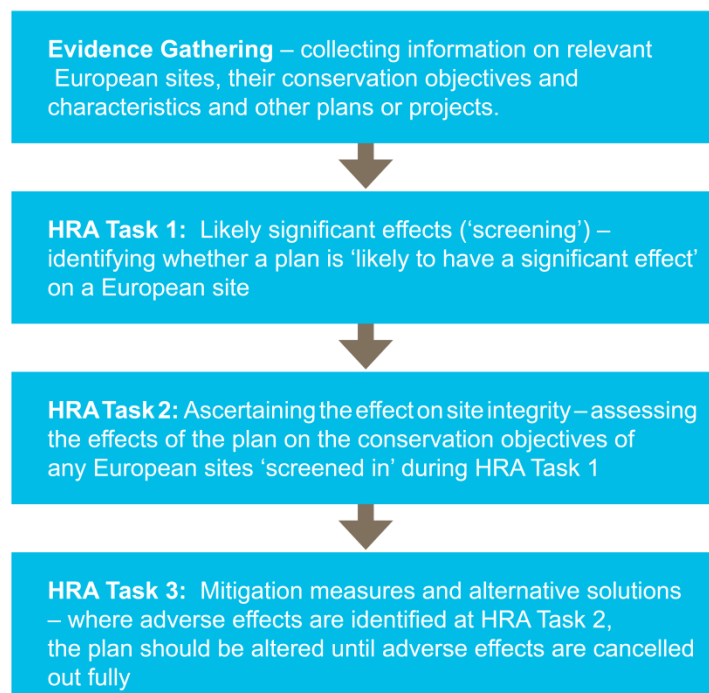
- 2.7 The most robust and defensible approach to the absence of fine grain detail at this level is to make use of the precautionary principle. In other words, the plan is never given the benefit of the doubt (within the limits of reasonableness); it must be assumed that a policy/measure is likely to have an impact leading to a significant adverse effect upon an internationally designated site unless it can be clearly established otherwise.

The Process of HRA

- 2.8 The HRA is being carried out in the continuing absence of formal central Government guidance. The former DCLG released a consultation paper on AA of Plans in 2006⁵. As yet, no further formal guidance has emerged from MHCLG on the assessment of plans. However, central government have released general guidance on appropriate assessment⁶
- 2.9 **Box 3** outlines the stages of HRA according to the draft MHCLG guidance (which, as government guidance applicable to English authorities is considered to take precedence over other sources of guidance). The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no likely significant effects remain.

⁵ MHCLG (2006) Planning for the Protection of European designated sites, Consultation Paper

⁶ <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

Box 3: Four-Stage Approach to Habitats Regulations Assessment

2.10 The following process has been adopted for carrying out the subsequent stages of the HRA.

Task One: Test of Likely Significant Effect

2.11 The first stage of any Habitats Regulations Assessment is a test of Likely Significant Effect - essentially a high-level assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

2.12 *"Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European designated sites?"*

2.13 In evaluating significance, AECOM have relied on professional judgment and experience of working with the other local authorities on similar issues. The level of detail concerning developments that will be permitted under land use plans is rarely sufficient to make a detailed quantification of effects. Therefore, a precautionary approach has been taken (in the absence of more precise data) assuming as the default position that if a likely significant effect (LSE) cannot be confidently ruled out, then the assessment must be taken the next level of assessment Task Two: Appropriate Assessment. This is in line with the April 2018 court ruling relating to 'People Over Wind' where mitigation and avoidance measures are to be included at the next stage of assessment.

Task Two: Appropriate Assessment

2.14 European Site(s) which have been 'screened in' during the previous Task have a detailed assessment undertaken on the effect of the policies on the European site(s) site integrity. Avoidance and mitigation measures to avoid adverse significant effects are taken into account or recommended where necessary.

2.15 As established by case law, 'appropriate assessment' is not a technical term; it simply means whatever further assessment is necessary to confirm whether there would be adverse effects on the integrity of any European designated sites that have not been dismissed at screening. Since it is not a technical term it has no firmly established methodology except that it essentially involves repeating the analysis for the likely significant effects stage, but to a greater level of detail on a smaller number of policies and sites, this time with a view to determining if there would be adverse effects on integrity.

2.16 One of the key considerations during Appropriate Assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the Appropriate Assessment takes any policies or allocations that could not be dismissed following the high-level Screening analysis and analyse the potential

for an effect in more detail, with a view to concluding whether there would actually be an adverse effect on Integrity (in other words, disruption of the coherent structure and function of the European site(s)). Note that this report only covers the Likely Significant Effect stage of HRA.

The Scope

2.17 There is no guidance that dictates the physical scope of an HRA of a plan. Therefore, in considering the physical scope of the assessment we were guided primarily by the identified impact pathways rather than by arbitrary “zones”, i.e. a source-pathway-receptor approach. Current guidance suggests that the following European designated sites be included in the scope of assessment:

- All sites within the Local Plan area boundary; and
- Other sites shown to be linked to development within the Local Plan boundary through a known “pathway” (discussed below).

2.18 Briefly defined, pathways are routes by which a change in activity within the plan area can lead to an effect upon a European site. In terms of the second category of European site listed above, MHCLG guidance states that the AA should be “*proportionate to the geographical scope of the [plan policy]*” and that “*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*” (MHCLG, 2006, p.6).

2.19 Locations of European designated sites are illustrated in **Figure 1**, and full details of all European designated sites discussed in this document can be found in **Appendix A**, specifying their qualifying features, conservation objectives and threats to integrity. Table 1 below lists all those European designated sites included in this HRA.

Note that the inclusion of a European designated sites or pathway below does not indicate that an effect is expected but rather that these are pathways that will be investigated.

Table 1: Physical Scope of the HRA

European Designated Site	Location	Reason for Inclusion (pressures/threats ⁷ associated with the European site that could link to the Plan)	Other site vulnerabilities
Epping Forest SAC	9.4 km North	- Air pollution: impact of atmospheric nitrogen - Public access / disturbance - Water pollution	- Undergrazing - Changes in species distribution - Inappropriate water levels - Invasive species - Disease
Lee Valley SPA and Ramsar	9.0 km North	- Water pollution - Public access / disturbance - Air pollution: risk of atmospheric nitrogen deposition	- Hydrological changes - Inappropriate scrub control - Fisheries: fish stocking - Invasive species - Inappropriate cutting / mowing
Wimbledon Common SAC	10.2 km West	• Public access / disturbance • Air pollution: impact of atmospheric nitrogen deposition	- Habitat fragmentation - Invasive species
Richmond Park SAC	12.5 km West	There are no recorded vulnerabilities	

⁷ As identified in the Site Improvement Plans or RAMS for European designated sites.

Thames Estuary 26.4 km East (38. km and Marshes SPA 7 km and Ramsar ⁸ downstream)	- Water pollution	- Coastal squeeze
	- Public access / disturbance	- Invasive species
	- Air pollution: risk of atmospheric nitrogen deposition	- Change in species distributions
		- Fisheries: commercial marine and estuarine
		- Vehicles: illicit

The 'in Combination' Scope

- 2.20 It is a requirement of the Regulations that the impacts and effects of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the European designated site(s) in question.
- 2.21 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. The overall approach is to exclude the risk of there being unassessed likely significant effects in accordance with the precautionary principle. This was first established in the seminal Waddenzee⁹ case.
- 2.22 For the purposes of this HRA, we have determined that the key other documents with a potential for in-combination effects is the Draft London Plan 2019. This plan sets out the broad spatial development targets for the Greater London over the next 20 – 25 years, which covers 32 boroughs.
- 2.23 The London Plan originally set out the need for approximately 66,000 new homes per year across Greater London. It stated that *'there is capacity across London for approximately 40,000 new homes a year on large sites... [and] also shows that there is capacity for development on small sites for 24,500 new homes a year'*. The plan outlines the 10-year housing targets for each Planning Authority as contained in the London Plan going through Examination is presented in Table 2 below.
- 2.24 As shown in the table, residential growth in the Lewisham Borough (at the top of the table) is only targeted to account for 3.26% of the growth in Greater London over the next 10-year period. Nevertheless, the potential for Lewisham's contribution – however small – to an in-combination effect arising from increased development throughout Greater London, must be considered.

Table 2: 10-year targets for net housing completions (2019/20 – 2028/29)

Planning Authority	Residential Growth (dwellings)
Lewisham	21,170
Barking & Dagenham	22,640
Barnet	31,340
Bexley	12,450
Brent	29,150
Bromley	14,240
Camden	10,860
City of London	1,460
Croydon	29,490
Ealing	28,070
Enfield	18,760

⁸ Thames Estuary and Marshes SPA and Ramsar has been included within the physical scope as although it is outside of the 15 km search area it is downstream of the borough and so will be assessed for water pollution through increased effluent in-combination with the other boroughs in London which discharge to the Thames.

⁹ Waddenzee case (Case C-127/02, [2004] ECR-I 7405)

Greenwich	32,040
Hackney	13,300
Hammersmith & Fulham	16,480
Haringey	19,580
Harrow	13,920
Havering	18,750
Hillingdon	15,530
Hounslow	21,820
Islington	7,750
Kensington & Chelsea	4,880
Kingstone	13,640
Lambeth	15,890
London Legacy Development Corporation	21,610
Merton	13,280
Newham	38,500
Old Oak Park Royal Development Corporation	13,670
Redbridge	19,790
Richmond	8,110
Southwark	25,540
Sutton	9,390
Tower Hamlets	35,110
Waltham Forest	17,940
Wandsworth	23,100
Westminster	10,100
Total	649,350

- 2.25 Following the Examination in Public of the Draft New London Plan, the Inspectors recommended that the total housing target for London be reduced from 649,350 to 'just under 523,000'.
- 2.26 It should be noted that, while the broad potential impacts of the London Plan will be considered, this document does not carry out a full HRA of this Plan. Instead it draws upon existing HRAs that have been carried out on the Plan.

3. Pathways of Impact

3.1 The following pathways of impact are considered relevant to the HRA of the Plan:

- Recreational pressure
- Water Quality and Water Resources
- Air pollution (Atmospheric Nitrogen Deposition)

Recreational Pressure

3.2 Recreational use of a European site has the potential to:

- Cause disturbance to sensitive species, particularly ground-nesting birds and (where relevant) wintering wildfowl.
- Cause damage through erosion and fragmentation;
- Cause eutrophication as a result of dog fouling; and
- Prevent appropriate management or exacerbate existing management difficulties;

3.3 Different types of European designated sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex.

3.4 It should be emphasised that recreational use is not inevitably a problem. Many European designated sites also contain nature reserves managed for conservation and public appreciation of nature.

3.5 HRAs of Local Plans tend to focus on recreational sources of disturbance as a result of new residents¹⁰.

Activities causing disturbance

3.6 Disturbing activities are on a continuum. The most disturbing activities are likely to be those that involve irregular, infrequent, unpredictable loud noise events, movement or vibration of long duration. The presence of people and dogs generate a substantial disturbance effects because of the areas accessed and the impact of a potential predator on bird behaviour. Birds are least likely to be disturbed by activities that involve regular, frequent, predictable, quiet patterns of sound or movement or minimal vibration. The further any activity is from the birds, the less likely it is to result in disturbance.

3.7 The factors that influence a species response to a disturbance are numerous, but the three key factors are species sensitivity, proximity of disturbance sources and timing/duration of the potentially disturbing activity.

3.8 The distance at which a species takes flight when approached by a disturbing stimulus is known as the 'tolerance distance' (also called the 'escape flight distance') and differs between species to the same stimulus and within a species to different stimuli.

3.9 The potential for apparent disturbance may be less in winter than in summer, in that there are often a smaller number of recreational users. In addition, the consequences of disturbance at a population level may be reduced because birds are not breeding. However, activity outside of the summer months can still cause important disturbance, especially as birds are particularly vulnerable at this time of year due to food shortages. Disturbance which results in abandonment of suitable feeding areas can have severe consequences for those birds involved and their ability to find alternative feeding areas. Several empirical studies have, through correlative analysis, demonstrated that out-of-season (October-March) recreational activity can result in quantifiable disturbance:

¹⁰ The RTP1 report 'Planning for an Ageing Population' (2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.

- Tuite et al¹¹ found that during periods of high recreational activity, bird numbers at Llangorse Lake decreased by 30% as the morning progressed, matching the increase in recreational activity towards midday. During periods of low recreational activity, however, no change in numbers was observed as the morning progressed. In addition, all species were found to spend less time in their 'preferred zones' (the areas of the lake used most in the absence of recreational activity) as recreational intensity increased;
 - Underhill et al¹² counted waterfowl and all disturbance events on 54 water bodies within the South West London Water Bodies Special Protection Area and clearly correlated disturbance with a decrease in bird numbers at weekends in smaller sites and with the movement of birds within larger sites from disturbed to less disturbed areas.
- 3.1 Human activity can affect birds either directly (e.g. through causing them to flee) or indirectly (e.g. through damaging their habitat). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to behavioural changes (e.g. alterations in feeding behaviour, avoidance of certain areas *etc.*) and physiological changes (e.g. an increase in heart rate) that, although less noticeable, may ultimately result in major population-level effects by altering the balance between immigration/birth and emigration/death¹³. The impact of disturbance on birds changes during the seasons in relation to a number of very specific factors, for example the winter below freezing temperature, the birds fat resource levels and the need to remain watchful for predators rather than feeding. These considerations lead to birds apparently showing different behavioural responses at different times of the year.
- 3.2 The degree of impact that varying levels of noise will have on different species of bird is poorly understood except that a number of studies have found that an increase in traffic levels on roads does lead to a reduction in the bird abundance within adjacent hedgerows - Reijnen et al (1995) examined the distribution of 43 passerine species (i.e. 'songbirds'), of which 60% had a lower density closer to the roadside than further away. By controlling vehicle usage, they also found that the density generally was lower along busier roads than quieter roads¹⁴.

Mechanical/abrasive damage and nutrient enrichment

- 3.3 Most types of aquatic or terrestrial European site can be affected by trampling, which in turn causes soil compaction and erosion:
- Wilson & Seney (1994)¹⁵ examined the degree of track erosion caused by hikers, motorcycles, horses and cyclists from 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.
 - Cole et al (1995a, b)¹⁶ conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each tramped between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphological characteristics were found to explain more variation in response between different vegetation types than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were

¹¹ Tuite, C. H., Owen, M. & Paynter, D. 1983. Interaction between wildfowl and recreation at Llangorse Lake and Talybont Reservoir, South Wales. *Wildfowl* 34: 48-63

¹² Underhill, M.C. et al. 1993. Use of Waterbodies in South West London by Waterfowl. An Investigation of the Factors Affecting Distribution, Abundance and Community Structure. Report to Thames Water Utilities Ltd. and English Nature. Wetlands Advisory Service, Slimbridge

¹³ Riley, J. 2003. Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

¹⁴ Reijnen, R. et al. 1995. The effects of car traffic on breeding bird populations in woodland. III. Reduction of density in relation to the proximity of main roads. *Journal of Applied Ecology* 32: 187-202

¹⁵ Wilson, J.P. & J.P. Seney. 1994. Erosional impact of hikers, horses, motorcycles and off road bicycles on mountain trails in Montana. *Mountain Research and Development* 14:77-88

¹⁶ Cole, D.N. 1995a. Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* 32: 203-214

Cole, D.N. 1995b. Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* 32: 215-224

considered least resistant. Cover of hemipterophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.

- Cole (1995c)¹⁷ conducted a follow-up study (in 4 vegetation types) in which shoe type (trainers or walking boots) and trampler weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no difference in effect on cover.
 - Cole & Spildie (1998)¹⁸ experimentally compared the effects of off-track trampling by hiker and horse (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse traffic was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Higher trampling intensities caused more disturbance.
- 3.4 Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths and also tend to move in a more erratic manner. Sites being managed by nature conservation bodies and local authorities frequently resort to hardening eroded paths to restrict erosion but at the same time they are losing the habitats formerly used by sand lizards and burrowing invertebrates. Motorcycle scrambling and off-road vehicle use can cause more serious erosion, as well as disturbance to sensitive species. Boats can also cause some mechanical damage to intertidal habitats through grounding as well as anchor and anchor line damage.

Water Quality and Resources

- 3.5 Increased amounts of housing or business development can lead to reduced water quality of rivers and estuarine environments. Sewage and industrial effluent discharges can contribute to increased nutrients on European designated sites leading to unfavourable conditions. In addition, diffuse pollution, partly from urban run-off has been identified during an Environment Agency Review of Consents process and a joint Environment Agency and Natural England evidence review, as being a major factor in causing unfavourable condition of European designated sites.
- 3.6 The quality of the water that feeds European designated sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:
- At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour. Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing available nitrogen;
 - Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life; and
 - Increased discharge of treated sewage effluent can result both in high levels of macroalgal growth, which can smother the mudflats of value to SPA birds and in greater scour (as a result of greater flow volumes).
- 3.7 At sewage treatment works, additional residential development increases the risk of effluent escape into aquatic environments in addition to consented discharges to the catchment. In many urban areas, sewage

¹⁷ Cole, D.N. 1995c. Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.

¹⁸ Cole, D.N., Spildie, D.R. 1998. Hiker, horse and llama trampling effects on native vegetation in Montana, USA. Journal of Environmental Management 53: 61-71

treatment and surface water drainage systems are combined, and therefore a predicted increase in flood and storm events could increase pollution risk.

Atmospheric Pollution (Atmospheric Nitrogen Deposition)

3.8 The main pollutants of concern for European designated sites are oxides of nitrogen (NO_x), ammonia (NH_3) and sulphur dioxide (SO_2). NO_x can have a directly toxic effect upon vegetation. In addition, greater NO_x or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats.

Table 3: Main sources and effects of air pollutants on habitats and species

Pollutant	Source	Effects on habitats and species
Acid deposition	SO_2 , NO_x and ammonia all contribute to acid deposition. Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, it is likely that increased nitrogen emissions may cancel out any gains produced by reduced sulphur levels.	Can affect habitats and species through both wet (acid rain) and dry deposition. Some sites will be more at risk than others depending on soil type, bed rock geology, weathering rate and buffering capacity.
Ammonia (NH_3)	Ammonia is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but levels have increased considerably with expansion in numbers of agricultural livestock. Ammonia reacts with acid pollutants such as the products of SO_2 and NO_x emissions to produce fine ammonium (NH_4^+) containing aerosol which may be transferred much longer distances (can therefore be a significant trans-boundary issue.)	Adverse effects are as a result of nitrogen deposition leading to eutrophication. As emissions mostly occur at ground level in the rural environment and NH_3 is rapidly deposited, some of the most acute problems of NH_3 deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides NO_x	Nitrogen oxides are mostly produced in combustion processes. About one quarter of the UK's emissions are from power stations.	Deposition of nitrogen compounds (nitrates (NO_3), nitrogen dioxide (NO_2) and nitric acid (HNO_3)) can lead to both soil and freshwater acidification. In addition, NO_x can cause eutrophication of soils and water. This alters the species composition of plant communities and can eliminate sensitive species.
Nitrogen deposition	(N) The pollutants that contribute to nitrogen deposition derive mainly from NO_x and NH_3 emissions. These pollutants cause acidification (see also acid deposition) as well as eutrophication.	Species-rich plant communities with relatively high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication, due to its promotion of competitive and invasive species which can respond readily to elevated levels of N. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O_3)	A secondary pollutant generated by photochemical reactions from NO_x and volatile organic compounds (VOCs). These are mainly released by the combustion of fossil fuels. The increase in combustion of fossil fuels in the UK has led to a large increase in background ozone concentration, leading to an increased number of days when levels across the region are above 40ppb. Reducing ozone pollution is believed to require action at international	Concentrations of O_3 above 40 ppb can be toxic to humans and wildlife, and can affect buildings. Increased ozone concentrations may lead to a reduction in growth of agricultural crops, decreased forest production and altered species composition in semi-natural plant communities.

level to reduce levels of the precursors that form ozone.

Sulphur Dioxide SO ₂	Main sources of SO ₂ emissions are electricity generation, industry and domestic fuel combustion. May also arise from shipping and increased atmospheric concentrations in busy ports. Total SO ₂ emissions have decreased substantially in the UK since the 1980s.	Wet and dry deposition of SO ₂ acidifies soils and freshwater, and alters the species composition of plant and associated animal communities. The significance of impacts depends on levels of deposition and the buffering capacity of soils.
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3.9 Sulphur dioxide emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil. Ammonia emissions are dominated by agriculture, with some chemical processes also making notable contributions. As such, it is unlikely that material increases in SO₂ or NH₃ emissions will be associated with Local Plans. NO_x emissions, however, are dominated by the output of vehicle exhausts. Within a 'typical' housing development, by far the largest contribution to NO_x (92%) will be made by the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison¹⁹. Emissions of NO_x could therefore be reasonably expected to increase as a result of greater vehicle use as an indirect effect of the Local Plan.

3.10 According to the World Health Organisation, the critical NO_x concentration (critical threshold) for the protection of vegetation is 30 µgm⁻³; the threshold for sulphur dioxide is 20 µgm⁻³. In addition, ecological studies have determined 'Critical Loads'²⁰ of atmospheric nitrogen deposition (that is, NO_x combined with ammonia NH₃) for key habitats within European designated sites.

Local Air Pollution

3.11 According to the Department of Transport's Transport Analysis Guidance, "Beyond 200 m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant"²¹.

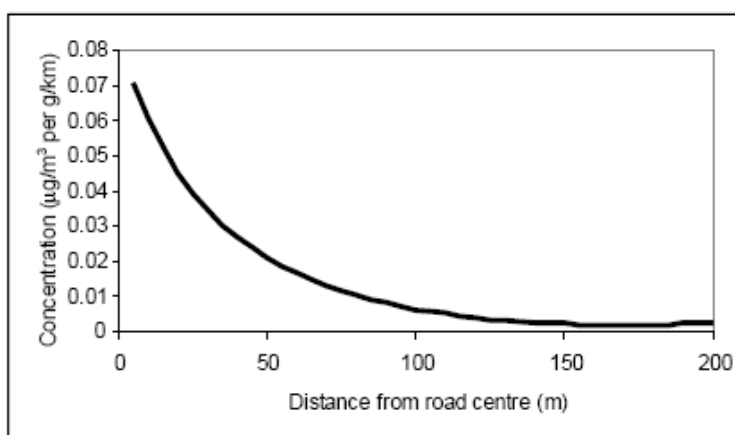


Plate 1. Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT)

3.12 This is therefore the distance that is used throughout the HRA process in order to determine whether a European site is likely to be significantly affected by development under a Plan.

¹⁹ Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php>

²⁰ The Critical Load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur

²¹ www.webtag.org.uk/archive/feb04/pdf/feb04-333.pdf

4. Test of Likely Significance

Introduction

- 4.1 The initial scoping of European designated sites illustrated in Table 1 identifies that some sites are potentially vulnerable to:
- Recreational pressure
 - Water resources and pollution
 - Air pollution
- 4.2 The full test of Likely Significant Effects for the Lewisham Local Plan is presented in Appendix B. The assessment took into consideration the above potential vulnerabilities of the European designated sites included in Table 1.
- 4.3 The following sections focus on Epping Forest SAC, Lee Valley SPA/Ramsar, Richmond Park SAC, Wimbledon Common SAC and Thames Estuary and Marshes SPA/Ramsar.

Summary of Test of Likely Significance ‘Alone’

- 4.4 No policies or site allocations within the Lewisham Local Plan are considered to have an effect on European designated sites ‘alone’.

Summary of Initial Test of Likely Significance ‘In Combination’

- 4.5 Of the 111 Local Plan policies, two policies, were considered to have the potential to result in a likely significant effect in combination:
- **HO 1 – Meeting Lewisham’s Housing Needs** – supports the development of housing within the borough over the plan period.
 - **EC 2 – Protecting Employment Sites and Delivering New Workspace** – supports the forecasted need for 21,800 sqm of employment floorspace.
- 4.6 In addition to the two policies which could potentially cause likely significant effects the site allocations within **Appendix C** also have the potential to cause likely significant effects in combination with other plans and projects.
- 4.7 All remaining policies are development management policies that do not provide impact pathways that could potentially link to European designated sites.
- 4.8 The potential for the above policies and site allocations will be discussed further within the ‘in combination’ section below related to each impact pathways in relation to the following European designated sites before the likely significant effect test is concluded.

Recreational Pressure

- 4.9 A visitor survey²² of the Epping Forest SAC concluded that the core recreational area, the area within which 75% of all visitors of the site reside, is a 6.2 km radius from the boundary of the site. An updated visitor survey has recently been completed which reaffirms the 6.2km core catchment. Within this core recreational area new residential developments have been deemed to cause a likely significant effect. The London Borough of Lewisham is over 9 km from the SAC and moreover, is south of the River Thames, which is likely a considerable barrier to regular recreational visits to the SAC. As the Borough is outside of the core recreational catchment of 6.2 km this impact pathway can be scoped out from further discussion within this

²² Footprint Ecology, 2018. Epping Forest Visitor Survey 2017. Footprint Ecology, Dorset.

HRA in relation to Epping Forest SAC as the impact pathway is not considered to cause a likely significant effect upon this European site even in combination with other plans and projects.

- 4.10 Lee Valley SPA/Ramsar is potentially vulnerable to recreational pressure depending on the effectiveness of existing site management. The part of the site closest to the London Borough of Lewisham (9 km north west) has recently changed (2017) from a system of key holder and permitted access only to a publicly open wetland reserve funded by the Walthamstow Wetlands Project. Although the SPA/ Ramsar is vulnerable to recreational pressure the Borough of Lewisham is over 9 km from the southernmost point of the SPA/Ramsar and in addition is south of the River Thames which is likely a considerable barrier to regular recreational visits to the SPA/Ramsar. In the majority in-land European designated sites have a recreational zone of influence of between 5.6 km (Thames Basin Heaths SAC/SPA) and 7.5 km (Breckland SAC/SPA) with only coastal sites extending to 10 km or more. At such a distance and with the Thames creating a barrier to regular recreational visits, it is likely that very few residents of Lewisham would visit the Lee Valley SPA/Ramsar. Indeed, looking at Visitor Survey results for Epping Forest SAC, which is only 3 km directly east of Lee Valley SPA/Ramsar, no visitors to the SAC came from any of South East London boroughs. This geographical pattern of visitation is highly likely to follow suit for Lee Valley SPA/Ramsar as well, and therefore this impact pathway can be scoped out from further discussion within this HRA in relation to Lee Valley SPA/Ramsar as the impact pathways is not considered to cause a likely significant effect upon this European Site.
- 4.11 Wimbledon Common and Richmond Park SACs are over 10 km and 12 km west, respectively, of the London Borough of Lewisham. As discussed above the majority of visitors are likely to only travel up to 7.5 km for regular visits to an SAC. In addition to this, the SACs both primarily designated for stag beetle (*Lucanus cervus*) which are not vulnerable to recreational pressure and only rely on a plentiful supply of partially buried dead wood, and therefore, this impact pathway can be scoped out from further discussion within this HRA in relation to Wimbledon Common SAC and Richmond Park SAC as the impact pathways is not considered to cause a likely significant effect upon this European Site.
- 4.12 The Thames Estuary and Marshes SPA/Ramsar site is located 26.4 km east (or 38.7 km downstream) of the London Borough of Lewisham. This was given preliminary consideration with regards to recreational pressure but is considered to be too far from the borough for Lewisham to form part of its core regular recreational catchment²³. Therefore, this impact pathway can be scoped out from further discussion within this HRA in relation to Thames Estuary and Marshes SPA/Ramsar as the impact pathway is not considered to cause a likely significant effect upon this European site.

Water Quality and Resources

- 4.13 With regards to water quality (water pollution) Lewisham is served by Crossness Sewage Treatment Works (STW) in the London Borough of Bexley. In addition to Lewisham, the STW also serves Bexley, Richmond Upon Thames, Wandsworth, Merton, Lambeth, Southwark, Greenwich and parts of Sutton and Bromley. The plant is located on the banks of the River Thames to the east of the London Borough of Lewisham. The outflow of treated water goes straight into the River Thames and thereafter flows south east to the Thames Estuary.
- 4.14 Both Epping Forest and Lee Valley are at least 9 km north west of the borough and Wimbledon Common and Richmond SAC are over 10 and 12 km west of the borough and all further from the outflow of treated sewerage and as the sewerage goes into the River Thames west of the European designated sites there is no link between development within the borough and either surface runoff or water pollution to these four European designated sites.
- 4.15 The Thames Estuary and Marshes SPA and Ramsar site is located 26.4 km east (or 38.7 km downstream) south east of the London Borough of Lewisham. This was given preliminary consideration with regards to wastewater impacts from London population growth, but Thames Water have invested extensively in infrastructure (such as expansions to Beckton, Mogden and Crossness Sewage Treatment Works, the Lee Tunnel and the Thames Tunnel) to ensure that water quality in the River Thames (and thus the SPA/Ramsar site downstream) improves notwithstanding the expected increase in the population of the catchment of STWs that discharge to the tidal river. In addition, the Site Improvement Plan (SIP) for the Greater Thames Complex²⁴ which includes the Thames Estuary and Marshes SPA does not list water pollution as a threat to

²³ The section of SPA/Ramsar site in Kent has been surveyed and a core catchment of 6km has been identified.

²⁴ <http://publications.naturalengland.org.uk/publication/6270737467834368> [Accessed 04/11/2019]

or pressure on the SPA. Therefore, the water quality impact pathway can be scoped out from further discussion within this HRA as the impact pathways is not considered to cause a likely significant effect upon any European designated sites.

- 4.16 London's water supply is mostly abstracted from the River Thames, west of London and stored in raw water reservoirs before being treated and put into supply; there is also a desalination plant on the north bank of the Thames at Beckton. Thames Water supplies the bulk of the water within London and through their Draft Water Resources Management Plan 2019, Thames Water sets out the ways in which they will continue to ensure the supply of water will meet demands, through increased abstraction, new pipelines, reservoirs or through transfers from other water resource zones. The increase in population of Lewisham in combination with the rest of the London supply area will increase the pressure on water supply and the plans made by Thames Water to ensure supply continues to keep up with increasing demand therefore have the potential to adversely affect European designated sites with a hydrological connection or within the proximity of the Thames Water Supply Option. However, the Habitats Regulations Assessment for Thames Water's Water Resources Management Plan 2019²⁵ concluded "*With the inclusion of the mitigation measures, Thames Water's revised draft WRMP19 has been assessed to have no adverse effects on the integrity of any European site, either alone or in-combination with other plans or projects.*" Therefore, water resources can be screened out of this HRA as the impact pathways are not considered to cause a likely significant effect upon any European designated sites.

Atmospheric Pollution (Atmospheric Nitrogen Deposition)

- 4.17 The only parts of the Lee Valley SPA/Ramsar within London are the Walthamstow Reservoirs. These are sealed reservoirs that are internationally designated for their populations of wintering gadwall and shoveler ducks. The Air Pollution Information System (APIS) website provides details of critical loads of atmospheric pollution which, if exceeded, could lead to habitat damage. However, no critical loads are provided for the habitat - open standing water – on which the bird species forming the reason for the international designation rely. The APIS website states that '*No Critical Load has been assigned to the EUNIS classes for meso/eutrophic systems. These systems are often phosphorus limited; therefore, decisions should be taken at a site-specific level*'. In this case, no likely significant effects are anticipated since the Lee Valley SPA/Ramsar, like most freshwater environments, is phosphate limited, rather than nitrogen limited, meaning that it is phosphate availability that controls the growth of macrophytes and algae. In addition to this the Office for National Statistics website²⁶ does not indicate that any residents of Lewisham commute to Walthamstow for work either driving a car or van or as a passenger in a car or van.
- 4.18 Epping Forest SAC is known to be adversely affected by relatively poor local air quality alongside roads that traverse the parts of the site that lie in Epping Forest District and this has been demonstrated to have negatively affected the epiphytic lichen communities of the woodland as well as other features. The nature of the road network around Epping Forest is such that journeys between a number of key settlements around the forest by car, van or bus effectively necessitate traversing the SAC. However, in contrast to authorities located closer to the SAC data indicates that no daily journeys to work arising in the London Borough of Lewisham necessitate traversing Epping Forest SAC. This is illustrated by examination of 2011 census data from the Office of National Statistics.
- 4.19 The A3 and A219 are within 200 m of Wimbledon Common SAC and a small section of the A3, the B353 and the A308 are within 200 m of Richmond Park SAC. However, Lewisham is over 10 km and 12 km from these SACs and the 2011 census data from the Office of National Statistics does not show any daily journeys to work to either the Richmond on Thames or Merton Boroughs in which the SACs reside. In addition, the primary designation for the SACs is stag beetle which is not vulnerable to a reduction on air quality, as it relies on a plentiful supply or partially buried dead wood.
- 4.20 There are also overarching measures to improve London's air quality being undertaken by the Mayor of London. The HRA of the London Plan²⁷ states that, "*the Mayor has been producing a number of other strategies including several that are intended to improve air quality and reduce NO_x and other emissions*

²⁵ <https://corporate.thameswater.co.uk/-/media/Site-Content/Your-water-future-2018/Appendices/dWRMP19-Appendix-C---HRA---Stage-1-screening-151217.pdf> [Accessed 17/13/2019]

²⁶ <https://www.nomisweb.co.uk/census/2011/WU03UK/chart/1132462387> [Accessed 17/12/19]

²⁷ Draft London Plan Habitats Regulations Assessment Update. July 2018. AECOM for Greater London Authority.

over the London Plan period and beyond". These include the London Environment Strategy and the Mayor's Transport Strategy. Among the actions in the Mayor's Transport Strategy over the duration of the London Plan period up to 2030, include but are not limited to; zero emission capable taxis, town centre Zero Emission Zones, electric single-deck buses and bus charging infrastructure, supporting low emission freight, deliver of 2000 electric vehicle charging points, further investment in charging and refuelling infrastructure, and an Extended Ultra Low Emission Zone.

- 4.21 As a result of these initiatives, the Mayor's Transport Strategy Supporting Evidence Outcomes Summary Report²⁸ concludes that '*... with the actions identified in this strategy, a sustainable mode share of 80 per cent can be achieved, meaning that eight in ten journeys made in London will be made on foot, by bicycle or by public transport and just two in ten by car, taxi, private hire vehicle or motorcycle*' and that '*Traffic reduction and improvements in vehicle technology will deliver large scale reductions of 94 percent in NOx*'. In light of the evidence considered above, it is concluded that the Lewisham Local Plan will not result in likely significant effects via negative changes in air quality on the Lee Valley SPA/Ramsar or Epping Forest SAC, Wimbledon Common SAC or Richmond Park SAC.

²⁸ <https://tfl.gov.uk/corporate/publications-and-reports/travel-in-london-reports?intcmp=3120> [accessed 27/10/2017]

5. Conclusions

- 5.1 This assessment undertook both screening of the policies and allocations within the London Borough of Lewisham Local Plan
- 5.2 The European designated sites, considered within the screening for impact pathways with a potential likely significant effect were:
- Epping Forest SAC;
 - Lee Valley SPA and Ramsar;
 - Wimbledon Common SAC;
 - Richmond Park SAC; and,
 - Thames Estuary and Marshes SPA and Ramsar.
- 5.3 Impact pathway considered were:
- Recreational Pressure;
 - Water Quality and Resources; and,
 - Air Quality.
- 5.4 There are policies within the Lewisham Local Plan that refer to the provision of housing or new employment space, development and expansion of the Bakerloo Line. An increase in net new dwellings within the Borough has the potential to increase the recreational pressure upon European designated sites, which are vulnerable to this impact pathway where the accommodation is built in its catchment area. Net new housing and employment can also increase the issues on European designated sites with regards to air quality. An increase in net new dwellings also has the potential to put pressure on water resources and increase the release of effluent into the River Thames which could affect downstream European designated sites.
- 5.5 However, the London Borough of Lewisham is not within the core recreational catchment of any of the closest European designated sites. All sites are over 9 km from the borough boundary and therefore likely further from the nearest development. For boroughs outside of the recreational catchments the number of visits from residents is *de minimis* and therefore would not lead to an adverse effect even in combination and so recreational pressure was screened out for all European designated sites.
- 5.6 A reduction in air quality was also screened out as not causing an adverse effect as census data from the Office of National Statistics shows that no daily commutes from Lewisham go to any of the boroughs within which the SAC's and SPA/Ramsar are situated. In addition, although there are major commuting routes within 200 m of the SAC's and SPA/Ramsar the primary reason for designation is either not within 200 m of the road (Epping Forest SAC) or not vulnerable to a reduction in air quality (Wimbledon Common SAC, Richmond Park SAC, Lee Valley SPA/Ramsar) and therefore would not lead to a significant adverse effect, ensuing that air quality could be screened out for all European designated sites.
- 5.7 Similarly, water resources and water quality were also screened out for all European designated sites. In terms of water quality, all sites are over 9 km distant from the borough boundary and upstream of the borough. The only site downstream of the borough is the Thames Estuary and Marshes which was approximately 38 km downstream. Thames Water have invested extensively in infrastructure (such as expansions to Beckton, Mogden and Crossness Sewage Treatment Works, the Lee Tunnel and the Thames Tunnel) to ensure that water quality in the River Thames (and thus the SPA/Ramsar site downstream) improves notwithstanding the expected increase in the population of the catchment of STW that discharge to the tidal river. With regard to resources Thames Waters Draft WRMP 2019, which sets out ways in which they will meet demand with increased pressure on water resources from an increasing population across the whole of London and the Thames catchment, concluded that the measures that will be employed to keep up with this demand will not adversely affect any European designated sites.
- 5.8 Therefore, it can be concluded that the Lewisham Local Plan will not result in a likely significant effect on any European designated sites either alone or in combination.**

Appendix A European Site Background Information

Epping Forest SAC

Introduction

Epping forest is a 2,400 ha area of Ancient woodland between Epping in Essex to the north and Forest Gate in Greater London to the south, straddling the border between London and Essex. It is a former Royal Forest. Epping Forest represents Atlantic acidophilous beech forest in the north-eastern part of the habitat's UK range. The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates. The site also has areas of heathland.

Conservation Objectives²⁹

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Qualifying Features³⁰

Annex I habitats that are a primary reason for selection of this site:

- Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion robur-petraeae* or *Ilici-Fagenion*)

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site

- Northern Atlantic wet heaths with *Erica tetralix*
- European dry heaths.

Annex II species that are a primary reason for selection of this site

- Stag beetle *Lucanus cervus*

Environmental Vulnerabilities³¹

- Air pollution: impact of atmospheric nitrogen deposition
- Undergrazing
- Public access / disturbance
- Changes in species distribution
- Inappropriate water levels
- Water pollution
- Invasive species
- Disease

²⁹ <http://publications.naturalengland.org.uk/publication/5908284745711616> [Accessed 30/10/2019]

³⁰ <https://sac.jncc.gov.uk/site/UK0012720> [Accessed 30/10/2019]

³¹ <http://publications.naturalengland.org.uk/publication/6663446854631424> [Accessed 30/10/2019]

Lee Valley SPA/Ramsar

Introduction

The Lee Valley SPA comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that display a range of man-made and semi-natural wetland and valley bottom habitats.

Conservation Objectives³²

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Qualifying Features³³³⁴

The SPA qualifies under article 4.1 of the Directive (79/409/EEC) as it is used regularly by 1% or more of the Great Britain population of a species listed on Annex 1 in any season:

- Bittern *Botaurus stellaris* – 6 individuals (wintering) – 5 year peak mean 1992/93 – 1996/97 which is 6% of the GB over wintering population.

The SPA qualifies under article 4.2 of the Directive (79/409/EEC) as it is used regularly by 1% or more of the biogeographical populations of the following regularly occurring migratory species (other than those listed on Annex 1), in any season:

- Shoveller *Anas clypeata* – 406 individuals (wintering) – 5 year peak mean 1993/94 – 1997/98 which is 1% of the NW/Central Europe overwintering population.
- Gadwall *Anas strepera* – 456 individuals (wintering) - 5 year peak mean 1993/94 – 1997/98 which is 1.5% of the NW Europe over wintering population.

Non Qualifying species of interest: In addition, the site supports nationally important numbers of Cormorant *Phalacrocorax carbo*, great crested grebe *Podiceps cristatus*, tufted duck *Aythya fuligula*, Porchard *Aythya ferina* and grey heron *Ardea cinerea*.

The Ramsar qualifies for the following criteria:

Criterion 2

The site supports nationally scarce plan species whorled water-milfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman)

Criterion 6

Qualifying species populations (as identified at designation):

Species with peak counts in spring/autumn:

³² <http://publications.naturalengland.org.uk/publication/5670650798669824> [Accessed 30/10/2019]

³³ <http://archive.jncc.gov.uk/pdf/SPA/UK9012111.pdf> [Access 30/10/2019]

³⁴ <http://archive.jncc.gov.uk/pdf/RIS/UK11034.pdf> [Access 30/10/2019]

- Northern shoveller – 287 individuals representing an average of 1.9% of the GB population (5 year peak mean 1998/99 – 2002/03)

Species with peak counts in winter:

- Gadwall – 445 individuals representing an average of 2.6% of the GB population (5 year peak mean 1998/99 – 2002/03)

Environmental Vulnerabilities³⁵

- Water pollution
- Hydrological changes
- Public access/ disturbance
- Inappropriate scrub control
- Fisheries: fish stocking
- Invasive species
- Inappropriate cutting/ mowing
- Air pollution: risk of atmospheric nitrogen deposition

Wimbledon Common SAC

Introduction

Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for Stag beetle and the site is recognised as being important for this species. Management of the site is focussed on maintaining appropriate habitat conditions and there are no indications that the species is under threat on a local scale but there are concerns about the conservation of stag beetle in a wider context. Wimbledon Common also supports examples of Northern Atlantic wet heaths and European dry heaths but these are not primary reasons for selection of the site as SAC

Conservation Objectives³⁶

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Qualifying Features³⁷

Annex I habitats present as qualifying features, but not a primary reason for selection of this site:

- Northern Atlantic wet heaths with *Erica tetralix*

³⁵ <http://publications.naturalengland.org.uk/publication/5864999960444928> [Accessed 30/10/19]

³⁶ <http://publications.naturalengland.org.uk/publication/5706571287887872> [Accessed 09/12/19]

³⁷ <https://sac.incc.gov.uk/site/UK0030301> [Accessed 09/12/19]

- European dry heaths

Annex II species that are a primary reason for selection of this site

- Stag beetle *Lucanus cervus*

Environmental Vulnerabilities³⁸

- Public access / disturbance
- Habitat fragmentation
- Invasive species
- Air pollution: impact of atmospheric nitrogen deposition

Richmond Park SAC

Introduction

Richmond Park SAC is a parkland site covering 847ha. It has been managed as a royal deer park since the 17th century and continues to be managed as one of London's Royal Parks. It is significant for its dry acid grassland and neutral unimproved grassland mosaic, extensive wooded areas and an impressive population of veteran trees. These habitats support a rich invertebrate assemblage; in the case of the woodland and veteran trees this relates to saproxylic invertebrates, particularly Stag Beetles, for which the SAC is designated.

Conservation Objectives³⁹

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of the habitats of qualifying species
- The structure and function of the habitats of qualifying species
- The supporting processes on which the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Qualifying Features⁴⁰

Annex II species that are a primary reason for selection of this site

- Stag beetle *Lucanus cervus*

Environmental Vulnerabilities⁴¹

No current issues affecting the Natura 2000 features have been identified on this site. Richmond Park Management Plan should continue to be periodically reviewed to ensure the continuing availability of decaying wood habitat.

³⁸ <http://publications.naturalengland.org.uk/publication/5638512552443904> [Accessed 09/12/19]

³⁹ <http://publications.naturalengland.org.uk/publication/5279688851193856> [Accessed 09/12/19]

⁴⁰ <https://sac.jncc.gov.uk/site/UK0030246> [Accessed 09/12/19]

⁴¹ <http://publications.naturalengland.org.uk/publication/6625232836100096> [Accessed 09/12/2019]

Thames Estuary and Marshes SPA/Ramsar

Introduction

The Thames Estuary and Marshes SPA is located on the south side of the Thames Estuary in southern England. The marshes extend for about 15 km along the south side of the estuary and also include intertidal areas on the north side of the estuary. To the south of the river, much of the area is brackish grazing marsh, although some of this has been converted to arable use. At Cliffe, there are flooded clay and chalk pits, some of which have been infilled with dredgings. Outside the sea wall, there is a small extent of saltmarsh and broad intertidal mud-flats. The estuary and adjacent grazing marsh areas support an important assemblage of wintering waterbirds including grebes, geese, ducks and waders. The site is also important in spring and autumn migration periods.

Conservation Objectives⁴²

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Qualifying Features⁴³⁴⁴

With regards to the SPA:

This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

Over winter:

- Avocet *Recurvirostra avosetta*, 276 individuals representing at least 21.7% of the wintering population in Great Britain (5 year peak mean 1991/92 – 1995/96)
- Hen harrier *Circus cyaneus*, 7 individuals representing at least 0.9% of the wintering population in Great Britain (5 year mean 1993/94 – 1997/98)

This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:

On passage:

- Ringed plover *Charadrius hiaticula*, 559 individuals representing at least 1.1% of the Europe/North Africa – wintering population (5 year peak mean 1991/92 – 1995/96)

Over winter:

- Ringed plover *Charadrius hiaticula*, 541 individuals representing at least 1.1% of the wintering Europe/North Africa – wintering population (5 year peak mean 1991/92 – 1995/96)

Assemblage qualification: A wetland of international importance

⁴² <http://publications.naturalengland.org.uk/publication/4698344811134976> [Accessed 08/11/19]

⁴³ <http://archive.jncc.gov.uk/default.aspx?page=2042> [Accessed 08/11/19]

⁴⁴ <http://archive.jncc.gov.uk/pdf/RIS/UK11069.pdf> [Accessed 08/11/19]

The area qualifies under Article 4.2 of the Directives (79/409/EEC) by regularly supporting at least 20,000 waterfowl.

Over winter the area regularly supports 33,433 individual waterfowl (5 year peak mean 1991/92 – 1995/96) including:

- Redshank *Tringa totanus*, Black-tailed Godwit *Limosa limosa islandica*, Dunlin *Calidris alpina alpina*, Lapwing *Vanellus vanellus*, Grey Plover *Pluvialis squatarola*, Shoveler *Anas clypeata*, Pintail *Anas acuta*, Gadwall *Anas strepera*, Shelduck *Tadorna tadorna*, White-fronted Goose *Anser albifrons albifrons*, Little Grebe *Tachybaptus ruficollis*, Ringed Plover *Charadrius hiaticula*, Avocet *Recurvirostra avosetta*, Whimbrel *Numenius phaeopus*.

The Ramsar qualifies for the following criteria:

Criterion 2

The site supports one endangered plant species and at least 14 nationally scarce plants of wetland habitats. The site also supports more than 20 British Red Data Book invertebrates.

Criterion 5

Assemblages of international importance:

Species with peak counts in winter:

- 45,118 waterfowl (5 year peak mean 1998/99 – 2002/03)

Criterion 6

Species/populations occurring at levels of international importance

Qualifying species/populations (as identified at designation:

Species with peak counts in spring/autumn:

- Ringed plover, *Charadrius hiaticula*. 595 individuals, representing an average of 1.8% of the GB population (5 year peak mean 1998/99 – 2002/03)
- Black-tailed godwit, *Limosa limosa islandica*. 1640 individuals, representing an average of 4.6% of the population (5 year peak mean 1998/99 – 2002/03)

Species with peak counts in winter:

- Grey plover, *Pluvialis squatarola*. 1643 individuals, representing an average of 3.1% of the GB population (5 year peak mean 1998/99 – 2002/03)
- Red knot, *Calidris canutus islandica*. 7279 individuals, representing an average of 1.6% of the GB population (5 year peak mean 1998/99 – 2002/03)
- Dunlin, *Calidris alpina alpina*. 15171 individuals, representing an average of 1.1% of the population (5 year peak mean 1998/99 – 2002/03)
- Common redshank *Tringa totanus totanus*. 1178 individuals, representing an average of 1% of the GB population (5 year peak mean 1998/99 – 2002/03)

Environmental Vulnerabilities⁴⁵

The site improvement plan for this SPA also covers several other SPAs. The Greater Thames Complex consists of the Thames Estuary and Marshes SPA, the Medway Estuary SPA, the Swale SPA and Benfleet & Southend Marshes SPA.

- Coastal squeeze

⁴⁵ <http://publications.naturalengland.org.uk/publication/6270737467834368> [Accessed 08/11/19]

- Public access/ disturbance
- Invasive species
- Change in species distributions
- Fisheries: Commercial marine and estuarine
- Invasive species
- Vehicles: illicit
- Air pollution: risk of atmospheric nitrogen deposition

Appendix B Policy Screening: Likely Significant Effects

IPolicy	Description	Likely Significant Effects
Policy OL 1 – Delivering an Open Lewisham (Spatial Strategy)	A. The Council will work positively and alongside local communities, community groups, and other public and private sector stakeholders to realise the Vision for Lewisham and to address the strategic objective for ‘An Open Lewisham as part of an Open London’. Good Growth will be delivered in the Borough by: a) Directing new development to Growth Nodes, Regeneration Nodes and well-connected sites, including in Lewisham’s Opportunity Areas of New Cross / Lewisham / Catford and Deptford Creek / Greenwich Riverside, and carefully managing growth in these locations in response to local character 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 the environmental, social and economic barriers that affect the lives of people in these areas, and ensure equality of opportunity; c) Directing new residential, commercial, community, leisure and cultural development to Lewisham’s town and local centres in order to support their vitality, viability and long-term resilience, and through this process: i) Enable Lewisham Major Centre to cement its position as a centre of sub-regional significance and be designated as a Metropolitan Centre in a future review of the London Plan; ii) Facilitate the comprehensive regeneration of Catford Major Centre to reinforce its role as the principal civic and cultural hub within the Borough; and iii) Ensure the District Centres at Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross and Sydenham retain their distinctive -character whilst evolving in their function as key hubs of community, cultural and commercial activity; d) Directing new development along the A21 Corridor and other strategic Growth Corridors to support growth, along with using the Healthy Streets Approach to enhance the quality of places and improve connections within and between neighbourhoods;	No HRA Implications. This policy sets out a plan for the regeneration of Lewisham Borough. Although the policy does talk about directing new residential, commercial, community, leisure, and cultural development to Lewisham’s town and local centres. It does not allocate sites or a quantum of housing within this specific policy.

IPolicy	Description	Likely Significant Effects
	e) Securing the delivery of new and improved infrastructure as a catalyst for investment and to unlock the development potential of sites across the Borough. The delivery of the Bakerloo line extension will both support and enable growth in Opportunity Areas and Lewisham's southern areas, including Bell Green and Lower Sydenham; f) Making the best use of land and space by prioritising the redevelopment of brownfield land of low or negligible ecological value and enabling the sensitive intensification of established residential neighbourhoods and commercial areas, including through the development of small sites; g) Ensuring all new development proposals follow the design-led approach to make the optimal use of land, respond positively to local distinctiveness (including the historic, cultural, natural and built environment), and helps to secure inclusive, safe, liveable, walkable and healthy 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 by walking and cycling; i) Ensuring that a strategic and coordinated approach is taken by the Council and its partners to respond to the climate emergency and requiring new development to integrate measures for climate change adaptation and mitigation.	
Policy QD 1 – Delivering high quality design in Lewisham	A. 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. Development proposals must demonstrate an understanding of the site context and respond positively to Lewisham's local distinctiveness by providing for buildings, spaces and places that reinforce and enhance local character. This includes the special and	No HRA Implications. This policy regards design principals which developers much aspire to during the development process.

IPolicy	Description	Likely Significant Effects
	distinctive visual, historical, environmental, social and functional qualities of places that contribute to local character, identity, sense of community and belonging. C. To successfully respond to local distinctiveness development proposals 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) within the site, its immediate vicinity 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; h. Architectural styles, detailing and materials that contribute to local character; and i. Cultural assets. Places for People D. Development proposals must put people at the centre of the design-led approach, ensuring buildings and spaces are welcoming, inclusive, safe and accessible to people of all backgrounds, ages and abilities. Development should be designed and built to a human scale by responding to the ways in which people move through, engage with and experience their surroundings. E. Development proposals must be designed to facilitate good physical and mental health, support the wellbeing of the population and foster community cohesion by providing: a) Buildings and spaces that are inclusive, intuitive to use, comfortable, safe and secure;	

IPolicy	Description	Likely Significant Effects
	b) A high quality public realm that maintains and wherever possible enhances access to green and open spaces; c) Positive and active frontages that generate visual interest and which have a positive relationship with the public realm, particularly at the street-level; d) Well-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. Well-functioning and resilient places F. Development proposals must be well-integrated within their neighbourhood. They must provide a positive and coherent relationship with all land uses and spaces within the site and its surroundings having regard to: a) The compatibility of land-uses and activities within and surrounding the development; b) The need to ensure that neighbourhoods are well-connected both 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. G. Development must be appropriately supported by infrastructure. Development proposals 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. H. Development proposals must be designed to mitigate climate change and integrate adaptation measures to make neighbourhoods and properties more resilient to its impacts, including by maximising opportunities for urban greening, with reference to other Local Plan policies.	

IPolicy	Description	Likely Significant Effects
	Delivering high quality development I. Development proposals must include a Design and Access Statement to demonstrate how the design-led approach has been applied to deliver high quality development. 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. 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. 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.	
QD2 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, as well as to feel safe in their surroundings wherever they are. Development proposals 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: a) Ensuring buildings and spaces are designed to be entered, used and exited safely, easily and with dignity for all;	No HRA Implications This policy regards the design principals for accessible and safe homes.

IPolicy	Description	Likely Significant Effects
	b) Ensuring buildings and spaces are designed to be inclusive to all 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 QD3 (Public realm and connecting places); and e) Applying 'Secured by Design' principles. C. Where development proposals incorporate perimeter or 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, these 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 varied requirements of Lewisham's resident population development proposals incorporating new residential units must ensure that: E. At least 10 per cent of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings'; and F. All other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. G. 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. H. Where development proposals for housing include provision of communal private amenity space or facilities this should be designed and appropriately managed in a way that allows for access by all residents occupying the development, regardless of tenure.	

IPolicy	Description	Likely Significant Effects
	Adapting historic buildings and other heritage assets I. 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.	
QD 3 Public Realm and Connecting Places	A. Development proposals must use the design-led approach to secure a high quality public realm. They must respond positively to the role of the public realm in contributing to local distinctiveness and supporting inclusive, safe, accessible, attractive and well-connected places and spaces. B. Development proposals must respond positively to the 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. Proposals must ensure that the public realm provide for coherent relationships with surrounding buildings and land-uses, and good connections within and between neighbourhoods. C. Development proposals must address legibility and permeability of the public realm, both within a site as well as its immediate and wider surroundings, taking account of the movement patterns and desire lines of people within 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. D. Development proposals must investigate and maximise opportunities to enhance the public realm. They should seek to: a) Improve connections to existing or planned transport and community infrastructure, including open space; b) Make provision for cycle parking infrastructure and bus stops;	No HRA Implications. This policy regards design principles for developers within the public realm of a development.

IPolicy	Description	Likely Significant Effects
	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; d) Integrate wider pavements, or widen pavements where these already exist; e) Avoid or remove barriers that unnecessarily impede or restrict movement and accessibility, and adversely impact on public safety; and f) Integrate trees and other urban greening measures. E. 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. 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. 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. 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;	

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	g) Formal and informal play space, addressing the needs of people of different ages and abilities; G. 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. Public realm should be sustainability designed and constructed, including by maximising opportunities for urban greening and mitigating the impacts of climate change, with reference to other Local Plan policies. 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. 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. 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: - Responds positively to the site context and local character, including historic character and the significance of heritage assets; - Enhances the legibility of the public realm; and - Does not adversely impact on amenity. K. 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. Effectively managing the public realm L. Development proposals 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 managed in the same manner as public space,	

IPolicy	Description	Likely Significant Effects
	ensuring the space is inclusive and access 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.	
Policy QD 4 – Building Heights	A. Tall buildings are substantially taller than their surroundings and cause a significant change to the skyline. 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: 1. 80.8 meters (25 storeys) to 151.2 meters (48 storeys) in Deptford / North Deptford 2. 52.0meters (16 storeys) to 112.8 meters (35 storeys) in Lewisham Town Centre 3. 39.2 meters (12 storeys) to 64.8 meters (20 storeys) in Catford 4. 64.8 meters (20 storeys) to 96.8m in Deptford Creekside 5. 32.8 meters (10 storeys) to 48.8 meters (15 storeys) in New Cross and New Cross Gate 6. 32.8 meters (10 storeys) to 39.2 meters (12 storeys) in Bellingham and Lee Green. 7. 39.2 meters (12 storeys) to 52.0 meters (16 storeys) in Lower Sydenham / Bell Green proposed opportunity area D. Development proposals for tall buildings will 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: 1. Will contribute to delivery of, and is not at odds with, the spatial strategy for the Borough; 2. Is of an exceptionally good design and architectural quality; 3. Is sensitive to the site's immediate and wider context 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);	No HRA Implications This policy regards design principals of building heights and protection of significant views throughout the borough.

IPolicy	Description	Likely Significant Effects
	4. Will not result in any unacceptable adverse visual, functional, environmental and cumulative impacts, with reference to the requirements of London Plan policy D9 (Tall Buildings); 5. Will make a positive contribution to the townscape and skyline; 6. Will not adversely impact on strategic and local views, vistas and landmarks, including strategic background views, with reference to Policy QD5 (View management); 7. Will preserve or enhance the significance of heritage assets and their setting; and 8. 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, 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).	
Policy QD 5 – View Management	A. Strategic views include significant buildings, urban landscapes and riverscapes. There are a number of strategic views 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 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 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 landmark elements.	No HRA Implications This policy regards protecting strategic views throughout the borough as well as ensuring designated local landmarks are safeguarded to keep Lewisham's distinctiveness.

IPolicy	Description	Likely Significant Effects
	Development proposals should also seek to preserve or where possible enhance a 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: - The need to ensure there is no detrimental impact on the foreground, middle ground and background of the designated view; and - Compliance with the principles and policies for managing views set out in London Plan Policies HC3 (Strategic and Local Views) and HC4 (London View Management Framework). E. Development proposals should use the design-led approach 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.	
Policy QD 6 – Optimising site capacity	A. Development proposals must use the design-led approach to make the best use of land and optimise the capacity of a site, with reference to Policy QD1 (Delivering high quality design in Lewisham). B. To establish the optimum capacity of a site consideration must be given to the appropriate development density having regard to: - The type and nature of uses proposed; - The site context, with reference to the site's immediate and surrounding area, taking into account: - Location setting; - Local distinctiveness and character, including heritage assets, with consideration given to the prevailing and/or emerging form and proportion of development in the area; - Public Transport Access Levels, taking into account current levels and future levels expected to be achieved by the delivery of planned public transport infrastructure; and - Capacity of infrastructure to support the land uses and density proposed, having regard to the individual and cumulative impacts of development.	No HRA Implications This policy regards design management principals of housing density to ensure optimum density for the site, level of local transport and capacity of other infrastructure.

IPolicy	Description	Likely Significant Effects
	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.	
Policy QD 7 – Amenity and Agent of Change	A. Development proposals must clearly demonstrate how noise and other nuisances will be mitigated and managed. B. Development proposals must comply with the Agent of Change principle in accordance with the London Plan. C. Development proposals must use the design-led approach 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. Appropriate provision of privacy is made, ensuring development does not result in unreasonable levels of overlooking; b. Adequate provision for outlook, and demonstrate how this has been optimised; c. Adequate levels of ventilation, daylight, sunlight and open aspects including provision of private amenity space where appropriate; 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. f. Development does not prejudice the use of playing fields. D. Noise Impact Assessment and/or Vibration Impact Assessment must be submitted with applications for developments likely to involve a significant noise or vibration generating use. Artificial lighting E. Development proposals must be designed to mitigate and manage light pollution by ensuring that lighting is:	No HRA Implications This policy regards the design management of developments in terms of protecting and improving current and future users of the development and local area.

IPolicy	Description	Likely Significant Effects
	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. G. Development proposals should seek opportunities to enhance the function, safety and appearance of the public realm through sensitively integrated external lighting, where appropriate, having regard to (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. 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.	
Policy QD 8 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 development proposals for housing must ensure provision for adequately-sized rooms and living spaces, comfortable and functional layouts and well-integrated amenities. This includes development proposals for new-build housing, changes of use, alterations and extensions. B. Development proposals for housing 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;	No HRA Implications This policy is a design management policy which requires that quality design is upheld in the developments by the developers to ensure that the housing stock meets the needs of the residence over their lifetimes.

IPolicy	Description	Likely Significant Effects
	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 housing must address the qualitative design aspects set out in the London Plan Policy D6 (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 housing must be designed to be inclusive, accessible and safe to all, with reference to Policy QD2 (Inclusive and safe design). E. Development proposals for housing 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. F. Development proposals for housing 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 housing must maximise the provision of dual aspect dwellings. Proposals for single aspect dwellings, particularly north facing dwellings will be resisted and only be permitted where it can be suitably demonstrated that	

IPolicy	Description	Likely Significant Effects
	the development will provide a more appropriate design solution than a dual aspect dwelling, having particular regard to: - Site or building size, layout and orientation; - Outlook for occupiers; - Microclimate management including for heating, cooling and ventilation; and - Amenity including adequate privacy and protection against exposure to odour, noise, light and air pollution.	
Policy QD 9 – Building Alterations, Extensions and Basement Development	- Development proposals for building alterations, extensions and basements must be designed to a high quality standard and have regard to the Council's Alterations and Extensions SPD. - Development proposals for building alterations and extensions will only be supported where they: - Respect and complement the form, proportion, setting, period, architectural characteristics and detailing of the original building and the site; - Use high quality, durable and matching or complementary materials; - 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 - Do not adversely impact on, or result in the loss of, the amenity of neighbouring properties, including back gardens. - Innovative and contemporary designs will only be supported where they are of an exceptional design quality and comply with (B) above. - Roof extensions on the street frontage of a building, particularly within predominately 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 rational, a design opinions appraisal has been undertaken that demonstrates an	No HRA Implications This is a design management policy which specifies criteria for suitably designed extensions and alterations to existing residential stock.

IPolicy	Description	Likely Significant Effects
	extension to the rear of the building is not feasible or appropriate, and other policies are satisfied. E. Residential extensions should retain an accessible and functional private garden area which is appropriate in size in relation to building and the intended number of occupants of the dwelling. Development proposals should seek to retain 50% of the original garden area. F. New units or rooms created by a residential alteration or extension must ensure adequate living and amenity space for all intended occupiers. Basement development G. Proposals for basement development must include a Basement Impact Assessment. H. Basement development will only be permitted where it can be suitably demonstrated that the development: - 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; - Will not adversely impact on the structural stability of the host building, neighbouring properties, infrastructure and the public realm, taking into account local geology; - Will not result an increase to flood risk whilst ensuring users of the development will be safe from all sources of flooding. - Will not adversely impact on the natural environment; and - Will not adversely impact on the amenity of neighbouring properties on occupation and use, and minimise impacts on amenity during construction. I. Proposals for residential basement development extending beneath the garden area must demonstrate that: - There will be no loss of or harm to trees of value, including amenity and townscape value,; and	

IPolicy	Description	Likely Significant Effects
	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 housing, or other sensitive uses, must ensure safe access and egress for all likely users of the development. 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. Light wells L. Development proposals for light wells must respect the architectural and historical character of the host building and its wider setting, and not adversely impact on the amenity of neighbouring properties. Light wells should be sensitively integrated and designed to avoid the loss of amenity space, including garden land. Proposals that will result in an excessive or harmful loss of amenity space will be resisted.	
Policy QD 10 – Infill and Backland sites, Garden land and Amenity areas	A. Development proposals on infill and backland sites, garden land (including back gardens) and amenity areas will only be acceptable where: - The use is appropriate to the site and will not result in an unreasonable adverse impact on the amenity of neighbouring land uses and properties, including their rear gardens; - The requirements for Neighbourhood Open Space are adequately addressed, where relevant, with reference to Policy GR3 (Open Space); and - The development has a clear urban design rationale, having regard to the Council's Small Sites SPD. B. Where the requirements of (A) above are satisfied, development proposals must: - Be of a high quality design and respond positively to the site context and local character, including historical character;	No HRA Implications This is a design management policy which regards criteria for the suitable design of backland and infill development. It does not allocate a quantum of development.

IPolicy	Description	Likely Significant Effects
	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 GR5 (Urban Greening and Trees); d. Ensure safe and convenient access for all users of the development; e. Make adequate arrangements for servicing the building and site. Infill sites 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 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 D. Development proposals on backland sites will only be supported where they: do not introduce gates or other design features that unnecessarily restrict or prevent public access to or through the site. Garden land (including back gardens) 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. F. Development proposals that will result in the loss of garden land, including private back gardens, will be strongly resisted. This includes the development of back	

IPolicy	Description	Likely Significant Effects
	gardens for separate dwellings in perimeter forms of housing. The loss of garden land will only be considered acceptable in exceptional circumstances where: - The proposal is for comprehensive redevelopment of a number of whole land plots; and - The requirements of (A) and (B) above are satisfied. Amenity areas - Development proposals on amenity areas of landscaped open space adjoining existing residential buildings will only be supported where they: - Repair, reinstate or re-provide active street frontages; - Retain existing private garden space; and - Apply inclusive and safe design principles, and seek opportunities to enhance natural surveillance.	
Policy QD 11 – Shopfronts	- Shopfronts (including their signs, canopies and security installations) must be designed to a high quality standard. Development proposals for shopfronts will only be supported where they do not adversely impact on local character, amenity and public safety. - Development proposals for new shopfronts or alterations to existing shopfronts must: - Retain, refurbish or reinstate shopfronts, or associated elements of architectural interest where these contribute to the distinctive visual or historic character of a building, townscape or area; - Be of a proportion, scale and quality that responds to the character of the host building and, where relevant, adjoining properties; - Use high quality materials and colours that are sensitive to local character; and - Retain or provide glazed shop windows. - Within Conservation Areas and residential areas, internally illuminated box fascia signs and projecting signs will not be permitted unless they successfully relate to	No HRA Implication This policy regards design management of any shop front within development proposals to ensure enhancement of Lewisham's neighbourhoods.

IPolicy	Description	Likely Significant Effects
	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. E. Development proposals for shopfront canopies that are fixed in the 'down' position will be resisted. Retractable canopies may be acceptable where they are designed to provide sufficient clearance. 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 access and entrances, including access to upper floor residential, commercial and community uses.	
Policy QD 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: - There is no adverse impact on local character, appearance or visual amenity on the site or surrounding area; - Heritage assets and their setting and preserved or enhanced; - They do not result in the unsightly proliferation or dominance of signage and displays in the vicinity of the site;	No HRA Implications This policy is a design management policy regarding advertisement boards.

IPolicy	Description	Likely Significant Effects
	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).	
Policy 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 as a means to retain, reveal or reinstate 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.	No HRA Implications This is a policy regarding preserving and enhancing the historic environment.

IPolicy	Description	Likely Significant Effects
	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.	
Policy HE 2 – Designated Heritage Assets	A. Development proposals affecting the Maritime Greenwich World Heritage Site Buffer Zone must protect and preserve the significance, integrity and authenticity of the Site's 'Outstanding Universal Value', 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 (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 impact on the special characteristics of a Conservation Area, taking into account if the development in isolation	No HRA Implications This policy is a protective policy for the designated heritage assets within the borough such as conservation areas listed buildings and scheduled monuments.

IPolicy	Description	Likely Significant Effects
	would lead to less than substantial harm but cumulatively would adversely affect the character and appearance of the Conservation area. . C. Development proposals 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 the front gardens and boundary walls, important to an area's character or appearance, if necessary, by the use of Article 4 Directions. 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 the demolition of buildings or structures that make a positive contribution to the character or appearance of a Conservation Area will be resisted. F. Development proposals for bin sheds and bike stores should be located at the site or rear of properties with a front access to the side and rear exists. 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 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. I. Development proposals involving Listed Buildings (including alterations, extensions, refurbishment and repairs) will only be supported where: - They relate sensitively to the building, and preserve or enhance its significance; - The setting of Listed Building is preserved or enhanced to better reveal the significance of the asset; - Important views, both of and from, the Listed Building are protected; and	

IPolicy	Description	Likely Significant Effects
	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. 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 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. 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. M. Development proposals 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 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.	

IPolicy	Description	Likely Significant Effects
	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.	
Policy HE 3 – 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 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 must: - Preserve the characteristics that contribute to the area's significance, which may include the spatial, architectural, townscape, landscape or archaeological distinctiveness; - Secure the retention of unlisted buildings where these contribute positively to the local distinctiveness of the area; and - Ensure development in its setting preserves the area's special local character. Archaeology E. Development proposals 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:	No HRA Implications This policy is a design management policy with regards to protecting archaeology and areas of special local character within the borough

IPolicy	Description	Likely Significant Effects
	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 proposals that have the potential to affect archaeological interests must be accompanied by an Archaeological Statement, which should be submitted as part of the Heritage Statement and refer to any relevant information in the GLHER. With the advice of GLAAS, the Council may require a further site specific survey and/or intervention. 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. 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. 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.	
Policy HO 1 – Meeting Lewisham's Housing Needs	A. The Council will work positively and proactively with stakeholders, 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:	Potential HRA Implications requiring further consideration of LSE in the body of the report text. An increase in net new dwellings has the <u>potential</u> to cause a likely significant effect on any European

IPolicy	Description	Likely Significant Effects
	a. The London Plan minimum ten-year target for the Borough of 16,670 net housing completions over the period 2019/2020 to 2028/2029 (or 1,667 net completions per year) is met and exceeded b. The delivery of at least 25,005 net housing completions over the 15-year period from the start of the local plan, 2020/2021 to 2034/2035 (or 1,667 net completions per year). 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 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. 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 housing development to Opportunity Areas, Growth Nodes, Regeneration Nodes, Growth Corridors, town centres and other well-connected and sustainable locations, consistent with the spatial strategy for the Borough set out in Policy OL1 (Delivering an Open Lewisham); b. Allocating strategic sites for new housing, 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 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);	designated sites should the dwellings be within the Zone of Influence. Potential Impact pathways include: • Recreational pressure • Water quality and resources • Air quality

IPolicy	Description	Likely Significant Effects
	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; g. Refusing development proposals that will result in the net loss of housing unless: i. It is suitably replaced at existing or higher densities with at least the equivalent 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 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. Development proposals for housing 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). E. Development proposals must deliver an appropriate mix of housing within the site and local area. The appropriate mix should be established on a case-by-case basis having regard to the site's location and character, the nature and scale of development proposed, along with: a. The strategic target for 50 percent of all new homes delivered in the Borough to be for genuinely affordable housing; b. The required mix of tenure types for affordable housing, with reference to Policy HO 3 (Genuinely affordable housing); c. The need to secure provision of a mix of unit sizes to meet local need, with reference to the target unit size mix for affordable housing set out Table 7.1; d. The need for provision of family housing units (3+ bedrooms), with a reasonable proportion of family units to be delivered on major developments of 10 or more dwellings; and	

IPolicy	Description	Likely Significant Effects
	e. The delivery of liveable and sustainable neighbourhoods that are appropriately supported by community facilities and other infrastructure. F. Development proposals comprising 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, will be refused unless it can be suitably demonstrated that the housing provision: a. Is located in an area with higher Public Transport Access 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 provision for a mix of unit sizes, including a reasonable amount of family-sized units (3+ bedrooms); or c. Is sited in a local area that consists predominantly of family housing units, and would therefore provide for a 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 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 meet 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; 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	

IPolicy	Description	Likely Significant Effects
	e. Encourage developers and agents to market new housing units for sale or rent to existing local residents and people with a local connection before advertising them more widely to others. 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.	
Policy 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. Housing conversions; c. Housing alterations and extensions; and d. Infill and backland development. B. To help facilitate the appropriate development of small sites for housing the Council has prepared the Small Sites SPD and the Alterations and Extensions SPD. Development proposals should have regard to this guidance, where relevant, and demonstrate how it has been used through the design-led approach. 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 of a high quality design with accommodation that meets the relevant standards for living and amenity space, with reference to Policy 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;	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support

IPolicy	Description	Likely Significant Effects
	e. Make provision for affordable housing, in line with Policy HO3 (Genuinely affordable housing); f. Protect and do not result in unreasonable adverse impacts on local amenity; g. Do not result in the loss of community infrastructure, with reference to Policy CI1 (Safeguarding and securing community infrastructure); and h. Do not prejudice the delivery of 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 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, 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. ; and f. The development will not result in an adverse impact on local character. F. Development proposals for the conversion of properties into Houses in Multiple Occupation will be considered against Policy HO8 (Housing with Shared Facilities - Houses in Multiple Occupation).	

IPolicy	Description	Likely Significant Effects
Policy 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 proposals that deliver high quality affordable housing through the Fast Track Route, as detailed in HO3.F below, to achieve a minimum 35 percent affordable housing will be considered favourably. Development proposals involving new housing will only be supported where the site capacity has been optimised and delivery of affordable housing maximised. 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 HO8 (Purpose Built Student Accommodation). C. The affordable housing requirements for major developments (large sites) will apply in circumstances where development has already been permitted and 10 or more dwelling units will be delivered taking into account: - 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 - 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.	No HRA Implications This policy is a design management policy which regards the levels of affordable housing within any residential development proposed. It does not allocate a quantum of residential dwellings.

IPolicy	Description	Likely Significant Effects
	Large sites (major development) E. Development proposals for new housing, including mixed-use developments, with site capacity to accommodate 10 or more dwelling units must deliver the maximum amount of genuinely affordable housing, taking into account: - Their contribution to the Borough's strategic affordable housing target, based on habitable rooms, subject to viability; - 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); - The preferred housing size mix for genuinely affordable housing, as set out in Table 7.1; - Availability of public subsidy; and - 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 H6 (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 is set at: - A minimum of 35 percent; - A minimum 50 percent on public sector land; - A minimum of 50 percent 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 Viability Assessment 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 Existing Use Value (EUV) Premium or the potential for Alternative Use Value⁴⁶. In order to ensure transparency in the planning process the viability	

⁴⁶ This approach is line with the Government's National Planning Practice Guidance and the London Mayor's Affordable Housing and Viability SPG.

IPolicy	Description	Likely Significant Effects
	assessment must be undertaken in line with the Mayor's Affordable Housing and Viability SPG or future equivalent. 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: - It is not practical or feasible to provide affordable housing on-site due to site development constraints; - A higher level of affordable housing can be secured through provision on an alternative site; - Off-site provision is necessary to better meet priority housing need, such as for affordable family housing; - The provision will better support inclusive and mixed communities. Small sites (minor development) J. Development proposals for new housing delivering between 2 and 9 dwelling units must make provision for affordable housing. They should seek to deliver affordable housing on-site wherever feasible, 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 payments in lieu). Further details will be set out in the Planning Obligations SPD 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	

IPolicy	Description	Likely Significant Effects
	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 development must be of a high quality design having regard to other Local Plan policies. 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 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). Vacant Building Credit 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: - The building is not in use at the time the application is submitted; - The building is not covered by an extant or recently expired permission; - The site is not protected for an alternative land use; and - 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.	
Policy 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.	No HRA Implication

IPolicy	Description	Likely Significant Effects
	B. Development proposals involving housing estate renewal and regeneration 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 of a high quality design and provides for demonstrable physical improvements to the housing estate and local area environment, consistent with other Local Plan policies; and e. Strong and inclusive communities can be better fostered and supported, with spaces and facilities that enhance opportunities for social interaction and integration.	This policy is a development management policy which sets criteria by which proposals must demonstrate for support
Policy HO 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. This includes new build development and the appropriate retrofitting of housing units. Specialist older person's accommodation and care home accommodation should supplement conventional housing to meet the needs of Lewisham's older resident population. Specialist older persons accommodation B. Development proposals for specialist older persons accommodation will only be supported where they: a. Respond positively to the objectives in Lewisham's Housing Strategy; b. Make provision for a mix of tenure types including affordable housing with reference to Policy HO3 (Genuinely affordable housing); c. Make provision of accessible housing, in line with Policy QD2 (Inclusive and safe design); d. Are sited at well-connected locations that are well-served by public transport and provide for good access to community facilities and services (including health and social care) appropriate to the intended occupiers;	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support

IPolicy	Description	Likely Significant Effects
	e. Are of a high quality 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. Private, communal and public amenity space; and iii. Access, parking and servicing arrangements, including for all types of vehicles expected to access the development. Care home accommodation C. Development proposals for care home accommodation in the C2 Use Class will only be supported where they are appropriately located and of a high quality design, having regard to Policy HO6.B.d-e. 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 D. Development proposals that will result in the net loss of floorspace for specialist older persons or care home accommodation will be refused unless it can be demonstrated that: a. There is a long-term surplus of this type of accommodation in Lewisham (i.e. there is no unmet local need); or b. Adequate replacement provision will be provided on-site or elsewhere within the Borough; 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. E. Where the loss of specialist older persons or care home accommodation is acceptable in line with (D) above, development proposals must secure the re-provision of an equivalent amount of floorspace for residential use, ensuring no net loss of affordable housing, and provide new affordable housing, where appropriate.	
Policy HO 6 Supported Accommodation	A. Development proposals for supported and specialised accommodation will only be supported where they:	No HRA Implication

IPolicy	Description	Likely Significant Effects
	a. Meet an identified need for the type of accommodation proposed; b. Make provision for a mix of tenure types including affordable housing, where appropriate, with reference to Policy HO3 (Genuinely affordable housing); c. Support mixed and inclusive neighbourhoods and communities without leading to a harmful overconcentration of supported or specialised accommodation. 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 vi. Anti-social behaviour and public safety; d. Are appropriately located in areas that are well-connected to services and facilities that are likely to be required by the occupiers; and e. Are of a high quality design, giving consideration to the: i. Intensity of use that is appropriate to the size of the development; ii. Integration of accommodation and facilities for the specific use or group it is intended for; iii. 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 in the net loss of floorspace for supported or specialised accommodation will be 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; or	This policy is a development management policy which sets criteria by which proposals must demonstrate for support

IPolicy	Description	Likely Significant Effects
	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 must secure the re-provision of an equivalent amount of floorspace for residential use, including an element of affordable housing, where appropriate.	
Policy HO 7 – Purpose Built Student Accommodation	A. Development proposals for Purpose Built Student Accommodation (PBSA) will only be supported where it is demonstrated that: a. They help to meet an identified need for this type of housing (giving priority to the local 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; 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. The accommodation is secured for use by students, as demonstrated by an agreement with one or more specific higher education provider(s); and c. The maximum level of accommodation is secured affordable student accommodation, in line with the London Plan. B. Development proposals for PBSA must be appropriately located: a. At well-connected sites that are easy to access by walking, 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. Giving priority to sites located in proximity to the education facility the development is intended to serve, or other higher education institutions in the Borough.	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support

IPolicy	Description	Likely Significant Effects
	C. Development proposals for PBSA must be of a high quality design, giving particular consideration to: 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 provision for wheelchair accessible accommodation, spaces and facilities; c. Amenity of occupiers and neighbouring properties including consideration for outlook, daylight and sunlight, noise and ventilation; d. Adequate on-site cycle parking facilities; e. Accommodation that is suitable for year-round occupation. 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 the loss of PBSA will be 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 will be provided in an appropriate location accessible to the higher education institution it serves. F. Where the loss of PBSA is acceptable in line with (E) above, development proposals must secure the re-provision of an equivalent amount of floorspace for residential use, including an element of affordable housing, where appropriate.	
Policy HO 8 – Housing with Shared Facilities (Houses in Multiple Occupation)	A. Development proposals for housing with shared facilities (i.e. Houses in Multiple Occupation) (HMOs) in the Sui Generis Use Class will only be permitted where they: a. Do not result in the loss of existing housing suitable for family occupation, which includes but is not limited to the following considerations: i. Location within a residential street or area;	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support

IPolicy	Description	Likely Significant Effects
	ii. Size and layout, including number and size of individual rooms and bedrooms; iii. Amenity space, such as access to a private garden; b. Contribute to inclusive and mixed neighbourhoods and do not result in a harmful overconcentration of HMOs. 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 vi. Anti-social behaviour and public safety. c. Are appropriately located in areas that are well-connected to local services by walking, cycling and public transport; and 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. 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: a. The gross original internal floorspace of the original dwelling is 130 square metres or greater; and b. The requirements of (A)(b-d) 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 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	

IPolicy	Description	Likely Significant Effects
	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 housing provision that meets an acute local 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 large-scale purpose-built shared living accommodation in the Sui Generis Use Class will only be permitted where it is suitably demonstrated that: a. There is an identified local 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 units within the development are demonstrably not self-contained homes in the C3 Use Class or capable of being used as self-contained homes; c. There is well-integrated provision of communal facilities and services sufficient to meet the requirements of the intended number of occupiers; d. The development is appropriately located and of a high quality 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 minimum tenancy lengths of no less than 3 months; and g. A cash-in-lieu contribution is made towards affordable housing in the C3 Use Class.	
Policy HO 10 – 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 plots to help meet identified need for self-build and custom-build housing particularly where this will improve access to affordable housing.	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support

IPolicy	Description	Likely Significant Effects
	B. Development proposals for self-build or custom-build housing will only be supported where they: a. Make the optimal use of land and support the delivery of the spatial strategy; b. Make provision for affordable housing in line with Policy HO3 (Genuinely affordable housing); and c. Are appropriately located and of a high quality design, with reference to other Local Plan policies. Development proposals for self-build and custom-build housing must demonstrate how the design-led approach has been used. They should clearly identify whether there are any elements of the	
Policy HO 11 – Gypsy and Traveller Accommodation	A. There is an identified need in Lewisham up to 2031 for 6 additional permanent gypsy and traveller pitches. To meet this need in full a site allocation policy is included in this Local Plan. B. Development proposals for gypsy and traveller accommodation, including sites and pitches, must be of a high quality layout and design and make adequate provision for: a. Basic amenities including running water, sewerage/drainage, energy and waste management; b. Safe and reasonably convenient access to and from the site; c. Access, parking and servicing arrangements for all vehicles likely to use the site, including emergency services; d. A site location that is well-integrated into the locality with reasonable access to local shops, services and community facilities including education, health and social care; and e. Facilities to serve occupiers of the development, including where appropriate pitches, hardstanding, amenity blocks, and amenity space and play areas. C. Development proposals for gypsy and traveller accommodation must not pose a risk to public health and safety, and not adversely impact on the amenity of site occupants and neighbouring properties.	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
Policy EC 1 – A Thriving and Inclusive Local Economy	A. The Council will work positively with stakeholders and its delivery partners to build a thriving and inclusive local economy that provides everyone with access to high quality education, training and good job opportunities. 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. Ensuring the timely delivery of infrastructure to support business growth and development and to better enable 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 are well-connected and suited to the needs of modern business; d. Requiring that new employment development is of a high quality design and contributes positively to the local area; e. Retaining and securing new low-cost and affordable workspace and ensuring it is appropriately managed; and f. Ensuring residents benefit from good access to high quality jobs as well as education, skills and employment training opportunities.	No HRA Implications Although this policy supports infrastructure and the promotion of cultural industries. The policy is more of a design management policy ensuring the development of these industries and the appropriate infrastructure is designed to a high-quality standard and provides residents of the borough to high quality education, skills and employment training opportunities
Policy EC 2 – Protecting Employment Sites and Delivering New Workspace	A. Land within Lewisham's employment land hierarchy, as set out in Table 8.1, is safeguarded for Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and related Sui Generis uses. Development proposals must ensure that land-uses are commensurate with the type and function of land within this hierarchy. B. There is a forecast need for 21,800 square metres of net additional employment floorspace in the Borough up to 2038. Development proposals must contribute to meeting this need by:	Potential HRA Implications requiring further consideration of likely significant effects in the body of the report An increase in employment space has the <i>potential</i> to cause likely significant effects with regards to air quality pathways through an increase in journeys to work past European designated sites.

IPolicy	Description	Likely Significant Effects
	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; b. Facilitating the delivery of new modern workspace through the comprehensive regeneration of Mixed-use Employment Locations (MEL); c. Maximising opportunities to deliver new and enhanced workspace, including through appropriate mixed-use development in town and edge-of-centre locations and non-designated employment sites; d. Outside of SIL, avoiding development that consists solely or predominantly of Class B8 storage or warehousing uses unless: i. The site is currently solely or predominantly in storage and warehousing use; and ii. Redevelopment proposals comprise of intensification of storage and warehousing uses and/or employment generating uses appropriate to the site; and e. Ensuring development does not result in a net loss of viable industrial capacity, whether this is existing or consented but not built, having regard to other Local Plan policies. 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	

IPolicy	Description	Likely Significant Effects																					
	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.																						
	<table><tr><th colspan="4">Lewisham's Employment Land Hierarchy</th></tr><tr><th>Type</th><th>Ref</th><th>Location</th><th>Function</th></tr><tr><td>Strategic Industrial Location</td><td>SIL</td><td>Bromley Road Surrey Canal Road (including Bermondsey Dive Under)</td><td>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.</td></tr><tr><td>Locally Significant Industrial Site</td><td>LSIS</td><td>Apollo Business Centre Blackheath Hill Childers Street West Clyde Vale Endwell Road Evelyn Court Evelyn Street Lower Creekside Malham Road / 118 Stansted Road Manor Lane Molesworth Street Perry Vale Stanton Square Trundleys Road Willow Way Worsley Bridge Road</td><td>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 light industrial uses.</td></tr><tr><td>Mixed-use Employment Location</td><td>MEL</td><td>Arklow Road Childers Street East Convoys Wharf Grinstead Road Oxestalls Road Plough Way</td><td>Larger redundant and/or underused industrial sites where plan-led, mixed-use redevelopment is permitted to support regeneration and</td></tr></table>	Lewisham's Employment Land Hierarchy				Type	Ref	Location	Function	Strategic Industrial Location	SIL	Bromley Road Surrey Canal Road (including Bermondsey Dive Under)	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.	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 / 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 light industrial uses.	Mixed-use Employment Location	MEL	Arklow Road Childers Street East Convoys Wharf Grinstead Road Oxestalls Road Plough Way	Larger redundant and/or underused industrial sites where plan-led, mixed-use redevelopment is permitted to support regeneration and		
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IPolicy	Description				Likely Significant Effects
			Sun and Kent Wharf Surrey Canal Triangle	enable the delivery of new, modern workspace.	
	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.	
Policy EC 3 – High quality Employment Areas and Workspace	A. Development proposals for Class E business, B2 industrial and B8 storage or distribution uses and related Sui Generis uses must be of a high quality design with well-integrated and purpose built business space. They must demonstrate how the design-led approach has been used to improve the site's suitability for business activity having regard to the type and use of space. Development proposals must: a. Optimise the use of land and maximise opportunities to increase job densities; b. Make provision for an appropriate level of internal fit out beyond shell and core, including: i. Connection-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; vi. Shopfronts and glazing, where appropriate. c. Make provision for flexible workspace that can be adapted to the needs of different employment uses, particularly where there is not a specified end user; d. Ensure the layout and design of development provides adequate operational space including for site access and servicing; e. Improve the attractiveness and environmental quality of the site and employment area, including high quality public realm, where appropriate; and f. Ensure a coherent and positive relationship with adjoining and neighbouring land uses and protect local amenity, with reference to other Local Plan policies.				No HRA Implications Although the policy supports new development the policy is more for the protection of existing sites with any new allocated sites within the site allocation policies therefore, this policy can be screened out.

IPolicy	Description	Likely Significant Effects
	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. C. Within the Forest Hill Cultural Quarter and Endwell Road LSIS, development proposals for new self-contained live-work units will only be 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.	
Policy EC 4 – Providing Suitable Business Space and Affordable Workspace	A. Development proposals incorporating business space 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 low-cost workspace this should be retained or re-provided. 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. 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. 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 must make provision for affordable workspace. Developments must provide at least 10per cent of the rentable floorspace (Net Internal Area) as affordable workspace at 50 per cent of market rents. Affordable workspace should be provided on-site. . . Off-site provision will only be acceptable where it is demonstrated to the satisfaction of the Council that on-site provision is not feasible	No HRA Implications This policy is a development management policy regarding the level of affordable business units and the range of business units provided.

IPolicy	Description	Likely Significant Effects
	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 contributions will be used to support the provision of affordable workspace in Lewisham. Further details will be set out in the Planning Obligations SPD. E. Where new affordable workspace is provided this must be secured for a specified period agreed by the Council In order to ensure that workspace is appropriately managed it must be provided in one of the following ways: - Leased and managed by an affordable workspace provider approved by the Council, with an agreed Workspace Management Plan; - 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; - Leased by the owner to an end user approved by the Council that requires non-managed workspace. 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. 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	

IPolicy	Description	Likely Significant Effects
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 within or adjacent to SILs 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. 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. The reconfiguration of the Surrey Canal Road SIL is facilitated 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.	No HRA Implications This policy is a development management policy regarding conditions by which development will be supported at Strategic Industrial Locations (SILs)
EC 6 - Locally Significant Industrial Sites	E. LSIS will be protected for Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution and related Sui Generis uses, with priority being given to 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. F. 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. G. Within LSIS, development proposals for self-storage and large format storage and warehousing uses and facilities will only be permitted where: - The requirements of Policy EC2.B(d) (Protecting employment land and delivering new workspace) are satisfied; or - There is a demonstrable local need or market demand for the use proposed;	No HRA Implications This policy is a development management policy regarding the level of affordable business units and the range of business units provided.

IPolicy	Description	Likely Significant Effects
	c. The use cannot be reasonably located in a SIL, as evidenced by a detailed site selection exercise; and d. The development will include provision of a reasonable proportion of flexible workspace or units for micro, small or medium-sized businesses. H. The co-location of employment and other compatible uses will only be permitted at selected LSIS in order to secure the long-term viability of LSIS and to help facilitate their renewal and regeneration. Development proposals involving the co-location of uses must not compromise the function of the LSIS in line with (B) above. Further development requirements are set out in site allocation policies for the following sites: a. Apollo Business Centre b. Blackheath Hill c. Childers Street North d. Clyde Vale e. Evelyn Court f. Lower Creekside g. Manor Lane (Part) h. Perry Vale i. Stanton Square j. Trundleys Road k. Willow Way l. Worsley Bridge Road I. Development proposals for the co-location of uses on LSIS sites listed in 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 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 of the LSIS or preclude the delivery of the spatial strategy for the Borough; c. Delivers wider public benefit(s) to overcome the loss of industrial capacity; and	

IPolicy	Description	Likely Significant Effects
	d. Makes provision of at least 50 per cent affordable housing on the residential element of the development. J. On LSIS where the co-location of uses is not permitted by Policy EC6.D development proposals 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. 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 of the LSIS or prejudice the continued operation of commercial and industrial uses on the site, 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 f. Will not compromise the delivery of strategic requirements for industrial capacity, having regard to the proposal's individual and cumulative impact. K. Within LSIS, development proposals for strategic infrastructure will be 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 of the LSIS or prejudice the continued operation of commercial and industrial uses on the site or within the employment area; and	

IPolicy	Description	Likely Significant Effects
	c. The loss of industrial capacity has been minimised as much as reasonably practical and efforts have been made to replace any such losses.	
Policy EC 7 – Mixed-use Employment Locations	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 new modern workspace with priority given to Class E(g) office and light industrial uses. All development proposals within MELs must be delivered in accordance with relevant site allocation policies and a site-wide masterplan. Development proposals 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. Development proposals must not adversely impact on the function or effectiveness of MELs to accommodate business uses. Development proposals must maximise the amount of Class E(g) office and light industrial uses through site redevelopment, along with providing a demonstrable and significant uplift in the number of jobs. Development proposals must make provision for high quality workspace and ensure that this 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: - Retain, and wherever possible seek to increase, the proportion of industrial capacity across the MEL, as originally approved in the masterplan and planning consent; and - Ensure there is no net loss of existing industrial capacity.	No HRA Implications Although the policy supports new development the policy is more for the protection of existing sites with any new allocated sites within the site allocation policies therefore, this policy can be screened out.
Policy EC 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.	No HRA Implications Although the policy supports new development the policy is more for the protection of existing sites with any new

IPolicy	Description	Likely Significant Effects
	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 they are located within a 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: - Maximises the amount of industrial capacity; - Provides demonstrable improvements in the site's suitability for continued employment use, having particular regard to Policy EC3 (High quality employment areas and workspace); - 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; - Ensures appropriate protection of amenity both for the users of the development and neighbouring properties, with reference to the Agent of Change principle; and - 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 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: - Feasible alternative commercial, industrial and/or employment generating uses; - 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; - Site constraints including layout, access and compatibility with neighbouring uses; - Long-term vacancy; and - Evidence of recent and continuous marketing, covering a minimum period of 24 months and at an appropriate rental or sale value.	allocated sites within the site allocation policies therefore, this policy can be screened out.

IPolicy	Description	Likely Significant Effects
	D. On sites where the introduction of a residential element is acceptable in line with (C) above, development proposals must make provision for affordable housing, in line with Policy HO3 (Genuinely affordable housing). E. Development proposals involving the net loss of industrial capacity must make a financial contribution towards training or other employment related initiatives, in line with Policies EC10 (Workplace training and job opportunities) and DM2 (Infrastructure funding and planning obligations).	
Policy EC 9 – Railway Arches	A. Development proposals involving railway arches will be supported where: - The principal use is for an appropriate commercial, industrial, community, cultural or similar Sui Generis use, or - An operational use associated with the railway or public highway; and - The use will not cause harm to the amenity of neighbouring uses and properties. 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. D. Proposals involving the comprehensive redevelopment of sites that include, or are adjacent to, railway arches must address the use of the arches through the design-led approach, and where relevant the masterplan process. 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, Transport for London and the Highway Authority should be consulted on development and design options through the design-led approach	No HRA Implication Although this policy supports development of sites involving railway arches. This policy does not allocate sites or a quantum of development, merely sets out the criteria of where a development would be supported.

IPolicy	Description	Likely Significant Effects
Policy EC 10 – Workplace Training and Job Opportunities	A. The Council will work with stakeholders, including the Mayor of London, the London Economic Action Partnership, and Lewisham Deal Partners to support the Local Plan objectives for delivering a thriving and inclusive local economy. B. Development proposals should make reasonable efforts to actively source local businesses, recruit local workers and provide workplace training, skills development, apprenticeships and other education and training opportunities 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. C. Major development proposals must make provision for workplace training in Lewisham. 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 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, development proposals involving a net loss of industrial 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 a development proposal will result in a net loss of industrial capacity, a financial contribution will be required for workplace training, using the formula set out in Table 8.3 (Financial contributions for workplace training). This will be secured by conditions or planning contributions and used to support the Council's local labour scheme and associated projects.	No HRA Implications This policy is to encourage businesses to provide training opportunities and apprenticeships to residents of the borough.
Policy EC 11 – Town Centres at the Heart of Our Communities	A. Town centres are and should remain at the heart of Lewisham's neighbourhoods and communities 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, including those presented by new technology and changes in consumer behaviour, such as online shopping.	No HRA Implications This policy regards design and development management of town centres to ensure they are attractive and lively places.

IPolicy	Description	Likely Significant Effects
	B. Development proposals should support and help to secure the long-term vitality and viability of Lewisham's town centres by: a. Optimising the use of land within and around them; b. Maintaining and enhancing their distinctive features and characteristics where these make a positive contribution to the neighbourhood, including their built form, environmental, historic and cultural character; c. Ensuring they are inclusive, safe and healthy places 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 promote and enable movement by walking, cycling and the use of public transport; ii. Encourage street level activity along with opportunities for social interaction and relaxation, including through provision of publicly accessible open space; and 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. Ensuring town centres function as vibrant places of daytime, evening and night-time activities.	
Policy EC 12 – Town Centre Network and Hierarchy	A. Development proposals must support and reinforce Lewisham's town centre network and hierarchy. They must demonstrate how the development will maintain and enhance town centre vitality and viability 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 development 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 are directed to locations within town centres or, if no suitable town centre sites are available or expected to	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	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. Development proposals for new main town centre uses in out-of-centre locations 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. E. Retail Impact Assessments (RIAs) will be required 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 RIA demonstrates that: - There is an identified need and market demand 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. F. Development proposals within town centres should contribute to the delivery of and support the appropriate distribution of retail uses to help ensure the Borough's future need for 8,400 additional gross square metres of retail floorspace up to 2035 is met. Proposals for new major Use Class E(a) retail development should prioritise Lewisham and Catford Major Centres in the site selection process before considering other appropriate locations, including District Centres. G. Development within Lewisham town centre and its surrounds will be proactively managed in order to secure its future reclassification as a Metropolitan centre in the	

IPolicy	Description	Likely Significant Effects															
	London Plan. Development proposals should direct new investment and facilitate the delivery of strategic infrastructure to ensure the centre can effectively serve a local and wider sub-regional catchment, with reference to Policy LCA2 (Lewisham Major Centre and surrounds). <table border="1"> <thead> <tr> <th colspan="3" data-bbox="544 392 1476 421">Lewisham's Town Centre Network and Hierarchy</th></tr> <tr> <th data-bbox="544 421 745 450">Classification</th><th data-bbox="745 421 1126 450">Location</th><th data-bbox="1126 421 1476 450">Role/function</th></tr> </thead> <tbody> <tr> <td data-bbox="544 450 745 759">Major town centre</td><td data-bbox="745 450 1126 759">Lewisham Catford</td><td data-bbox="1126 450 1476 759">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.</td></tr> <tr> <td data-bbox="544 759 745 1262">District town centre</td><td data-bbox="745 759 1126 1262">Blackheath Deptford Downham Forest Hill Lee Green New Cross Gate Sydenham</td><td data-bbox="1126 759 1476 1262">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.</td></tr> <tr> <td data-bbox="544 1262 745 1394">Local centre</td><td data-bbox="745 1262 1126 1394">Bellingham Brockley Cross Burnt Ash Crofton Park Downham Way</td><td data-bbox="1126 1262 1476 1394">Found within various areas of Lewisham with decent transport links, these smaller centres serve the surrounding neighbourhood and complement the larger major</td></tr> </tbody> </table>	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 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	Bellingham Brockley Cross Burnt Ash Crofton Park Downham Way	Found within various areas of Lewisham with decent transport links, these smaller centres serve the surrounding neighbourhood and complement the larger major	
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IPolicy	Description		Likely Significant Effects
		Staplehurst Road Hither Green Lane Honour Oak / Brockley Rise Grove Park Ladywell Lewisham Way New Cross Road Upper Sydenham/Kirkdale	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.
Policy 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 commercial units; and c. Avoiding designs that comprise of single-storey development. B. Within town centres and edge-of-centre locations, mixed-use development proposals (including 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:		No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	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. Development proposals affecting an existing commercial unit must ensure any ancillary floorspace that is integral to business operations and viability of the unit is not compromised or lost.	
Policy EC 14 – Major and District Centres	A. Development proposals within and at the edge of a Major or District centre must demonstrate how they will support the vitality and viability of the town centre and make a positive contribution to its local character, with reference to Policy EC11 (Town centres at the heart of our communities). 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 proposals should support the retail function of the PSA. New Class E(a) retail uses are encouraged to locate in the PSA in order to support and enhance town centre vitality and viability through the provision of a complementary cluster 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	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	d. Ensuring local amenity is not unreasonably harmed by increased noise, odour, fumes and other nuisances. D. In Lewisham Major centre, development proposals should support the role and function of the centre by contributing to the target for the PSA to maintain a minimum of 50 per cent of retail uses as a proportion of all units. Development proposals that will result in the percentage of 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. 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 F. Within a Major or District town centre development proposals for main town centre uses will be supported where: - The use will not result in a harmful overconcentration of similar uses, having regard to Policy EC17 (Concentration of uses); - They provide a positive frontage including an active ground floor frontage 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 - They comply with other Local Plan policies. G. Development proposals for residential uses on the ground floor level or below, both within the PSA and the wider town centre area, are inappropriate and will be	

IPolicy	Description	Likely Significant Effects
	strongly resisted. This includes proposals for the conversion of units currently in a main town centre or complementary commercial, cultural or community use.	
Policy EC 15 – Local Centres	A. Development proposals within and at the edge of a Local Centre must demonstrate how they will support the vitality and viability of the centre and make a positive contribution to its local character, with reference to Policy EC11 (Town centres at the heart of our communities). B. Development proposals incorporating small 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 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. D. Development proposals involving the change of use from Class E to other main town centre uses within Local Centres will only be supported where it is demonstrated that: - The replacement use is an appropriate main town centre, community, cultural or employment generating use; and - An active 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 positive frontage. E. Development proposals for the change of a main town centre use to a residential use at the ground floor level or below will only be permitted where: - 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 - There will be no adverse impact on local area character and the continuity of the shopping frontage in the Local Centre.	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	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.	
Policy EC 16 – Shopping Parades, Corner Shops and Other Service Points	A. Retail uses located at shopping parades, corner shops and other service points (i.e. outside of Major, District and Local Centres) provide important day-to-day provision of consumer goods within Lewisham's neighbourhoods and should be protected wherever possible. B. Development proposals involving the change of use from Class E to other main town centre or appropriate employment generating uses at shopping parades, corner shops and other service points will only be supported where it is demonstrated that: - Similar alternative provision is available within the local area which can be reached safely, easily and conveniently by walking, normally within 400-800 metres; and - An active frontage is provided at the ground floor level, or if it can be suitably demonstrated this is not possible a window display or other positive frontage. C. 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 only be permitted where: - It is demonstrated through 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 - There will be no adverse impact on local area character and the continuity of the frontages within the shopping parade or other frontages.	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	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.	
Policy EC 17 – Concentration of Uses	A. Development proposals must not result in a harmful overconcentration of 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. B. The harmful overconcentration of uses will be assessed on the basis of the number of similar uses within a 400 metre radius of the development 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. C. Development proposals for uses listed in (A) must submit sufficient information to allow for an assessment of the concentration of uses, in line with the criteria in (B) above. Hot food takeaways D. In addition to complying with (A) and (B) above, development proposals for hot food takeaways will only be permitted where: a. They are located at least 400 metres away from the boundary of an existing or proposed primary or secondary school; and	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects														
	b. The proportion of hot food takeaway premises in the shopping frontage complies with the thresholds set out in Table 8.3. Food and drink services E. Development proposals for uses involving the service of food and drink must make adequate arrangements to protect and manage local amenity, in line with Policy QD7 (Amenity and agent of change). 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><tr><th colspan="2">Shopping frontage threshold for takeaways</th></tr><tr><th>Location</th><th>Threshold applied</th></tr><tr><td>Primary or secondary School</td><td>400m away from school boundary</td></tr><tr><td>Major / District Centre</td><td>Proportion of premises does not exceed 5% of units</td></tr><tr><td>Local Centre</td><td>Proportion of premises does not exceed 10% of units</td></tr><tr><td>Shopping Parade (20 units or more)</td><td>Maximum of 2 premises</td></tr><tr><td>Shopping Parade (19 units or less)</td><td>Maximum of 1 premise</td></tr></table>	Shopping frontage threshold for takeaways		Location	Threshold applied	Primary or secondary School	400m away from school boundary	Major / District Centre	Proportion of premises does not exceed 5% of units	Local Centre	Proportion of premises does not exceed 10% of units	Shopping Parade (20 units or more)	Maximum of 2 premises	Shopping Parade (19 units or less)	Maximum of 1 premise	
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Policy 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 support the continued growth and development of these industries by: a. Protecting existing cultural venues and uses, including by applying the Agent of Change principle;	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.														

IPolicy	Description	Likely Significant Effects
	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; 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 DM5 (Meanwhile uses); and e. Enabling the provision of high quality, fast and reliable digital infrastructure, in line with Policy TR7 (Digital 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 should support and contribute to enhancing the cultural and creative industries within the CEZ, in line with Policy LNA3 (Lewisham North Creative Enterprise Zone). Cultural quarters	

IPolicy	Description	Likely Significant Effects
	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: - Deptford Creekside; - New Cross; and - Forest Hill. F. Cultural, community and commercial uses will be encouraged and supported within Cultural Quarters, having regard to other Local Plan policies. Development proposals should retain or make appropriate re-provision to accommodate existing cultural, community and commercial uses where these make a positive contribution to a Cultural Quarter. Development proposals that will adversely impact on the distinctive character and function of a Cultural Quarter, including through the loss of viable cultural venues, will be refused. 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). Evening and night-time economy H. Evening and night-time economic activities should make a positive contribution to the neighbourhoods within which they are located by: - 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; - Enhancing the vitality and viability of town centres and other employment areas; and - Reinforcing local character and identity, and creating more inclusive communities, through provision of a locally distinctive and expanded leisure, cultural and entertainment offer. I. Development proposals 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:	

IPolicy	Description	Likely Significant Effects
	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. J. Development proposals for evening and night-time economic activities located outside of town centres will only be supported where the use(s) will complement and not adversely impact on the town centre network and hierarchy. K. Development proposals for evening and night-time economic activities must demonstrate that they: a. Will protect, manage and not result in an unreasonable adverse impact on local amenity ; b. Will not result in a harmful overconcentration of uses, with reference to Policy EC17 (Concentration of uses); c. Are located in well-connected places with easy to reach Night Service transport options; and d. Can be safely accessed during all hours of operation.	
Policy 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	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	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 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. 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 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. 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.	
Policy EC 20 – Markets	A. Development proposals must protect and seek to enhance existing markets and market spaces. New markets or market spaces will be encouraged and supported	No HRA Implication

IPolicy	Description	Likely Significant Effects
	where they complement Lewisham's town centre network and hierarchy, and will make a positive contribution to the culture and vibrancy of the Borough. B. Development proposals for new markets or market space should be directed to appropriate town centre locations. Where new market space is proposed 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 through the sequential approach that they: - Will not adversely impact on the vitality and viability of the town centre network and hierarchy; - Make beneficial use of vacant or underused sites; - Are located in well-connected areas with good Public Transport Access Levels; - Can be appropriately accommodated on streets or other areas of the public realm, where appropriate; and - Are temporary in nature. C. Development proposals that are likely to affect existing markets within town centres will be considered having regard to: - 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 - The impact on town centre vitality and viability with particular consideration given to: - Provision of a range of premises and floorspace to support small and start-up businesses; - Local character, including distinctive character of the market; and - Public realm and townscape. D. Development proposals for markets and market space must demonstrate that there will not be an unreasonable adverse impact on local amenity, and not have a detrimental impact on public health and safety and the public realm.	This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
Policy EC 21 – Visitor Accommodation	A. Development proposals for serviced visitor accommodation must be appropriately located at sites within or at the edge of town centres, or other sites that are well-connected by public transport. B. Development proposals for 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. Are proportionate to their location in terms of size, scale and function; b. Do not result in a harmful overconcentration of serviced visitor accommodation in the area; c. Comply with the relevant London Plan parking standards; d. Ensure adequate access, drop-off/pick-up and servicing arrangements; e. Are of a high quality design, ensure adequate space and amenity for occupants and provide sufficient choice for people who require an accessible bedroom; f. Make appropriate arrangements for long-term adaptability and sustainability; and g. Demonstrate that an agreement is in place to secure an operator prior to the commencement of the development. C. Development proposals for serviced visitor accommodation must be designed with positive frontages, including active ground floor frontages. Where the development incorporates ancillary uses and facilities these should be made available for public use, where appropriate, and access not unreasonably restricted. 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 use of a residential property for ‘temporary sleeping accommodation’ (short-term let or holiday let) must not exceed 90 nights within a calendar year. 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.	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
Policy CI 1 – Safeguarding and Securing Community Infrastructure	A. The Council will work in partnership with stakeholders and its delivery partners to identify needs for community infrastructure over the plan period, and to secure the timely delivery of high quality infrastructure and services to meet these needs. Local needs for community infrastructure in the Borough will be considered taking into account the Infrastructure Delivery Plan along with the relevant corporate plans and strategies of the Council and other key stakeholders, including for: health and social care; education and childcare; youth and family services; play, sport and recreation; libraries and local history services; and burial space. B. Major development proposals will be expected to, and all other development proposals should, plan positively to meet local needs for community infrastructure. Where a site allocation policy sets out requirements for community infrastructure, development proposals will be required to demonstrate how the delivery of this infrastructure will be secured through the masterplan process, with reference to Policy DM3 (Masterplans and comprehensive redevelopment). Elsewhere, development proposals must demonstrate how any additional demands for community infrastructure generated by the development will be appropriately addressed, particularly in those areas where there is an identified need for additional provision, as set out in the Infrastructure Delivery Plan. 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. C. Development proposals will be supported where they safeguard and enhance community infrastructure. Development proposals that will result in the loss of an existing community facility, or land and buildings formerly in community use, will only be permitted where it is suitably demonstrated that: There is no current or future need for the existing use or an alternative community use and there is adequate alternative provision elsewhere to meet the needs of the 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	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	b. There are realistic proposals for replacement provision of an equivalent or improved standard that will continue to meet the needs of the neighbourhood and wider community,; or 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) above cannot be satisfied, consideration will be given to the use of payment-in-lieu contributions. Development proposals must provide evidence to demonstrate that the existing or an appropriate alternative community use is not viable. 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).	
Policy CI 2 – New and Enhanced Community Infrastructure	A. Development proposals for new community infrastructure (including the alteration, extension or reconfiguration of existing community infrastructure), will be supported where the facility: a. Is appropriately located for the intended use; b. Is easily accessible by public transport, walking and cycling; c. Is designed to maximise the flexibility and adaptability of space to accommodate a range of community uses; d. Includes provision of well-integrated facilities that support the effective functioning and viability of the community use, such as meeting spaces, broadband connection, kitchen facilities, toilets and dedicated storage space; e. Is made available for use by the public as much as reasonably practical, and does not unreasonably restrict access to the wider community; and f. Will not result in a significant adverse impact on the amenity of neighbouring uses and properties. B. Development proposals must make the best of use of land, including the public sector estate. Innovative approaches to community infrastructure provision (such as	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	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 must ensure that the facility will be appropriately managed and maintained over its lifetime.	
Policy CI 3 – Play and Informal Recreation	A. Development proposals should help to ensure that people of all ages and abilities have access to a wide range of opportunities for sports, recreation and play. They should maximise opportunities to provide new or improved community 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 C. Development proposals that are likely to be occupied or used by children and young people must increase opportunities for play and informal recreation. Where located in areas with identified deficiencies in play space, new housing development must provide demonstrable improvements in the quantity and quality of play space. D. Development proposals for new housing must incorporate well-designed and high quality formal play provision of at least 10 square metres per child. Provision should be delivered on-site and made accessible to all children in the development without being segregated by housing tenure. Off-site provision will only be acceptable in exceptional circumstances, where it can be suitably demonstrated that on-site	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	provision is not feasible and 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. Off-site provision 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). E. All play space and provision for informal recreation must be sensitively integrated into the site and neighbourhood, and be designed to: - Ensure that public access is encouraged and not unreasonably restricted, and made free-to-use wherever secured as part of new housing development; - Provide a stimulating and pleasant environment that promotes social cohesion, including by enabling users of different ages and abilities to interact as well as to move around and play independently; - Provide opportunities for respite, such as benches or seating areas; - Enable informal supervision through passive surveillance; - Integrate natural features such as trees, landscaped play areas and other greening measures; - Maximise the use of permeable surfaces and Sustainable Drainage Systems; and - 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. G. Development proposals including new or enhanced play space must ensure the provision will be appropriately managed and maintained over its lifetime. H. Development proposals that will result in the loss of play space, whether existing or consented but not built, will be refused unless:	

IPolicy	Description	Likely Significant Effects
	a. Replacement provision of at least an equivalent amount and improved quality will be provided, either on-site or in proximity to it, within a reasonable walking distance for the intended age group; or b. It can be suitably demonstrated that there is no ongoing or future demand for the play space, with reference to the Lewisham Play Strategy.	
Policy CI 4 – Nurseries and Childcare Facilities	A. Development proposals for day nurseries and childcare facilities (including child minding, playgroups and related activities) must: a. Be located where they can be safely and easily accessed by walking, cycling and public transport; b. Not have an unacceptable adverse impact on the road network and ensure adequate arrangements for car parking including access, 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 amenity; d. Respond positively to local character; and e. Secure provision 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 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 elsewhere in the Local Plan; b. The community use is ancillary to the residential use; c. There is a demonstrable local need or market demand for the use proposed; and d. There are no suitable and available non-residential premises to accommodate the use.	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.
Policy 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 existing cemeteries and working with	No HRA Implication

IPolicy	Description	Likely Significant Effects
	stakeholders to appropriately maintain these, along with seeking opportunities to enhance the capacity of existing facilities for new burial space, where appropriate. B. Development proposals involving the provision of new burial space or related facilities must demonstrate that the provision: - Adequately meets the requirements of the various groups within the Borough, including those groups for whom burial is the only option; - Is appropriately located and within reasonable proximity to the community it is intended to serve; - Identifies and appropriately responds to potential flood risk issues, including through the incorporation of mitigation measures; and - Will not adversely impact on open spaces and biodiversity, with reference to other Local Plan policies.	This policy is a development management policy which sets criteria by which proposals must demonstrate for support.
Policy GR 1 – Green Infrastructure	A. Lewisham's network of green and open spaces, waterways and green features 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 also integral to supporting sustainable neighbourhoods and communities by providing a wide range of multifunctional environmental, social and economic benefits. Development proposals must protect and seek to enhance provision of green infrastructure across the Borough, including by improving or creating new links between its different elements. B. Development proposals must investigate and maximise opportunities to enhance existing green infrastructure and create new provision on site, with reference to the All London Green Grid. Consideration should be given to the site context including its setting within the wider landscape. 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.	No HRA Implications This policy is a protective policy for the natural green infrastructure in the borough. Development proposals will be expected to protect and enhance green infrastructure with proposals.
Policy GR 2 – Open Space	A. Open spaces are integral components of Lewisham's Green Grid and will be protected from inappropriate development, in accordance with Lewisham's open space hierarchy.	No HRA Implications

IPolicy	Description	Likely Significant Effects
	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: - Replacement provision of at least an equivalent amount (i.e. no net loss) and better quality will be provided. The replacement provision must: - 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; - Not result in an increase in public open space deficiency; - Be publicly accessible; - The development will provide a wider public benefit which clearly outweighs the loss of the existing open space; - There will be no adverse impact on biodiversity, with reference to Policy GR3 (Biodiversity and access to nature); - 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 - 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.	This policy is a protective policy for the natural open space in the borough. Development proposals will be expected to protect and enhance open space with proposals.

IPolicy	Description	Likely Significant Effects
	Neighbourhood Open Space F. Development proposals involving the reconfiguration of Neighbourhood Open Space will only be supported where: - There is no net loss of open space, including play space, and net gains are achieved wherever possible; - There is no detrimental impact on the environmental function of the open space, including support for nature conservation; - There will be demonstrable improvements in the quality of open space and public access to it; - 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: - The development will provide a wider public benefit which clearly outweighs the loss of the open space; - The development cannot feasibly be delivered without the loss of part or all of the open space; - 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); - There will be improvements to the quality of the remaining open space; and - Appropriate provision is made for existing play space and market space with reference to CI 3 (Play and informal recreation) and EC 20 (Markets). Ancillary uses H. Development proposals for ancillary uses on open space that help to improve the quality of open space and promote access to a wide range of users will be supported where they: - Are demonstrably ancillary to the use of land as open space; - Are necessary to facilitate or support the appropriate use of the open space;	

IPolicy	Description	Likely Significant Effects						
	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 of a high quality design, including by following inclusive 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, should maximise opportunities to introduce new publicly accessible open space, giving priority to green space, as well as improve connections to existing or planned new open spaces, particularly in areas of open space deficiency. Major developments 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. J. With reference to Policy GR4 (Lewisham Links) development must maintain and wherever possible enhance access to and connections between the network of open 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. K. Development proposals located adjacent to open space must respond positively to the character of the open space as well as protect, and wherever possible enhance, the biodiversity value and visual amenity provided by it. Lewisham's open space hierarchy <table border="1"> <thead> <tr> <th>Categorisation</th><th>Description</th><th>Primary function</th></tr> </thead> <tbody> <tr> <td> </td><td> </td><td> </td></tr> </tbody> </table>	Categorisation	Description	Primary function				
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IPolicy	Description	Likely Significant Effects
	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 Policies Map. Provision for children and young people, informal amenity space and civic and market squares and hard-surfaced areas designed for pedestrians.

IPolicy	Description	Likely Significant Effects
Policy 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 nature conservation and to deliver Biodiversity Net Gain within the Borough. B. Sites of Importance for Nature Conservation (SINCs) are safeguarded in the Local Plan. Development proposals must protect and maximise opportunities to enhance the wildlife value of SINC sites. They must also protect and conserve priority habitats and species that sit outside of the SINC network, with reference to the London Environment Strategy. 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: - Avoid damaging the significant ecological features of the site; - Minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site; - Deliver off-site compensation of better biodiversity value. D. Development proposals that have the potential to impact on designated international or national nature conservation sites 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. E. Development proposals should seek to secure Biodiversity Net Gain. 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. . Biodiversity should be fully integrated into the design-led approach with consideration given to the site context and its wider landscape setting	No HRA Implications This is a protective policy for biodiversity and sites of nature conservation within the borough. The policy states <i>“Development must not adversely impact on internationally designated nature conservation sites that are located outside of the Borough.”</i> This provides protection to all SAC/SPA and Ramsar sites within recreational catchment areas of the borough.

IPolicy	Description	Likely Significant Effects
	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 with biodiversity interests must submit an Ecological Assessment carried out by a 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. G. Planning conditions and/or legal agreements may be used to secure Management Plans where these are considered necessary to support nature conservation objectives. H. Development proposals that help to reduce deficiencies in the population's access to nature will be considered favourably.	
Policy GR 4 – Lewisham Links	A. 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, nature sites and other visitor destinations across the Borough. B. Development proposals must provide for public realm enhancements to support the delivery of the Lewisham Links where they are located adjacent to an existing or proposed route of the Lewisham Links, or where an existing or proposed route is located within the site. High quality public realm must be provided with reference to Policy QD3 (Public realm) and TR3 (Healthy streets and part of healthy neighbourhoods). The specific nature of public realm enhancements will be considered on a case-by-case basis and may include: - New or enhanced footpaths or cycleways; - Road realignment; - Street crossings or other safety measures; - Cycle parking including space for cycle hire; - External lighting; - Landscaping; - Tree planting or other green infrastructure; - Drinking water fountains;	No HRA Implications This policy is a development management policy regarding the level of affordable business units and the range of business units provided.

IPolicy	Description	Likely Significant Effects
	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.	
Policy GR 5 – Urban Greening and Trees	A. Development proposals must demonstrate how the design-led approach has been used to maximise opportunities for urban greening. This includes the integration of high quality and species diverse landscaping, wildlife habitat, green roofs and walls and Sustainable Drainage Systems. They must be designed with consideration given to the site context 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 must increase green cover on site to achieve the recommended target Urban Greening Factor (UGF) in the London Plan, unless it can be suitably demonstrated that this is not 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 green roofs and walls. Major development proposals will be expected to demonstrate that the feasibility of integrating these measures has been fully investigated, and minor development proposals are strongly encouraged to incorporate them. Green roofs and walls will be supported where they are appropriately designed, installed and maintained. Development proposals 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.	No HRA Implications This policy regards protecting the environment and ensuring development improves green infrastructure.

IPolicy	Description	Likely Significant Effects
	E. Development proposals 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). They should also maximise opportunities for additional tree planting particularly in urbanised locations such as streets and town centres. Development proposals must demonstrate that 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 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. F. Development proposals should avoid, and the Council will strongly resist, the removal of protected trees (i.e. those covered by a Tree Protection Order and trees within Conservation Areas) and developments that will have a detrimental impact on the health of protected trees and visual amenity provided by them. 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.	

IPolicy	Description	Likely Significant Effects
Policy GR 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.	No HRA Implications This is a policy about protecting allotments there would be no likely significant effect from this.
Policy GR 7 – Geodiversity	A. 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; b. Designating a Locally Important Geological Sites at Old Gravel Pit, Blackheath and Buckthorne Cutting, Crofton Park; and c. Ensuring development proposals make a positive contribution to the protection and enhancement of designated geodiversity sites and other sites of geological interest.	No HRA Implications This policy is about protecting geodiversity within the borough, there would be no likely significant effect from this.
Policy SD 1 – Responding to 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 all development proposals must: a. Help Lewisham to become a net zero-carbon Borough as part of a net zero-carbon London; b. Protect and maximise opportunities to enhance the network of green and open spaces, as well as improve linkages to and between them; c. Conserve sites of importance for biodiversity, protect habitats and species within the local ecological network, and deliver biodiversity net gain; d. Implement measures to reduce flood risk and ensure resilience against the impact of flooding, and seek to improve the quality of water bodies; e. Not adversely impact on the amenity of the local population and habitats, ;	No HRA Implications This policy regards ensuring the borough functions sustainably with regards to the climate emergency

IPolicy	Description	Likely Significant Effects
	f. Help London to achieve waste net self-sufficiency by applying the waste hierarchy and circular economy principles. C. A plan, manage and monitor approach will be used to support the successful transition to a net zero-carbon Borough. This approach will help to ensure that the Local Plan reflects current national and regional planning policy requirements and standards for carbon management, along with the Council's latest technical studies and strategies to deliver low and zero carbon outcomes.	
Policy SD 2 – Sustainable Design	A. Development proposals 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, including consideration of the construction and operation 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 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, 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	No HRA Implications This policy regards ensuring developments will be designed and constructed in a sustainable way.

IPolicy	Description	Likely Significant Effects
	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. E. Development proposals for major residential domestic refurbishment 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. 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. G. Where planning consent is required, sustainable retrofitting measures to existing buildings and other development will only be supported where other Local Plan policies are satisfied, including on the historic environment and heritage assets.	
Policy SD 3 – Minimising Greenhouse Gas Emissions	A. To help Lewisham to become a net zero-carbon Borough development proposals must be designed to reduce greenhouse gas emissions in operation and minimise energy demand (annual and peak) in accordance with the London Plan energy hierarchy. B. Major development proposals must be net zero-carbon and: - Meet the minimum on-site reduction of carbon emissions required by the London Plan; - Calculate and minimise emissions from any part of the development that are not covered by Building Regulations (e.g. unregulated emissions). C. Where it is clearly demonstrated that the net zero-carbon target cannot be achieved on-site, development proposals must make contributions to meet the identified shortfall through: - A cash-in-lieu contribution to Lewisham's carbon offset fund; and/or	No HRA Implications This is a positive policy for the environment to reduce gas emissions and to progress towards carbon neutrality.

IPolicy	Description	Likely Significant Effects
	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. E. Details of the approach used to meet the net zero-carbon target should be clearly set out in an Energy Strategy submitted as part of the Sustainable Design Statement. 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.	
Policy 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 Energy Masterplan. For large-scale schemes such as major developments, applicants 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. B. Development proposals should prioritise connection to decentralised heat networks. Major development proposals must provide a Feasibility Assessment for connecting to, and if possible extending or interconnecting, existing or planned future heat networks located on or in proximity to the site. Proposals for minor new-build development, conversions and building alterations must demonstrate that they have investigated and maximised opportunities to connect to existing heat networks. C. Where a decentralised heat network is planned or likely to be delivered in the future, development proposals should be designed to enable a cost-effective connection to it, having regard to Heat Network Priority Areas of the London Heat Map and energy masterplans.	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	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 London Plan heating hierarchy 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 other options in the heating hierarchy have been fully investigated and are not feasible, and there will be no adverse impact on air quality. Air Quality Assessments 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 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. H. Where site-wide communal and district heating systems are operational, heat and energy service providers are encouraged to enter into customer charters with domestic and small business customers.	
Policy SD 5 – Managing Heat Risk	A. Development proposals must minimise the adverse impacts on the urban heat island through the design of buildings and spaces, as well through the use of materials and urban greening measures. B. All new development must be designed to reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the London Plan cooling hierarchy. Development proposals will only be supported where there is	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	sufficient evidence to demonstrate that priority has been given to the implementation of feasible measures at the higher level of the hierarchy. C. Major development proposals must submit an Energy Statement to demonstrate how they will meet the requirements of (A) and (B) above. D. Major development proposals incorporating public realm, including amenity and open space, should be designed to create a comfortable environment in the public realm through the provision of shade and other passive cooling measures, giving priority to urban greening measures.	
Policy SD 6 – Improving Air Quality	A. Poor air quality is a significant public health issue in Lewisham. All new development must use the design-led approach and integrate on-site measures to improve air quality and prevent or minimise the population's exposure to poor air quality, having regard to Lewisham's Air Quality Management Plan. B. Development proposals must: : - Seek to improve air quality and be at least air quality neutral; - Not lead to a further deterioration of existing poor air quality; - Not create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; and - Not create unacceptable risk of high levels of exposure to poor air quality. C. Air Quality Assessments must be submitted with proposals for: - Major development; - 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 - Community infrastructure or other uses (including public open space) that are likely to be used by large numbers of particularly vulnerable groups, such as older people and children and young people.	No HRA Implication This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	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, or subsequent guidance. 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 (A) and (B) above will be refused unless it can be suitably demonstrated that adverse impacts can be mitigated to an acceptable level. Mitigation should be provided on-site. In exceptional circumstances where it is demonstrated that on-site mitigation is not feasible, off-site provision may be acceptable where equivalent air quality benefits will be delivered in the area affected by the development.	
Policy SD 7 – Minimising and Managing Flood Risk	A. The Council will work in partnership with stakeholders to implement the Thames Estuary 2100 Plan. To minimise and manage flood risk development proposals must: a. Apply a sequential approach to the location of new development to avoid flood risk to the population and property whilst taking account of the long-term impact of climate change, b. Not increase flood risk and reduce the risk of flooding from all sources; c. Make space for water by providing an undeveloped setback from rivers and other watercourses; d. Where appropriate, carry out a condition survey of flood defence and other watercourse infrastructure and if necessary, provide for maintenance, repairs or remediation to secure its functional integrity 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 e. Be designed to remain safe and operational under flood conditions. 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 FRA must provide sufficient information for the Council to assess	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	whether the requirements of the Sequential and Exception Tests have been satisfied. The FRA must: - Be proportionate with the degree of flood risk posed both to and by the development; - Take account of all potential sources of flooding both on and off-site; - Make an appropriate allowance for the hazard posed by climate change over the lifetime of the development; and - 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 they must be designed to should ensure that: - The most vulnerable land uses are directed to areas of the site that are at lowest risk of flooding; - 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; - There is no detrimental impact on the natural function of the floodplain and floodwater flow routes across the site; and Appropriate mitigation measures are incorporated to address any residual flood risk, including safe access and egress for all likely users of the development. D. Development proposals must provide a site-specific Flood Emergency Response Plan to manage actual and/or residual flood risk, where appropriate.	
Policy SD 8 – Sustainable Drainage	A. Development proposals should be located and designed having regard to the London Sustainable Drainage Action Plan, the Council's Surface Water Management Plan and Local Flood Risk Management Strategy; B. Development proposals must achieve greenfield runoff rates and ensure that surface water runoff is managed as close to its source as possible, in line with the London Plan drainage hierarchy. Proposals for major development and development in a Critical Drainage Area must submit a Drainage Strategy.	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	C. Sustainable Drainage Systems (SuDS) should be integrated into development wherever possible with priority given to green and blue over grey measures. All SuDS must meet the Department for Environment, Food and Rural Affairs Non-Statutory Technical Standards and be designed in accordance with the latest Construction Industry and Research Association (CIRIA) SuDS Manual or equivalent. Development proposals must demonstrate that SuDS will function effectively over the lifetime of development. 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. E. Where it is clearly demonstrated that a greenfield runoff rate cannot be achieved or SuDS cannot be implemented due to reasons of feasibility, development proposals must: - Ensure that surface water runoff (both in terms of volume and flow) has been reduced as much as reasonably practical; and - Investigate and integrate measures to improve water quality. F. Development proposals should be designed to include permeable surfaces wherever possible. Proposals for impermeable surfacing, including on front gardens, driveways, and car parks, will be refused unless it can be suitably demonstrated that this is unavoidable.	
Policy SD 9 – Lewisham's Waterways	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: - 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	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	f. Potential to facilitate water transport, for both passengers and freight. B. Development proposals on sites containing or adjacent to a main river, ordinary watercourse or other water space 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. 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. C. 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. 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).	

IPolicy	Description	Likely Significant Effects
	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. Development proposals involving water transport at Convoys Wharf will be supported where they comply with London Plan policy SI15 (Water transport), along with other relevant policies. F. Development proposals 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: - Are demonstrably a water-dependent use; - Are appropriately located and designed, taking into account the nature and scale of the proposed use; - 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; - Do not have a detrimental impact on river navigation and flood defence infrastructure; - Do not have a detrimental impact on the environment, including water quality in line with (B) above; - Do not impede or compromise existing public access points to the waterway, and extend or enhance access wherever possible; and - Ensure adequate access and servicing arrangements for all intended users of the development.	
Policy 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: - Makes provision for infrastructure that is required within the Borough as demonstrated by an asset management or similar investment plan; - Will not result in an unacceptable adverse impact on the environment, human health, public safety, amenity and local character; and - Will be constructed in a timely and sustainable manner. B. Development proposals should have regard to Drainage and Wastewater Management Plans (DWMPs) and must demonstrate that the local water supply	

IPolicy	Description	Likely Significant Effects
	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 occupation. A Water Supply and/or Drainage Strategy may be required to demonstrate that suitable arrangements are in place to serve the development. C. Development proposals should ensure the separation of surface and foul water systems, including by rectifying misconnections. Proposals should prioritise mains foul drainage and 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 the most sustainable drainage options must be implemented, as supported by a Drainage Strategy. 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. Development proposals within a Source Protection Zone will only be supported where there is no risk of contamination to groundwater sources, or if a risk is identified, it is suitably demonstrated that adequate mitigation measures will be implemented. 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.	
Policy SD 11 – Ground Conditions	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.	No HRA Implications

IPolicy	Description	Likely Significant Effects
	B. Development proposals must demonstrate that any risks associated with land contamination, including to human health, public safety and the environment will be adequately addressed in order to make the development safe. C. Development proposals on land which is suspected of being contaminated or potentially contaminated, or if a sensitive use is proposed, 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: - Undertake a Site Intrusive Investigation (Phase 2 Study) to provide a detailed assessment of contamination and risks to all receptors; - Prepare a Risk Management and Remediation Strategy appropriate to the individual site circumstances; and - Submit a Verification Plan and Closure Report prior to the occupation of the development.	This policy is a development management policy which sets criteria by which proposals must demonstrate for support.
Policy SD 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 must apply the waste hierarchy and follow circular economy principles, in line with Policy SD 13 (Design to support the circular economy). B. To help London achieve waste net self-sufficiency, meet the Borough's strategic waste apportionment target and other requirements, including the London Mayor's recycling and composting targets, the Council will work in partnership with stakeholders including the South East London Joint Waste Planning Group. The following are strategically safeguarded waste sites in Lewisham: - South East London Combined Heat and Power (SELCHP) energy recovery facility, New Cross - Recycling Centre (HTL Waste Management Services), New Cross - 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	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	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: - They are required within the Borough to meet an identified strategic need, having regard to the proximity and self-sufficiency principles; - 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; - 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; - They achieve a positive carbon outcome or demonstrate that steps are in place to meet the minimum greenhouse gas performance target, in line with London Plan policy SI8 (Waste capacity and net waste self-sufficiency); and - 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 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. 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.	

IPolicy	Description	Likely Significant Effects
Policy SD 13 – Design to Support the Circular Economy	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. 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 London Plan policy SI7. C. Development proposals 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. They must make provision for: - 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; - Safe and convenient access to storage facilities, both for building occupiers and collection services; - Well sited and designed development that avoids and mitigates adverse impact on the amenity of building occupiers and neighbouring site users and uses; and - Separate provision for commercial and household waste where mixed-used development is proposed. E. All proposals for new multi-storey development, including flatted residential development, must also make provision for sensitively designed storage and collection systems at each floor unless it is suitably demonstrated that other designs can appropriately service the development. Proposals should avoid the use of forecourts or ground floor internal waste storage where this may adversely impact on the amenity of the building's occupiers and surrounding properties F. Where public realm is included as part of a development proposal appropriate provision for recycling and waste disposal facilities will be required. Provision	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	should be sensitively located and designed 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.	
Policy 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 must make the most effective use of land and optimise the capacity of sites by taking into account connectivity and access to existing and planned future public transport. Priority should be given to reducing car use and both promoting and enabling movement by walking, cycling and the use of public transport. B. Development proposals 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. 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. Development 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 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; c. The use of the River Thames for passenger-based transport; and d. Expansion of cycle hire. E. Development proposals should use the design-led approach to maximise opportunities to remove barriers to access and introduce measures that encourage	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	and enable movement by walking and cycling. They must address the movement and connective function of the public realm along with its place qualities 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 walking and cycling transport infrastructure, <u>deliveries and servicing</u>, 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 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 London Plan Policy T4 (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	

IPolicy	Description	Likely Significant Effects																										
	avoid excessive strain on the transport network and to ensure additional infrastructure demands arising from the development (including for community and green infrastructure) can be appropriately accommodated. <table><tr><th>Scheme</th><th>Timeframe</th></tr><tr><td colspan="2">Public transport</td></tr><tr><td>Bakerloo line extension</td><td>Medium</td></tr><tr><td>Lewisham Station and interchange</td><td>Short to medium</td></tr><tr><td>Brockley Station and interchange</td><td>Medium</td></tr><tr><td>Surrey Canal Road Station</td><td>Short to medium</td></tr><tr><td>'Metroisation' of London Overground services</td><td>Short to medium</td></tr><tr><td colspan="2">Healthy streets and active travel</td></tr><tr><td>A2 New Cross Road / Amersham Gyratory removal</td><td>Short</td></tr><tr><td>A21 Healthy Streets Corridor ('Lewisham Spine')</td><td>Short to medium</td></tr><tr><td>A205 (South Circular) Re-routing (Catford)</td><td>Short</td></tr><tr><td>Ringway Corridor (Southend Land and Whitefoot Lane)</td><td>Medium</td></tr><tr><td>Healthy Neighbourhoods</td><td>Short to medium</td></tr></table>	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	'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	
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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																											
Policy TR 2 – Bakerloo Line Extension	A. The Bakerloo line extension is fundamental to improving public transport access as well as supporting growth and regeneration in Lewisham and London. The Council will work in partnership with stakeholders to secure the timely delivery of the BLE in accordance with the 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 sites in proximity to the BLE. B. Development proposals must demonstrate that they will facilitate and not preclude the delivery of the BLE, with reference to Policy TR1 (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	No HRA Implications This policy is ensuring that no development consented by Lewisham will prejudice the delivery of the Bakerloo Line Upgrade and Extension. However, Lewisham does not have development control over the extension itself.																										

IPolicy	Description	Likely Significant Effects
	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 BLE, <u>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.</u> Development proposals must also be designed to optimise the accessibility provided by the introduction of the BLE into the local area. This may include provision for new or improved public realm and transport infrastructure enhancements. D. Development proposals should optimise the use of land and capacity of sites taking into account the BLE and future improvements to Public Transport Access 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.	
Policy TR 3 – Healthy Streets as Part of Health 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 enable movement by walking, cycling and public transport, so they become people's preferred choice of travel in Lewisham. B. Development proposals must demonstrate how they have applied the London Plan Healthy Streets Approach and Indicators through the design-led approach. All major development proposals 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 to deliver public realm and other improvements that support walking, cycling and the use of public transport. Cycle	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	infrastructure must be designed in accordance with the London Cycling Design Standards. C. The Healthy Streets Approach will 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 Public Transport Access Levels and areas experiencing higher levels of deprivation. Development proposals must have regard to relevant guidance that supports corridor improvements, including the Council's A21 Development Framework. D. Development proposals must safeguard and contribute to maintaining and enhancing the Borough's network of walking routes and cycleways, including the Thames Path, South-East London Green Chain, Waterlink Way 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 proposals that adversely impact on the safety, quality and convenience of the Borough's network of walking routes and cycleways, and associated infrastructure (including dedicated cycle parking provision), will be 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 dominance and enhance 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 easy to access and designed in accordance with the London Cycling Design Standards. These facilities should be provided at a level that is commensurate with the nature and scale of development and the	

IPolicy	Description	Likely Significant Effects
	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 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. 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.	
Policy TR 4 – Parking	A. A carefully managed approach to parking, and particularly car parking, will be taken to support the delivery of inclusive, healthy, safe, liveable and sustainable neighbourhoods. 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 be supported where it can be suitably demonstrated that: - The development is appropriately located at a well-connected location with good walking and cycling access to local amenities and services; or - 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 about attractive conditions for walking and cycling and improve access to local amenities and services; and - There is an existing Controlled Parking Zone (CPZ), or a future CPZ can be established through planning contributions;	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	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 area to cater to the additional demand arising from the development, taking into account existing and planned transport infrastructure; e. ; C. Development proposals must not exceed the maximum car parking standards set out in the London Plan, including for: a. Residential parking; b. Office parking; c. Retail parking; and d. Hotel and leisure uses parking (including consideration of coach parking). 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. E. Development proposals must make provision for high quality and fit-for-purpose cycle parking in accordance with the London Cycling 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. F. Major development proposals, development proposals located within town centres and employment areas, or other developments likely to generate a significant number of visitors should integrate dedicated space for cycle hubs to accommodate provision of cycle parking including for cycle hire schemes 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.	

IPolicy	Description	Likely Significant Effects
	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. 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. I. Where car parking is appropriate, a minimum of 20 per cent of total car parking spaces provided on-site must have active provision of charging points for electric or Ultra-Low Emission vehicles, with 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. J. Parking Design and Management Plans (PDMPs) must be submitted with 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. K. Development proposals for residential and commercial uses will be expected to investigate opportunities to implement rapid charging points, having regard to the Council's Low Emissions Vehicle Charging Strategy. Surface-level car parking should be designed to be permeable, with reference to Policy SD8 (Sustainable drainage).	
Policy TR 5 – Deliveries, Servicing and Construction	A. Development proposals should facilitate sustainable freight, where possible, through water, rail, and road including for 'last-mile distribution'. They must also facilitate and enable safe, clean and efficient delivery and servicing for all of the 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 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.	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	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 larger developments 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). Proposals must provide evidence to demonstrate that the provision is appropriate to location, nature and scale of commercial or industrial use. 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 major developments and other developments which 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.	

IPolicy	Description	Likely Significant Effects
Policy 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, 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 amenity and the highway network, including existing on-street parking provision; d. Walking routes and cycleways will not be adversely impacted, particularly where these are used for access to bus stops, station entrances and other public transport services; e. The development, is of a high quality 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 London Plan. A. Development proposals will be assessed having regard to the cumulative impact of facilities for taxis and private hire vehicles in the locality and the 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.	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.
Policy TR 7 – Digital 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. B. In line with London Plan Policy SI6 (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 development, along with meeting the expected demand for mobile connectivity generated by the	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	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 areas and town centres. Proposals must have regard to Lewisham's Infrastructure Delivery Plan and other relevant information on broadband coverage. Infrastructure and equipment design D. Development proposals for digital connectivity infrastructure and associated equipment will only be supported where it can be suitably demonstrated that: - The infrastructure and equipment is the minimum needed to meet operational requirements, having regard to future demand or planned improvements; - Opportunities for infrastructure and equipment sharing have been fully investigated and taken into account; - There will be no significant adverse impact on the visual amenity of the occupiers of the host building, where relevant, and neighbouring occupiers; - There will be no adverse impact on open space and biodiversity; - If located on a main road or walking route, a minimum residual footway is provided; - 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 - The infrastructure and equipment is sensitively located and appropriately designed, and does not detract from local area character, having particular regard to: - The need to preserve or enhance the significance of heritage assets, including Listed Buildings and conservation areas; - 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	

IPolicy	Description	Likely Significant Effects
	iii. The cumulative impact of telecommunications installations on a structure, site or area. E. In order to minimise visual impact all 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.	
Policy LCA 1 – Central Area Place Principals	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. B. Development proposals must help to ensure the Central Area benefits from a high quality network of walking routes and cycleways that connect neighbourhoods and places, including green spaces and waterways, with reference to Policy GR4 (Lewisham Links). C. Staplehurst Road and Hither Green Lane are designated as Local Centres reflecting the role they play in the provision of local services and community facilities, along with their accessible location near Hither Green station. To help secure the long-term viability of the Local Centres, development proposals should: - Address severance caused by the railway and improve access to and along the station approaches and the Local Centres through public realm enhancements that make walking routes, cycleways and station entrances (including at Springbank Road) safer and more legible; - 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 - Facilitate the renewal of non-designated employment sites in proximity to the station to secure a complementary mix of commercial and other uses. 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 will be supported where this responds positively to the area's local and historic character.	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	E. The river valley network is a defining feature of the Central Area which development proposals must respond positively to by: - Ensuring that development is designed to improve the ecological quality of the Ravensbourne and Quaggy rivers, including by naturalising the rivers, wherever opportunities arise; - Ensuring the layout and design of development gives prominence to the rivers and the river valley, and enhances their amenity value, including by better revealing them; - 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 cycleways that enhance access to the river from the town centres of Lewisham and Catford, and the A21 Corridor, will be strongly supported. - Designing development with reference to the River Corridor Improvement plan.	
Policy LCA 2 – Lewisham Major Centre and Surrounds	A. Continued investment in Lewisham Major Centre to enable its future designation as a Metropolitan Centre of sub-regional significance in London 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 deliver a complementary mix of main town uses, along with new housing, whilst ensuring that the centre's predominant commercial role is maintained and enhanced. B. Development proposals will be required to help facilitate, and must not prejudice, the delivery of 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, as well as new and improved walking routes and cycleways. Further requirements are set out in Policy TR1 (Sustainable transport and movement) and the site allocation policies for the Central Area.	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	C. Development proposals should respond positively to the evolving urban character of the centre and its surrounds. They must be designed with 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 must be designed to provide an appropriate transition in bulk, scale, massing, height and character from residential neighbourhoods around the centre, the edges of the centre and the centre's commercial core, with generous setbacks provided along the Ravensbourne and Quaggy rivers, main roads and other corridors for movement. D. Development proposals must contribute to enhancing the public realm by applying the Healthy Streets Approach. They should promote and enable movement by walking, cycling and the use of public transport in order to make the town centre a significantly more accessible, safer, healthier and attractive 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 commercial destinations, public transport nodes, 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 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 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 proposals should make provision for attractive and robust embankments as an integral feature of the design, particularly along the River Ravensbourne in order to enhance connections from Silk Mills Path to Lewisham	

IPolicy	Description	Likely Significant Effects
	transport interchange and the Lewisham Gateway site, leading to the town centre and the Primary Shopping Area. G. Lewisham market 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 night-time economic activities will be supported where they 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 positive frontages with active ground floor frontages 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. Development must reinforce or create a positive relationship with the public realm 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 Major Centre maintains its role as one of the Borough's principal commercial and employment locations, development proposals must retain or re-provide existing workspace, and deliver net 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 E(g) uses, including hybrid workspace combining office and light industrial uses appropriate to	

IPolicy	Description	Likely Significant Effects
	the area. Provision of workspace suitable for small and independent businesses, including units of 500 square meters or less, will be strongly encouraged.	
Policy LCA 3 Catford Major Centre and Surrounds	A. Reinforcing the role of Catford Major Centre as Lewisham's principal civic and cultural hub is 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 deliver a complementary mix of main town centre uses, 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 the Catford Town Centre Framework and where appropriate, site allocation policies. C. The realignment of the South Circular (A205) at Catford Major Centre will be facilitated through the Local Plan and delivered through a partnership approach with Transport for London and other key stakeholders. The road realignment will enable the comprehensive regeneration of the town centre and enhance the liveability of its surrounding neighbourhoods. Development proposals must maximise opportunities presented by the road realignment to make provision for safe movement along and across the South Circular and its junction at Rushey Green (A21), new and improved public realm and high quality, publicly accessible open spaces. D. Development proposals should respond positively to the evolving urban character of the town centre and its immediate surrounds. Development must be designed to provide for an appropriate transition in scale, bulk, mass, height and character from 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 promote and enable movement by walking, cycling and the use public transport to make the town centre a significantly	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	more accessible, safer, healthier and attractive 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, commercial, civic and cultural destinations, public transport nodes, public open spaces and residential areas. Particular consideration will need to be given to 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). F. Development proposals must respond positively to the historic and cultural character of the town centre and its surrounds whilst preserving or enhancing the significance of heritage assets, including by: - 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; - 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 - Addressing the relationship of new development with the Culvery Green Conservation Area to the south. G. Development proposals must respond positively to the distinctive character of the Broadway and the buildings of townscape merit along it. They should reinforce and enhance the function of the Broadway as a key movement corridor by walking and cycling as well as a focal point of community and commercial activity. H. Development proposals 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 proposals should make provision for attractive and robust	

IPolicy	Description	Likely Significant Effects
	embankments as an integral feature of the design to enhance connections to town centre's western gateway, Ladywell Fields and the train stations. I. Catford market 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 night-time economic activities should help to reinforce Catford's role as an important cultural destination, and will be supported where they contribute 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 positive frontages within the town centre and at its edges with active ground floor frontages along Rushey Green, The Broadway and within the Primary Shopping Area.. Development must reinforce or create a positive relationship with the public realm at the street or ground floor level, and where appropriate, podium levels of buildings. Catford Major Centre is a key commercial and employment location. It has a unique civic and cultural function that distinguishes it from, and helps to complement, Lewisham Major Centre. Development proposals must retain or re-provide existing workspace and deliver net 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 E(g) uses, including office floorspace and hybrid workspace combining office and lighter industrial 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.	
Policy LCA 4 – A21 Corridor	A. The transformation of the A21 Corridor (Lewisham High Street, Rushey Green and Bromley Road) and its immediate surrounds into a network of liveable and healthy neighbourhoods with a distinctive urban character is integral to the delivery of the	No HRA Implications

IPolicy	Description	Likely Significant Effects
	spatial strategy. Development proposals must demonstrate how they have responded positively to the A21 Development Framework through the design-led approach. B. Development proposals along the A21 Corridor and its immediate surrounds must contribute to enhancing the place qualities of the corridor by: - Responding positively to the evolving urban character of the area through the sensitive intensification of sites, where appropriate; - Helping to establish a distinctive and legible urban grain along and around the Corridor, including clusters of development of an urban scale situated at major road junctions; - Ensuring new development reinforces or creates a positive relationship with the public realm, including through the provision of positive frontages along the Corridor, and active ground floor frontages incorporating commercial and community uses, where appropriate, particularly in town centres and edge-of-centre locations; - Maximising opportunities to integrate tree planting and other urban greening measures; and - Enhancing connections between the Major Centres of Catford and Lewisham, as well as neighbourhoods surrounding the Corridor, 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 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 and cycleways that link with it to enhance connections between neighbourhoods and places, including open spaces such as Ladywell Fields, Lewisham Park, 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 Corridor, and the river valley, particularly where sites are to be delivered through comprehensive redevelopment.	This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
Lewisham Central Site Allocations	See Appendix C	Potential HRA Implications requiring further investigation of likely significant effects in the body of the report An increase in residential, commercial or industrial/business development has the potential to cause likely significant effects upon European designated sites should the developments be within the Zone of Influence of the site. Potential Impact pathways include: • Recreational pressure • Water quality and resources • Air quality
Policy LNA 1 – North Area Place Principals	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. Development proposals must help to ensure the North Area benefits from a high quality network of walking routes and cycleways that connect neighbourhoods and places, including green spaces and waterways, having regard to Policy GR4 (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. C. Development proposals 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, the barriers to movement around and across other major roads, including New Cross Road and Evelyn Street (A200) and the wall at Leeway adjacent to Convoys Wharf.	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	D. Heritage-led regeneration will be vital to delivering high quality and distinctive neighbourhoods across the North Area. Development proposals 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 local character and identity, particularly where sites are delivered through comprehensive 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 High Streets at Deptford and New Cross. E. Development proposals must respond positively to the River Thames and Deptford Creek with reference to Policy LNA4 (Thames Policy Area and Deptford Creekside). They must maximise opportunities to improve the ecological quality and amenity value of these waterways, including by creating or enhancing walking routes and cycleways to and along the waterfront, particularly the Thames Path and Waterlink Way at Deptford Creek. F. Development proposals must respond positively to the historic and cultural character of New Cross and Deptford District Centres. A wide range of commercial, cultural and community uses will be supported within the centres to support their vitality and long-term viability as well as to expand their role as key nodes of employment activity within the Creative Enterprise Zone. 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, 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 District Centre and will be protected as an important commercial destinations and visitor attractions. Development proposals should assist in securing the long-term viability	

IPolicy	Description	Likely Significant Effects
	of the market by protecting and enhancing its amenity, delivering public realm and access improvements, and making appropriate provision of space and 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. Where relevant, development proposals must demonstrate how they have responded positively to the New Cross Area Framework and Surrey Canal Triangle SPD through the design-led approach.	
Policy LNA 2 – New Cross Road / A2 Corridor	A. The transformation of the New Cross Road / A2 Corridor and its immediate surrounds into a 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 proposals must demonstrate how they will make the optimal use of land to support the delivery of a high quality, lively and thriving High Street whilst reinforcing and enhancing the Corridor's movement function B. Development proposals along the New Cross Road / A2 Corridor and its surrounds must enhance the place qualities of the Corridor by: - Responding positively to heritage assets, including the historic character and urban grain of New Cross Road and its wider setting; - Reinforcing the predominant commercial function and distinctive identity of the High Street, taking opportunities to introduce a wider and richer mix of uses into the area; - Enhancing the continuity of the High Street 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;	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	d. Improving relationships between the north and south sides of New Cross Road to create a more cohesive High Street, 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 Corridor 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 Corridor and its surrounds as a more liveable and healthy neighbourhood, including through the sensitive intensification and renewal of sites. h. Ensuring development will not result in an unacceptable routing or volume of cars and other vehicles into 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. This principal east-west route should be supported by a complementary network of legible, safe and accessible walking routes and cycleways that link with it to enhance connections between neighbourhoods and places. This includes connections to Deptford and New Cross District Centres, New Cross and New Gate stations, Goldsmith's College and open spaces in the surrounding area, such as Bridgehouse Meadows, Fordham Park and Folkestone Gardens. Development proposals 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 partnership with the Mayor of London / Transport for London and other stakeholders to deliver 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. Public realm enhancements designed to rebalance transport modes along New Cross Road with priority given to walking and cycling, including by widening pavements and reducing pinch-points; and	

IPolicy	Description	Likely Significant Effects
	c. Improvements at key junctions to enhance safety for all road users, including at the Amersham gyratory.	
Policy LNA 3 – Creative Enterprise Zone (SHAPESLewisham)	A. A Creative Enterprise Zone 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 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 SIL and MEL located at the convergence of Grinstead Road and Trundleys Road 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 District Centres, including evening and night-time economic activities; and 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 development proposals protect existing industrial capacity and contribute to making provision for flexible workspace and facilities in	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	suitable locations, at an appropriate range of rents. Development proposals will be considered favourably where they incorporate low-cost and an appropriate amount of affordable workspace, particularly space catered to micro, small and medium sized businesses, including start-ups and independents; b. Ensuring new development proposals are designed to enable full-fibre digital connectivity, or equivalent infrastructure, to all end users; c. Encouraging the temporary use of vacant buildings and sites for 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 Class E(g) office and light industrial and Sui Generis business space that is currently occupied or suitable for use by the creative and cultural industries, including artists workspace, will be strongly resisted. Development proposals involving the loss or change of use of type of workspace will only be permitted where they: a. Ensure that an equivalent amount of 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 Class E(g) office and light industrial workspace for uses in the creative and cultural industries, and demonstrate that reasonable efforts have been made to retain or re-provide such existing provision; and c. Retain existing and make provision for new affordable workspace, in line with Policy EC4 (low-cost and affordable workspace).	

IPolicy	Description	Likely Significant Effects
Policy LNA 4 – Thames Policy Area and Deptford Creekside	A. Development proposals must respond positively to the distinctive character the River Thames and Deptford Creek. They must also support and seek to maximise the multifunctional social, economic and environmental functions and benefits of the watercourses, with reference to Policy SD9 (Lewisham's waterways). B. Development proposals on sites within the designated Thames Policy Area, and adjacent to Deptford Creek, must address the watercourse as an integral part of the design-led approach. They should help to reinforce and enhance the site's relationship with the River Thames and Deptford Creek, including by: c. Maintaining and enhancing the ecological quality and nature conservation value of the river or creek and its corridor, including the walls and foreshore; d. 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; e. 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; f. Maintaining the stability of the flood defences and investigating opportunities to retreat flood defences, particularly to increase flood storage, enhance biodiversity, and create or improve visual connections with the river or creek; g. Resisting encroachment into the creek or river and foreshore; h. 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	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	i. Ensuring development does not adversely impact on the amenity of uses within industrial areas and safeguarded wharves, in line with the Agent of Change. 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.	
Lewisham North Site Allocations	See Appendix C	Potential HRA Implications requiring further investigation of likely significant effects in the body of the report. An increase in residential, commercial or industrial/business development has the potential to cause likely significant effects upon European designated sites should the developments be within the Zone of Influence of the site. Potential Impact pathways include: • Recreational pressure • Water quality and resources • Air quality
Policy LEA 1 – East Area Principles	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, with reference to Policy HE2 (Designated heritage assets).	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	C. Development proposals must respond positively to the historic and village character of Blackheath District Centre 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 the transformation of the South Circular (A205), Lee High Road (A20), Burnt Ash Road/Baring Road (A2212) and Lee Road (A212) by applying the Healthy Streets Approach in accordance with Policy TR3 (Healthy streets as part of healthy neighbourhoods). They must be designed to create or enhance walking routes and cycleways through the provision of public realm improvements, positive frontages and active ground floor frontages along the roads, where appropriate. E. The redevelopment and intensification of sites within the Lee Green District Centre and 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. G. Lee Station is designated a Local Centre 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 centre, development proposals should:	

IPolicy	Description	Likely Significant Effects
	a. Be designed to enhance the character of the townscape, access to and along the station approach and the centre, including by improving shopfronts, public realm and the legibility of walking routes and cycleways; and b. Facilitate the renewal of employment sites in proximity to the centre and station to secure a complementary mix of commercial uses and modern workspace. H. The sensitive intensification of established residential neighbourhoods will be supported where new development proposals respond positively to their distinctive local character, including the landscape setting. Development proposals must have regard to the Small Sites Guidance SPD, where appropriate. I. Opportunities should be taken to direct new investment to the Grove Park neighbourhood with reference to Policy LEA3 (Strategic Area for Regeneration, Grove Park). Development 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 must contribute to protecting and enhancing this network of green infrastructure, with reference to Policy LEA4 (Linear network of green infrastructure). K. Development proposals must help to ensure the East Area benefits from a high quality network of walking routes and cycleways that connect neighbourhoods and places, including green spaces and waterways, with reference to Policy GR4 (Lewisham Links). L. The River Quaggy is a defining feature of the East Area which development proposals must respond positively to. Development proposals must maximise opportunities to improve the ecological quality and 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.	

IPolicy	Description	Likely Significant Effects
Policy LEA 2 – Lee Green District Centre and Surrounds	A. Development proposals must demonstrate how they will contribute to securing the long-term vitality and viability of Lee Green District centre, including by enhancing the place qualities of the centre as well as reinforcing its role as a key focal point for community activity in the East Area. Development proposals must contribute to a coordinated process of town centre renewal that responds positively to the area's distinctive character. They must also deliver a complementary mix of main town centre uses, along with new housing, whilst ensuring that the centre's predominant commercial and community role is maintained and enhanced. B. The comprehensive redevelopment of the sites at Leegate Shopping Centre, Sainsbury's Lee Green and the land at Lee High Road and Lee Road 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. C. Development proposals must contribute to enhancing the public realm by applying the Healthy Streets Approach. They should promote and enable movement by walking, 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, 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 character of the town centre and its immediate surrounds. Development should be designed to provide for an appropriate transition in scale, bulk, mass, height and character	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	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 positive frontages and active ground floor frontages within the town centre and at its edges. In order to ensure development 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 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.	
Policy 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 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).	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
Policy LEA 4 – Linear Network of Green Infrastructure	A. The East Area contains a linear network of green infrastructure that will be protected and enhanced. Development proposals 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 it's role as a vital environmental and recreational asset within the Borough and feature which contributes to the distinctiveness of the Blackheath, Lee and Grove Park neighbourhoods. 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, 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.	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	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.	
Lewisham East Site Allocations	See Appendix C	Potential HRA Implications requiring further investigation of likely significant effects in the body of the report. An increase in residential, commercial or industrial/business development has the potential to cause likely significant effects upon European designated sites should the developments be within the Zone of Influence of the site. Potential Impact pathways include: • Recreational pressure • Water quality and resources • Air quality
Policy LSA 1 – South Area Place Principles	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 within the South Area must demonstrate how they will help to tackle inequalities and the social, economic and environmental barriers that contribute to deprivation, in line with Policies LSA2 (Strategic Area for Regeneration) and LSA3 (Bell Green and Lower Sydenham). C. Development proposals must optimise the use of land taking into account the Bakerloo line extension and other infrastructure that will enable significant improvements to transport access 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	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	cope with the additional demands generated by new development, in line with other Local Plan policies. D. Development proposals must respond positively to distinctive and historic character of Southend Village and its surrounds. They should seek opportunities to enhance the unique place qualities, commercial and community functions of the Village, with reference to Policy LSA3 (A21 Corridor / 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, provision of community infrastructure and public realm improvements. The sensitive intensification of these neighbourhoods will be supported where new development responds positively to their distinctive local and historic character. This includes the predominant garden city and cottage estate character associated with the London County Council estates. F. Development proposals must respond positively to the role of Downham District Centre in supporting local neighbourhoods and communities, particularly for day-to-day shopping and service needs. A wide range of commercial, leisure, 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 suitable to accommodate main town centre uses, particularly for Class E retail uses; and b. Are designed to enhance the quality of the streetscape, townscape, and environment, including through the improvements to shopfronts and the public realm. G. Bellingham is designated a Local Centre 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 Corridor. To help secure the long-term vitality and viability of the centre, development proposals must be designed to:	

IPolicy	Description	Likely Significant Effects
	a. Improve access to and along the centre and station approach, including public realm enhancements that make walking routes and cycleways safer and more legible; b. Enhance the character of the area through townscape and streetscape improvements, including to shopfronts; and c. Facilitate the renewal of employment land at the southern end of Bromley Road SIL, particularly at the junction at Randlesdown Road. H. Development proposals must contribute to inclusive and mixed neighbourhoods and communities, including by protecting family housing and ensuring there is no harmful overconcentration of Houses in Multiple Occupation, with reference to Policy HO8 (Housing with shared facilities). I. Development proposals must help to ensure the South Area benefits from a high quality network of walking routes and cycleways that connect neighbourhoods and places, including green spaces and waterways, with reference to Policy GR4 (Lewisham Links). They should maximise opportunities to enhance or introduce new cycleways, particularly in the established residential areas with wider street layouts. J. Public realm and access improvements should be introduced along the A21 Corridor / Bromley Road (including active frontages uses along the edge of the 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). 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. 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	

IPolicy	Description	Likely Significant Effects
	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. M. The river valley network is a defining feature of the South Area which development proposals 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.	
Policy 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:	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	i. Enhancing provision of and access to high quality public transport infrastructure, including bus services; ii. Addressing barriers to movement by enhancing the network of walking routes and cycleways connecting to transport nodes, town and local centres, schools and training facilities, and employment locations; 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; 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 between key stakeholders to secure the delivery of new and improved infrastructure, 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 site 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.	

IPolicy	Description	Likely Significant Effects
Policy 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 new development within the area supports the delivery of the spatial strategy for the Borough, the Council 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 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 in a coordinated manner, development proposals must: - Ensure that development will not prejudice the delivery of the Bakerloo line extension 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);; - Optimise the capacity of sites having regard to future improvements in Public Transport Access Levels enabled by the BLE and other transport infrastructure; - Deliver the comprehensive redevelopment of 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; - Protect the employment function of the LSIS at Stanton Square and Worsley Bridge Road, whilst exploring opportunities to deliver new high quality workspace, including through the co-location of employment and other compatible uses;	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	e. 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 roads, including the A212 (Sydenham Road, Bell Green Lane, Perry Hill), A2218 (Stanton Way, Southend Lane) and Worsley Bridge Road; f. Enable the reconfiguration, re-routing and/or redesign of roads where this is necessary to support the area masterplan: and 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. 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 to Sydenham town centre and new connections to Bellingham, over the Pool River where feasible; b. Integrating new publicly accessible open space into development; c. Responding positively to heritage assets and their setting, including the Livesey Hall War Memorial and gardens; and 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.	
Policy LSA 4 – A21 Corridor / Bromley Road	A. The transformation of the A21 Corridor (Bromley Road) and its immediate surrounds into a network of liveable, healthy neighbourhoods with a distinctive urban character is integral to the delivery of the spatial strategy. Development	No HRA Implications

IPolicy	Description	Likely Significant Effects
	proposals must demonstrate how they have responded positively to the A21 Development Framework through the design-led approach. B. Development proposals along the A21 Corridor and its immediate surrounds must contribute to enhancing the place qualities of the Corridor by: - Responding positively to the evolving urban character of the area through the sensitive intensification of sites, where appropriate; - Helping to establish a distinctive and legible urban grain along and around the Corridor, including clusters of development of an urban scale situated at major road junctions, particularly at Southend Lane; - Ensuring new development reinforces or creates a positive relationship with the public realm, including through the provision of positive frontages along the Corridor, and active ground floor frontages incorporating commercial and community uses, where appropriate, including at Southend Village and Downham District Centre; - Maximising opportunities to integrate urban greening measures; and - Enhancing connections between neighbourhoods along and surrounding the Corridor through the delivery of new and improved public realm. C. Development proposals 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: - Enhancing the place qualities of the Village by designing development to create a more coherent urban grain along Bromley Road; - Making provision for a complementary mix of main town uses within the parade,; and - Improving visitor access to Southend Village through public realm enhancements: - Around the junctions at Beckenham Hill Road and Southend Lane/Whitefoot Lane; - To and along Coninsborough Crescent; and - 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 by applying the Healthy Streets Approach. This	This policy is a development management policy which sets criteria by which proposals must demonstrate for support.

IPolicy	Description	Likely Significant Effects
	principal north-south route should be supported by a complementary network of legible, safe and accessible walking routes and cycleways that link with it to enhance connections between neighbourhoods and places, including open spaces such as Beckenham Place Park, Forster Park, and Downham Fields. 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 Corridor, and the river valley, particularly where sites are to be delivered through comprehensive redevelopment.	
Lewisham South Site Allocations	See Appendix C	Potential HRA Implications that require further investigation of likely significant effects in the body of the report. An increase in residential, commercial or industrial/business development has the potential to cause likely significant effects upon European designated sites should the developments be within the Zone of Influence of the site. Potential Impact pathways include: • Recreational pressure • Water quality and resources • Air quality
Policy LWA 1 – West Area Place Principles	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	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:

IPolicy	Description	Likely Significant Effects
	topography, is also a defining feature of the West Area, which was once covered by the Great North Wood. Development proposals 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 where this retains and enhances industrial capacity and local employment provision, as well as improves the quality of the environment and townscape. Development proposals within the LSIS must ensure the design provides for a positive relationship with Upper Sydenham/Kirkdale Local Centre, particularly to ensure the protection of amenity as well as to maximise opportunities to create safe and legible routes between and around the LSIS and the Local Centre. Development proposals 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 character, including the landscape setting. Development proposals must have regard to the Small Sites SPD, where appropriate. F. Development proposals must help to ensure the West Area benefits from a high quality network of walking routes and cycleways that connect neighbourhoods and places including green spaces and waterways, with reference to Policy GR4 (Lewisham Links). Consideration should be given to improving connections between 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 proposals within the	

IPolicy	Description	Likely Significant Effects
	vicinity of the museum should provide for public realm enhancements to improve way finding and access to and from the museum. H. Development proposals must contribute to delivery of high quality public realm using the Healthy Streets Approach. Particular consideration should be given to enhancements at station entrances and around their approaches and along key movement corridors including Ladywell Road, South Circular (A205), Sydenham Road, Dartmouth Road, Brockley Road/Brockley Rise, and Drakefell Road/Gellatly Road.	
Policy LWA 2 – Connected Network of Town Centres	A. The West Area contains an historic network of town centres that serve its neighbourhoods and communities. Development proposals 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 Kirkdale and Ladywell are designated as Local Centres 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 DM5 (Meanwhile uses).	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support

IPolicy	Description	Likely Significant Effects
	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 District Centre will be supported in order to secure its long-term vitality and viability. Development proposals should contribute to the renewal and revitalisation of the town centre by: - 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; - 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 - 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 in the Bell Green and Lower Sydenham area. F. The renewal of Upper Sydenham/Kirkdale Local Centre will be supported in order to secure its long-term vitality and viability. Development proposals must contribute to area improvements through high quality designs that help to create a more cohesive and positive relationship between the centre and neighbouring properties and sites, including the Willow Way LSIS and redeveloped former Sydenham police station. G. The continued renewal of Brockley Cross Local Centre will be supported in order to secure its long-term vitality and viability. Development proposals must contribute to the renewal and revitalisation of the centre by: - Reinforcing its distinctive character, particularly by maintaining a diverse mix of uses and responding positively to its historic character;	

IPolicy	Description	Likely Significant Effects
	b. Seeking opportunities to support and make provision of workspace for the cultural and creative industries, building on the existing cluster of activities to complement and strengthen relationships with the Forest Hill Cultural Quarter and Lewisham Creative Enterprise Zone; and 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 by: a. Reinforcing their distinctive and historic character, particularly by maintaining a diverse mix of main town centre uses and 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 c. Seeking to alleviate vehicle congestion by improving the walking and cycle environment.	
Policy LWA 3 – Forest Hill District Centre and Surrounds	A. Development proposals must support the long-term vitality and viability of Forest Hill District Centre 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. 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 must also deliver a complementary mix of main town centre uses, 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 District Centre and its surrounds as a key hub of creative, cultural and community activity will be supported and reinforced by: 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);	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support

IPolicy	Description	Likely Significant Effects
	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); 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; d. Extending the boundary of the Malham Road LSIS to include 118 Stansted Road, along with protecting and enhancing uses within the LSIS that make a positive contribution to the Cultural Quarter; and e. Promoting and protecting the Horniman Museum and Gardens as a significant cultural asset, along with securing public realm enhancements that 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 it a significantly more accessible, safer, healthier and attractive place. Particular consideration will need to be given to movements along and across: a. The main junction and major roads, including the South Circular (A205), Dartmouth Road (A2216), Clyde Vale, Perry Vale and Waldram Park Road; and b. Station approaches and forecourts.	

IPolicy	Description	Likely Significant Effects
	D. Development proposals designed to improve the quality of the station underpass (including its visibility, legibility and safe use) will be strongly supported. E. Development proposals must respond positively to the evolving urban character of the town centre and its immediate surrounds. They must be designed to provide for an appropriate transition in scale, bulk, mass, 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.	
Lewisham West Site Allocations	See Appendix C	Potential HRA Implications that require further investigation of likely significant effects in the body of the report. An increase in residential, commercial or industrial/business development has the potential to cause likely significant effects upon European designated sites should the developments be within the Zone of Influence of the site. Potential Impact pathways include: • Recreational pressure • Water quality and resources • Air quality
Policy DM 1 – 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, landowners, development industry partners, public sector bodies and the wider public to deliver the Local Plan.	No HRA Impact This is a development management policy with regards to working with stakeholders.

IPolicy	Description	Likely Significant Effects
	B. Progress towards the delivery of the Local Plan will be regularly monitored and assessed, in line with Policy DM7 (Monitoring and review). Where revisions to planning policies 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. C. The Council use powers available to it where this is necessary to support the delivery of the Local Plan, including planning enforcement.	
Policy DM 2 – 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 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.	No HRA Implications This is a development management policy regarding where the council may seek planning obligations and CIL charging

IPolicy	Description	Likely Significant Effects
	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	
Policy DM 3 – 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.	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support

IPolicy	Description	Likely Significant Effects
	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.	
Policy DM 4 – Land Assembly	A. To enable the delivery of the Local Plan and the spatial strategy for the Borough the Council will support land assembly to achieve comprehensive development. 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.	No HRA Implications This policy is a development management policy which sets criteria by which proposals must demonstrate for support

IPolicy	Description	Likely Significant Effects
	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.	
Policy DM 5 – Meanwhile Uses	A. Development proposals for the meanwhile (temporary) use of vacant land or buildings 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; 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 proposals for the meanwhile (temporary) use of vacant land and buildings within town centres and designated employment areas must not adversely impact on the viability of the town centre or function of the employment area in supporting commercial uses and activities.	No HRA Implications This policy is to ensure that the Local Plan will be reviewed throughout the plan period.

IPolicy	Description	Likely Significant Effects
DM 6 - Health Impact Assessments	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.	No HRA Implications This policy is a development management policy.
DM 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 or across the Borough, the Council will consider the need for a review of strategic approaches or policies.	No HRA Implications This policy is a monitoring policy.

Appendix C Site Allocations

Site Allocation Name	Site Location	Indicative Capacity (town centre/employment/other floorspace = m ²)
Lewisham Gateway	Central	649 net residential units Employment: 1,524 Town centre: 9,548
Lewisham Shopping Centre	Central	1,579 net residential units Employment: 20,097 Town centre: 60,291
Land at Engate Street	Central	112 net residential units Employment: 6,642 Town centre: 2,013
Connington Road	Central	365 net residential units Town centre: 554
Land at Conington Road and Lewisham Road (Tesco)	Central	407 net residential units Employment 1,901 Town centre: 7,604
Lewisham Retail Park, Loampit Vale	Central	529 net residential units Town centre: 4,343
Silver Road and Axion House	Central	141 net residential units Town centre: 453
PLACE/Ladywell (former Ladywell Leisure Centre	Central	175 net residential units Employment: 462 Town centre: 849
Ladywell Play Tower	Central	33 net residential units Town centre: 1,459
Driving Test Centre, Nightingale Grove	Central	40 net residential units Employment: 1,386
Land at Nightingale Grove and Maythorne Cottages	Central	22 net residential units Employment: 179
Church Grove Self-build	Central	36 net residential units
100 – 114 Loampit Vale	Central	30 net residential units Employment: 298 Town centre: 596
Ravensbourne Retail Park	Central	367 net residential dwellings Employment: 12,786 Town centre: 1,937
Catford Shopping Centre and Milford Towers	Central	1084 net residential units Employment: 5,387 Town centre: 21,546
Catford Island	Central	602 net residential units Employment 6,206 Town centre: 6,206
Laurence House and Civic Centre	Central	262 net residential units Employment 12,935 Town centre: 6,017
Wickes and Halfords, Catford Road	Central	512 net residential units Employment 8,946 Town centre: 2,982
Land at Rushey Green and Bradgate Road (Aldi)	Central	88 net residential units Town centre: 4,100
House on the Hill at Slaithwaite Road	Central	52 net residential units
Heathside and Lethbridge Estate	East	443 net residential units

		Town centre: 1,280
Blackheath Hill Locally Significant Industrial Site	East	63 net residential units Employment: 2,288
Leegate Shopping Centre	East	450 net residential units Employment 805 Town centre: 5,449
Sainsbury's Lee Green	East	111 net residential units Employment: 625 Town centre: 4,123
Southbrook Mews	East	23 net residential units Employment 804
Land at Lee High Road and Lee Road	East	55 net residential units Employment 256 Town centre: 1,023
Mayfields Hostel, Burnt Ash Hill	East	21 net residential units
Sainsbury's Local and West of Grove Park Station	East	78 net residential units Employment: 362 Town centre: 1,449
Silwood Street	North	61 net residential units Employment 1,313 Town centre: 200
Bermondsey Dive Under	North	Employment: 5,264
Convoys Wharf Mixed-use Employment Location	North	3,500 net residential units Employment: 47,700 Town centre: 50,400
Deptford Landings Mixed-Use Employment Location (formerly known as Oxestalls Road) and Scott House	North	1,940 net new dwellings Employment: 11,784
Evelyn Court Locally Significant Industrial Site	North	102 net residential units Employment: 2,381
Neptune Wharf Mixed-use Employment Location	North	199 net residential units Town centre: 1,973
Surrey Canal Road and Trundleys Road Locally Significant Industrial Site	North	274 net residential units Employment: 2,890
Apollo Business Centre Locally Significant Industrial Site	North	98 new residential units Employment: 3,396
Surrey Canal Triangle Mixed-use Employment Location	North	4,089 net residential dwellings Employment: 14,253 Town centre: 46,469
Former Hatcham Works, New Cross Road	North	800 net residential units Employment: 7,550 Town centre: 10,000
Goodwood Road and New Cross Road	North	167 net residential units Employment: 3,550 Town centre: 1,050
Former Deptford Green School (Upper School Site)	North	120 net residential units
Albany Theatre	North	119 net residential units Employment: 758 Town centre: 3,032
Land north of Reginald Road and south of Frankham Street (Former Tidemill School)	North	201 net residential units
Sun Wharf Mixed-use Employment Location	North	220 net residential units Town centre: 1,443
Creekside Village East, Thanet Wharf Mixes-use Employment Location	North	393 net residential units Employment: 114 Town centre: 962
Lower Creekside Locally Significant Industrial Site	North	162 net residential units Employment 8,201

Besson Street, (Kender Triangle)	North	324 net residential units Employment 1,064
Achilles Street	North	363 net residential units Town centre: 2,716
Former Bell Green Gas Holders and Livesey Memorial Hall	South	100-442 net residential units Employment: 465 Town Centre: 1,859
Bell Green Retail Park	South	748-1,831 net residential units Employment: 3,740 Town centre: 14,961
Sainsbury's Bell Green	South	550-1,347 net residential units Employment: 2,751 Town centre: 11,003
Stanton Square Locally Significant Industrial Site	South	94-231 net residential units Employment 3,249
Sydenham Green Group Practice	South	36-87 net residential units Town centre 2,487
Worsley Bridge Road Locally Significant Industrial Site	South	113-179 net residential units Employment: 11,907
Lidl, Southend Lane	South	17 net residential units Town centre: 1,204
Excalibur Estate	South	287 net residential dwellings
Bestway Cash and Carry	South	136 net residential units
Homebase/Argos, Bromley Road	South	141 net residential units Town centre: 5,694
Downham Co-op	South	42 net residential units Town centre: 1,440
Beadles Garage	South	25 net residential units Employment: 610
Catford Police Station	South	24 new residential units Employment: 1,072
Land at Pool Court	South	6 new residential units
111 – 115 Endwell Road	West	57 net residential units Employment: 1,975
6 Mantle Road	West	20 net residential units Employment: 95 Town centre: 378
Jenner Health Centre	West	30 net residential units Town centre: 2,081
Land at Forest Hill Station West (Devonshire and Dartmouth Roads)	West	80 net residential dwellings Employment: 801 Town centre: 1,602
Clyde Vale Locally Significant Industrial Site	West	21 net residential dwellings Employment: 1,701
Featherstone Lodge, Eliot Bank	West	33 net residential dwellings
Willow Way Locally Significant Industrial Site (LSIS)	West	175 net residential units Employment: 6,705
Land at Forest Hill Station east (Waldram Place and Perry Vale)	West	39 net residential units
Perry Vale Locally Significant Industrial Site	West	146 net residential units Employment: 10,206
Land at Sydenham Road and Loxley Close	West	125 net residential units Employment: 582 Town centre: 2,330
113 – 157 Sydenham Road	West	157 net residential units Employment: 1,565 Town centre: 3,130
74 to 78 Sydenham Road	West	16 net residential units Employment: 164 Town centre: 328
Land at Forest Hill Station East (Waldram Place and Perry Vale)	West	41 net residential units Employment: 191 Town centre: 764

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