

# PART

# ONE

1	<b>ABOUT LEWISHAM'S LOCAL PLAN .....</b>	<b>13</b>
2	<b>LEWISHAM TODAY &amp; PLANNING AHEAD .....</b>	<b>33</b>
3	<b>VISION, STRATEGIC OBJECTIVES AND THE SPATIAL STRATEGY ....</b>	<b>47</b>



# 1 ABOUT LEWISHAM'S LOCAL PLAN

Consultation information.....	7
Preface.....	9
An Open Lewisham as part of an Open London.....	15
The planning framework.....	16
Lewisham's new Local Plan 2020-2040 .....	18
How the plan is being prepared.....	20
Getting involved in the new Local Plan .....	23
How to use the plan .....	27
Strategic and non-strategic policies .....	30



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1 View of All Saints, Blackheath looking south-east from Blackheath

2 Looking west, housing along Handen Road, Lee

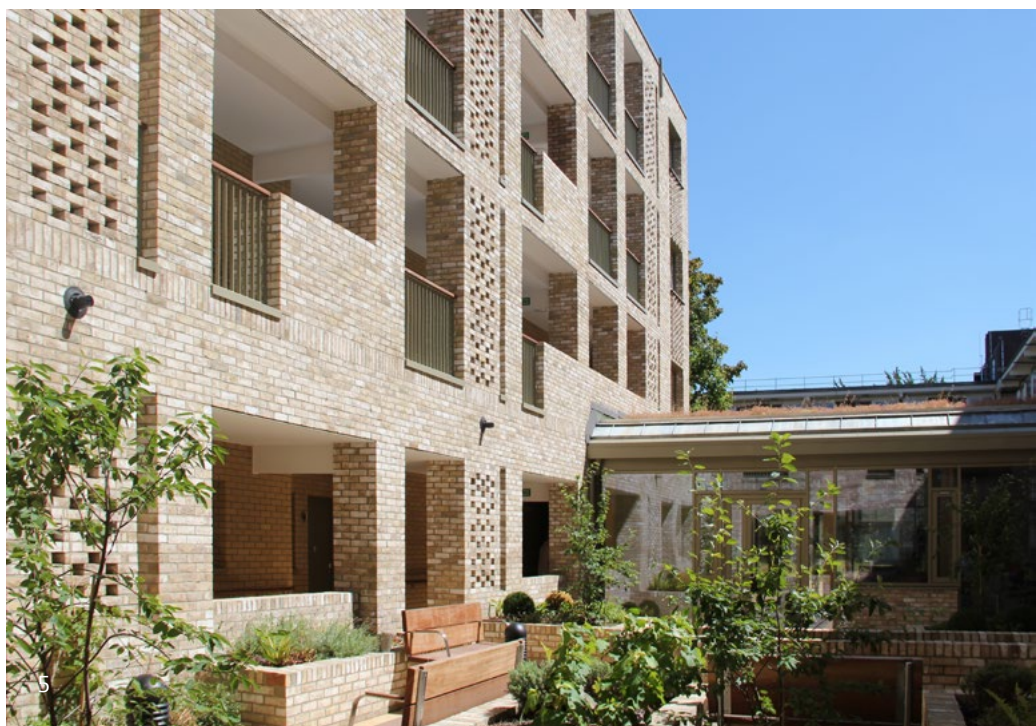
3 Catford mural

4 Catford Foodmarket

5 Hazelhurst Court (Levitt Bernstein)



4



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## An Open Lewisham as part of an Open London

- 1.1 **Lewisham's Local Plan sets out a shared vision for the future of the Borough along with the planning and investment framework to deliver this vision through to 2040. The main objective of the plan is to achieve 'An Open Lewisham as part of an Open London'. This reflects our commitment to ensure that Lewisham is a welcoming place of safety for all, and where the diversity of the Borough is celebrated. The prosperity of our local neighbourhoods, and the communities of people within them, is essential to ensuring equality of opportunity and for everyone to enjoy a good quality of life.**
- 1.2 London has experienced a period of rapid growth and this is expected to continue. Lewisham will grow and evolve as London does. This Local Plan has been prepared to ensure there is a clear framework in place to positively manage growth in a way that respects the distinctive character and diversity of the Borough. The plan will help to ensure that investment decisions meet the aspirations of local communities and contribute to sustaining and creating inclusive, safe, healthy and liveable neighbourhoods.
- 1.3 The Mayor of London recently introduced the concept of 'Good Growth' underpinning the new draft London Plan. Good Growth is growth that is socially and economically inclusive and environmentally sustainable.<sup>1</sup> Sitting alongside this is the Mayor of London's ambition for the Capital to be 'A City for all Londoners'. The objective of this Local Plan for 'An Open Lewisham as part of an Open London' responds to these aspirations at a local level, whilst recognising the important role that Lewisham plays as an integral part of London.
- 1.4 The successful delivery of the Local Plan will require strong and effective partnership working between public and private sector stakeholders, as well as local communities. The Council will continue to take a leadership role in planning positively for the Borough. Through our unique ways of working, known as the 'Lewisham Way', we will work alongside stakeholders, community groups and local residents to deliver the Local Plan objectives, guided by the aim of delivering prosperous communities and achieving better outcomes for all.

<sup>1</sup> The London Plan, Intend to Publish Version (December, 2019), paragraph 0.0.18.

# The planning framework

- 1.5 Lewisham's Local Plan is prepared within the context of a wider planning framework. This sets the main parameters for the plan making process, as well as the contents of local plans and how they should operate. The Planning and Compulsory Purchase Act 2004 is primary legislation that provides the main basis for the plan-led system in England. It is supported by secondary legislation, including the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which provide further details on the process for the Council to prepare and adopt the local plan and other supporting documents.

## National planning policy and the London Plan

- 1.6 The Local Plan is required to be consistent with national policy, including the National Planning Policy Framework (NPPF) (2019) and planning Circulars. The NPPF sets out the Government's planning policies for England and how they should be applied. It includes parameters for the preparation of local plans and is also a material consideration in planning decisions. The NPPF is supported by National Planning Practice Guidance (NPPG) covering a variety of topic areas.
- 1.7 The Local Plan must also be in general conformity with the regional planning policies contained in the London Plan, which is produced by the Mayor of London. The London Plan is the Spatial Development Strategy for Greater London. It helps to ensure a coordinated approach to planning across all boroughs. The London Plan forms part of Lewisham's development plan, meaning it must be taken into account in planning decisions. The London Mayor also prepares Supplementary Planning Guidance (SPG) documents that support implementation of the London Plan.

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

## Lewisham's development plan

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

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

<sup>3</sup> Planning and Compulsory Purchase Act 2004, Section 28 (6).

## NATIONAL

National Planning  
Policy Framework

Planning Practice  
Guidance

DEVELOPMENT  
PLAN  
DOCUMENTS

SUPPLEMENTARY  
PLANNING  
GUIDANCE AND  
DOCUMENTS

OTHER  
DOCUMENTS

REGIONAL  
MAYOR OF LONDON

London Plan

Supplementary  
Planning Guidance

BOROUGH  
LONDON BOROUGH OF  
LEWISHAM

Lewisham Local  
Plan

Supplementary  
Planning  
Documents

Adopted Policies  
Map

Local Development  
Scheme

Statement of  
Community  
Involvement

Annual Monitoring  
Programme

LOCAL  
NEIGHBOURHOOD  
FORUMS

Neighbourhood  
Plans

**Figure 1.1:** The planning policy hierarchy



# Lewisham's new Local Plan 2020-2040

1.10 Lewisham's new Local Plan will replace the Council's current suite of development plan documents, bringing the updated policies together into a single plan.<sup>4</sup>

1.11 We are producing a new Local Plan to:

- Respond to significant **changes to the wider planning context** – since the Lewisham Core Strategy was adopted in 2011, new national policy has been introduced, i.e. the NPPF. This includes new requirements both for plan making and decision taking. The London Plan has also been substantially updated and a draft new (replacement) plan has been published with significant policy changes and a new spatial development strategy. In addition, the Council has a new statutory duty to review its Local Plan every five years. We need to ensure there is an up-to-date plan that aligns with these new higher-level policies and requirements.
- Respond to the **climate emergency** – in February 2019 the Council declared a climate emergency.<sup>5</sup> We recognise that a changing climate will have severe and enduring implications, and that tackling climate change is an issue of social justice as the greatest impacts will be on the most vulnerable. The new Local Plan is needed to respond to the climate emergency, with a clear framework for Lewisham to contribute to meeting the UK's new net zero carbon target.<sup>6</sup>

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

<sup>5</sup> London Borough of Lewisham. Meeting of Council on 27 February 2019. Motion 2 declared to be unanimously carried.

- Realise the **objective of an Open Lewisham** – a new plan is needed to address the emerging challenges and opportunities that our residents, businesses and visitors now face. The Local Plan will help to manage growth and coordinate investment locally, reflecting the aspirations and priorities of local communities and the Council's new Corporate Strategy 2018-2022. The plan is also presented in a new format to help deliver this vision. It comprises a single document providing a clear planning and decision-making framework, with a renewed emphasis on Lewisham's distinctive neighbourhoods and places. This will be particularly useful to community groups preparing neighbourhood plans and others who are seeking to get involved with planning locally.
- Meet **local needs for genuinely affordable housing**, jobs and community facilities, including high quality green spaces – the Core Strategy and its supporting plans have helped the Council and its partners to deliver a significant increase in homes along with investment in town centres, new workspace and infrastructure. Most of the key strategic development sites identified in the existing plan have now either gained planning consent, been built, or are under construction. With the London Plan and NPPF setting ambitious growth targets there is a pressing need to identify additional development sites and land to accommodate new homes along with workspace and jobs, town centre uses and community facilities.

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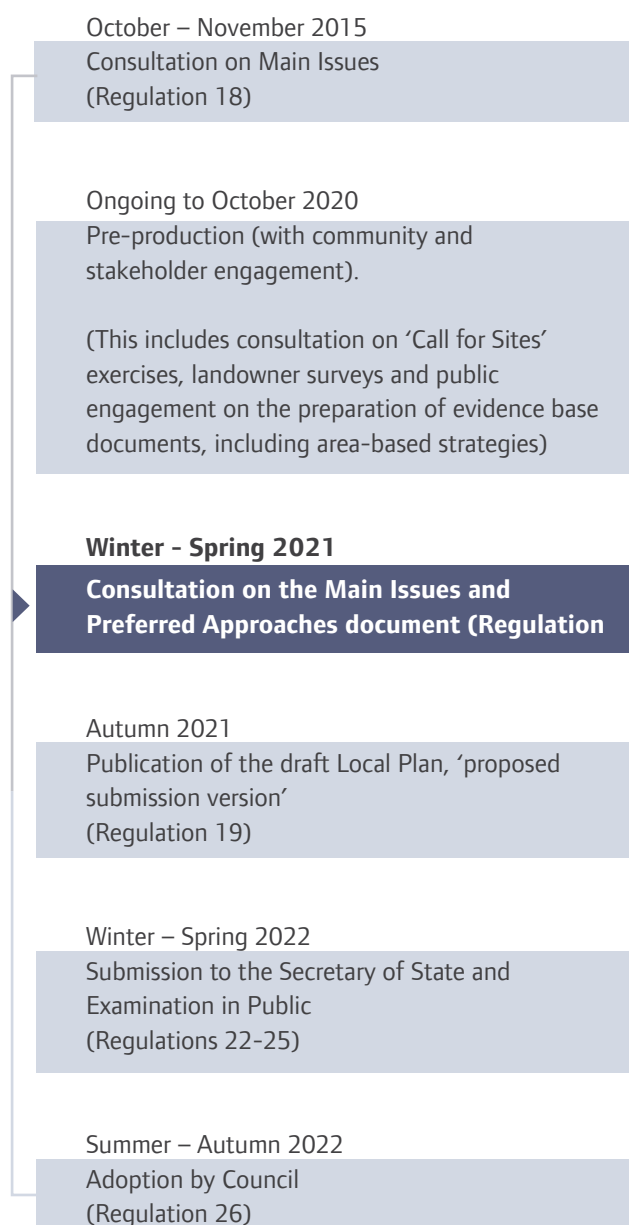
<sup>6</sup> In June 2019, the UK passed legislation to revise the Climate Change Act target to an emissions reduction of "at least 100%" by 2050 (net zero).

- Secure the delivery of the **Bakerloo Line extension** and other transport infrastructure – investment in transport infrastructure is needed to help tackle deprivation and improve health outcomes locally, as well as to accommodate and promote Good Growth. The draft London Plan now confirms a commitment to upgrade and extend the Bakerloo line (London Underground) to Lewisham. The new Local Plan is needed to help secure the delivery of the tube line extension and set a framework to maximise the local benefits it can bring.

## How the plan is being prepared

### Key stages

- 1.12 There are a number of stages involved in the preparation of a local plan. In addition, there are procedural requirements that the Council is required to comply with throughout. These stages and requirements are prescribed by national policy and legislation. This includes the undertaking of multiple rounds of public consultation before a draft local plan can be submitted to the Secretary of State for independent public examination.
- 1.13 **Figure 1.2** sets out the key stages of the plan making process, highlighting the current stage of production.<sup>7</sup>



**Figure 1.2:** Key stages of the Plan making process

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

## Evidence base

- 1.14 We have compiled a number of studies and supporting documents to help inform the preparation of the new Local Plan. These have been prepared both by the Council and other organisations, including government bodies. Collectively, these documents are known as the 'evidence base'. The evidence base helps to ensure that the approaches and policies in the Local Plan are appropriate and justified, taking into account the latest available information.
- 1.15 Our evidence base comprises technical studies, research reports, site and area masterplans, an Integrated Impact Assessment and other information covering a variety of topic areas and local issues, including: design, housing, economy, environment, transport and infrastructure. We have consulted local communities and other stakeholders on the preparation of some evidence base documents. This includes the Lewisham Characterisation Study (2019), the New Cross Area Framework and Catford Town Centre Masterplan. The evidence base documents have been made publically available on the Council's website and form part of the Local Plan library.

## Integrated Impact Assessment

- 1.16 An Integrated Impact Assessment (IIA) helps to inform the preparation of the Local Plan. It is a detailed analysis of the potential environmental, social and economic effects of the plan. The IIA brings different types of assessment together into a single process, including:
- Strategic Environmental Assessment (SEA)
  - Sustainability Appraisal (SA)
  - Equalities Impact Assessment (EqIA)
  - Health Impact Assessment (HIA)
- 1.17 The IIA is undertaken as an iterative process during the plan's preparation. It includes assessments of preferred policy approaches and reasonable alternatives. Reports are published and consulted on at key stages in the plan process, often alongside draft Local Plan documents. The IIA helps to identify potential issues at an early stage so that measures to avoid or mitigate harm, and improve expected outcomes, can be incorporated into the plan.
- 1.18 A separate Habitats Regulations Assessment (HRA) is also carried out to assess whether protected habitats and species may be adversely impacted by the plan's implementation.<sup>8</sup>

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

## Tests of soundness

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

## Duty to Cooperate

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

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

TESTS OF SOUNDNESS FOR LOCAL PLANS (NPPF, paragraph 35).	
Positively prepared	Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
Justified	An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
Effective	Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
Consistent with national policy	Enabling the delivery of sustainable development in accordance with the policies in this Framework.

## Getting involved in the new Local Plan

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

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

### **Previous engagement and the journey so far** **Starting the Local Plan review**

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

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

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

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

### **What has changed since?**

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

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



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

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

1.28 Finally, Coronavirus (COVID-19) has had a profound impact on countries around the world. The initial peak of COVID-19 was experienced by the UK in spring 2020. It has directly affected people and communities across Lewisham and remains an ongoing concern. The Council continues to play a critical role by working with its partners to deliver essential services. Our priority during this period is to support everyone in the Borough through these unprecedented

times, safeguarding the health of local communities and protecting the most vulnerable. Despite the current uncertain circumstances, it will be vital to plan proactively towards a recovery. This means taking stock of the different ways in which Lewisham's neighbourhoods, communities and local economy have been (and may continue to be) affected and responding with timely and appropriate measures.

### **Early engagement on the main planning issues**

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

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

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

### **Re-visiting the main planning issues**

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

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

<sup>11</sup> Further information is set out in the Lewisham Local Plan: Site Allocations Background Paper (2020).

## Have your say

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

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

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

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

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

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

## How to use the plan

- 1.39 **The Local Plan sets out a vision, strategic objectives and planning policies that together provide the overarching framework for the delivery of sustainable development in the Borough. It covers the twenty-year period from 2020 to 2040.<sup>13</sup> The plan will help to support implementation of the draft London Plan and its aspirations for achieving 'Good Growth' locally, recognising that Lewisham is an integral part of London.**
- 1.40 The Local Plan will be used by the Council, its partners, key stakeholders, community groups and others as a tool to help guide critical decisions on investment, including for strategic infrastructure. It establishes a spatial strategy that aims to direct growth and different kinds of development across the Borough in a way that responds to the distinctive qualities of Lewisham's people and places. The Local Plan also provides a coordinated strategy for each of the character sub-areas of the Borough, addressing the neighbourhoods that residents, businesses, and visitors use every day.
- 1.41 For legibility the Local Plan is set out in main parts and sub-sections that cover a number of policy areas however it must be read as a whole, particularly for the purpose of planning and investment decisions.
- 1.42 The Local Plan is organised into five main parts:

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

## Part One: Setting the scene and the spatial strategy

Provides background information about the Local Plan. It then sets out the Vision for Lewisham and the plan's strategic objectives. It also establishes the proposed 'spatial strategy' for the Borough, the land-use priorities and overall pattern of development that the plan will seek to deliver.

## Part Two: Managing development

Sets out the proposed 'development management' policies – these are the standards and guidelines that planning applications will need to comply with to support the delivery of Good Growth in Lewisham. These are organised by policy topic areas – for each we highlight how we have arrived at the proposals, as set out below:



### What you've told us

A summary of comments from early consultation and engagement exercises. This includes feedback from studies and area-based strategies that have informed, and will help to support, the Local Plan (e.g. New Cross Area Framework and Catford Town Centre Masterplan).



### What we've learnt

Key findings from research and studies of the Borough.



### Main issues

Our understanding of the main issues for the new Local Plan, drawing from public feedback and the evidence base.



### We're proposing to

A short summary of the preferred policy approaches to address the main issues. The full details of the preferred approaches are included afterwards (these are distinguished by draft policies with titles and reference numbers).



### We've also considered

Identifies the other policy approaches that have been considered (i.e. reasonable alternatives) but which are not proposed to be taken forward in the draft plan.<sup>14</sup>

<sup>14</sup> The Lewisham Local Plan Integrated Impact Assessment (IIA) - Interim Report (2020) includes a detailed discussion of the reasonable alternatives considered during the preparation of this Local Plan document.

**Part Three:  
Lewisham's neighbourhoods  
& places**

Establishes five character areas within the Borough based around Lewisham's distinctive neighbourhoods and places. A vision, spatial objectives and strategic priorities (referred to as 'place principles') are set out for each of these areas, along with site allocation policies for strategic development sites.

**Part Four:  
Delivery and monitoring**

Sets out the implementation framework for the Local Plan, as well as the arrangements for monitoring outcomes over the plan period.

**Part Five:  
Schedules and appendices**

Includes additional technical information and guidance to support implementation of the plan.



## Strategic and non-strategic policies

1.43 The Council is legally required to identify the strategic priorities for the development and use of land in the Borough, and to set out policies to address these in the local plan.<sup>15</sup> The NPPF also makes clear that local plans should identify and clearly distinguish strategic policies from other non-strategic policies.<sup>16</sup> A schedule of the Local Plan non-strategic policies is included in Part 5 of the Local Plan. Those policies not included in the scheduled are strategic policies.

### Neighbourhood planning

1.44 We will continue to work with local communities and community groups to improve transparency and openness in decision-making, and to foster greater public understanding of and involvement in the planning process.

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

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

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<sup>15</sup> Planning and Compulsory Purchase Act 2004, Section 39(2).

<sup>16</sup> NPPF (2019), paragraph 21.







## 2 LEWISHAM TODAY & PLANNING AHEAD









## Introduction

- 2.1 This section provides a brief overview of Lewisham in the context of London and the wider region. It draws on the latest available information to provide a snapshot of the Borough across a range of topic areas, highlighting key findings and recent trends. It also identifies some of the main opportunities and challenges facing Lewisham's residents, businesses and visitors, including considerations for the built and natural environment.



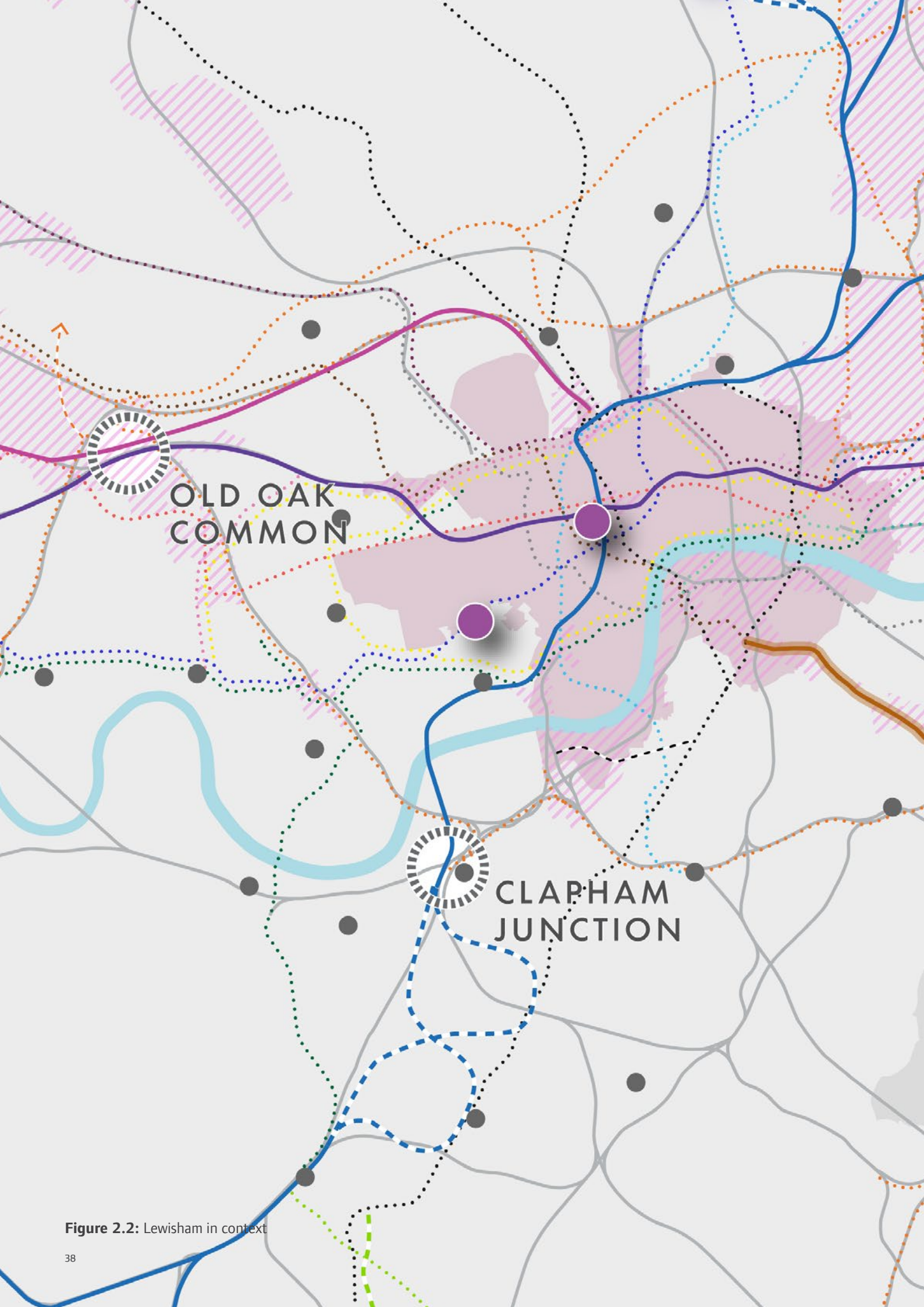


Figure 2.1: Lewisham borough map

## Lewisham in context

- 2.2 Lewisham is an inner-London borough strategically located in the Thames Gateway, with connections to Canary Wharf and the Central Activities Zone. It has major centres at Lewisham and Catford, and two London Plan Opportunity Areas with strategic potential (New Cross / Lewisham / Catford corridor and Deptford Creek / Greenwich Riverside). Lewisham has experienced rapid growth in both population and households over the last ten years, and has a relatively young and very ethnically diverse population.
- 2.3 There has been significant investment in recent years in many parts of Lewisham. This has largely been concentrated in the north of the Borough and in Lewisham major town centre and its surrounds, coinciding with the significant amount of new housing and transport infrastructure in these areas. Whilst levels of deprivation have improved recently Lewisham remains within the 20% most deprived local authorities in England, and is the tenth most deprived London Borough. It has the highest proportion of children and young people, and older people in economic deprivation in the country.
- 2.4 There are also pronounced concentrations of deprivation in many local areas. Life expectancy across Lewisham is comparable to the London average, however in the most deprived areas life expectancy is 6.1 years lower for males and 5.1 years lower for females. Future investment will need to consider these inequalities and varied geographies of deprivation.
- 2.5 Physical activity is a key determinant of public health and wellbeing, with obesity linked to many serious risks in children and adults. Whilst over half of Lewisham adults are physically active, adult and childhood obesity is an issue. Children living in the Borough's most deprived areas twice as likely to be obese or overweight as other children.
- 2.6 Lewisham's diverse history has led to a range of distinct places and neighbourhoods, each with its own unique character and identity. This is reflected in the historic environment that features over 600 statutory listed buildings, 29 conservation areas, as well as Lewisham's varied and vibrant cultural scene. Lewisham has a mix of housing stock, size and tenure, with a rapidly growing private rented sector. Median house prices in Lewisham have risen over 310% from £99,995 in 2000 to £412,000 in 2017. Whilst monthly private rental prices have remained relatively low, median rental prices increased 35% from 2010 to 2017 (London average 14%). In 2017 average private rents were 43% of average household incomes.
- 2.7 Despite Lewisham's strategic inner-London location, its local economy is generally small and inward looking. Local jobs are concentrated in the public sector and consumer services, with high levels of small business activity including self-employment, micro businesses, and sole proprietors. Whilst a relatively limited proportion of residents are employed in the Borough, a relatively high proportion are economically active. Many residents lack workplace skills and qualifications, and GCSE results are below the London average. The Creative and Digital Industries (CDI) is an emerging growth sector, and north Lewisham is home to one of London's first Creative Enterprise Zones.





OLD OAK  
COMMON

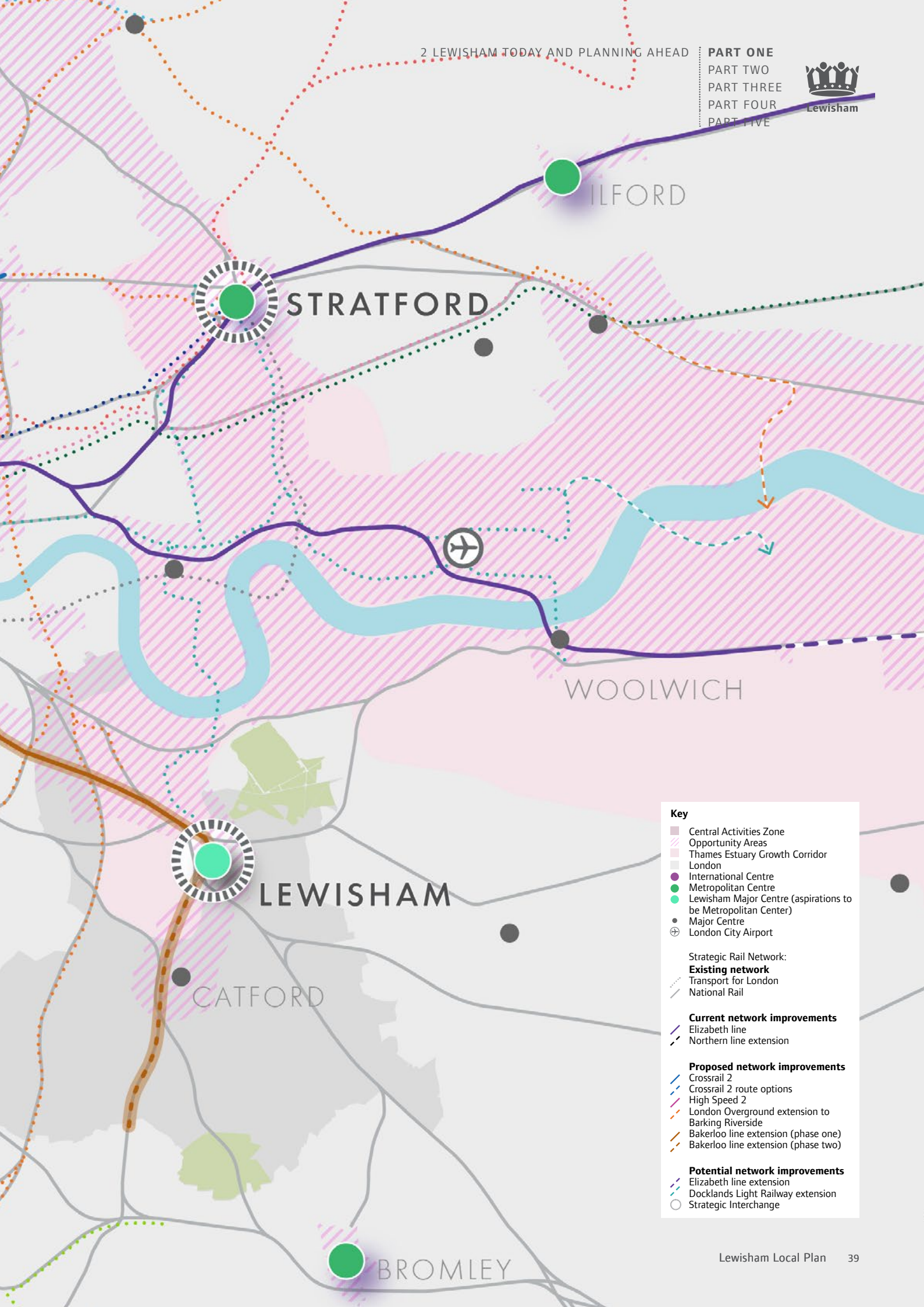
CLAPHAM  
JUNCTION

Figure 2.2: Lewisham in context





Lewisham



**Key**

- Central Activities Zone
- Opportunity Areas
- Thames Estuary Growth Corridor
- London
- International Centre
- Metropolitan Centre
- Lewisham Major Centre (aspirations to be Metropolitan Center)
- Major Centre
- London City Airport

**Strategic Rail Network:**

**Existing network**

- Transport for London
- National Rail

**Current network improvements**

- Elizabeth line
- Northern line extension

**Proposed network improvements**

- Crossrail 2
- Crossrail 2 route options
- High Speed 2
- London Overground extension to Barking Riverside
- Bakerloo line extension (phase one)
- Bakerloo line extension (phase two)

**Potential network improvements**

- Elizabeth line extension
- Docklands Light Railway extension
- Strategic Interchange



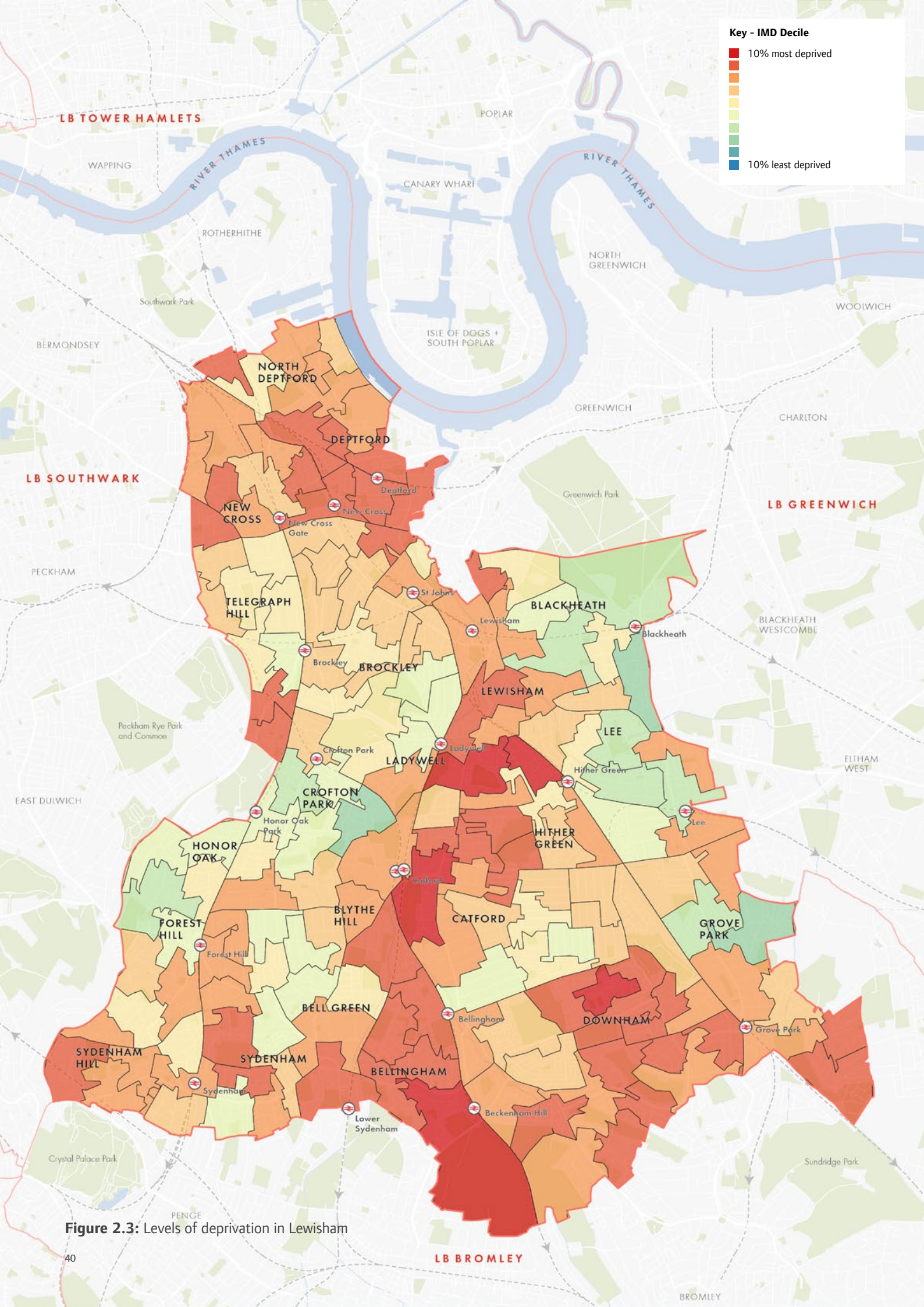


Figure 2.3: Levels of deprivation in Lewisham

- 2.8 Industrial and commercial activity is largely focussed towards the Borough's designated employment locations and town centres, including two London Plan Strategic Industrial Locations (SIL). A process of plan-led industrial land consolidation has occurred in recent years to help facilitate regeneration in the north of the Borough. However the rate of employment land release (on both designated and non-designated sites) has been significant in recent years. Whilst local employment sites are under increasing pressure for change of use, there is a tight supply of industrial land and relatively healthy industrial market, with a strong demand for workspace, low vacancy rates, and limited availability at key locations. The Borough has a well-functioning network of town centres, although vacancy rates are an increasing concern. The use of multi-channel (on-line) shopping is changing the way in which people use centres. There is projected to be less demand for retail floorspace over the future, with greater demand to accommodate leisure and other complementary town centre uses.
- 2.9 Lewisham is one of the greenest Boroughs in London with around one-quarter of its area being green/open space. Despite this there are parts of the Borough that are deficient in public access to open space. This is often a result of natural and constructed features (river valleys, railway lines, major arterial roads), which can act as a barrier to movement by walking and cycling. Overall more than 95% of the publically accessible spaces in Lewisham are considered to be of good or fair quality. Whilst carbon dioxide emissions and total energy consumption have steadily fallen in Lewisham, emissions remain an issue and the Council has declared a climate emergency
- in February 2019. The South East London Combined Heat and Power (SELCHP) plant offers potential to support a district heat network to supply energy to homes and businesses in the north of the Borough.
- 2.10 Lewisham has varied transport connectivity, with the northern and central areas generally well served by public transport, whilst the far north and south east of the Borough have poorer infrastructure and lower public transport coverage. This contributes to a relatively high proportion of daily trips being made by car and motorcycle. Daily cycle trips are at a comparable level to inner-London. Large parts of the Borough are covered by Air Quality Management Areas, including along main and arterial roads.
- 2.11 The draft London Plan identifies the proposed Bakerloo Line Extension (BLE) as a key strategic transport infrastructure. The preferred route of the BLE proposes phase 1 extending from Elephant & Castle via Old Kent Road with stations at New Cross Gate and Lewisham. A potential phase 2 extension of the Bakerloo Line is being discussed that would run further south into the Borough. The BLE presents a key opportunity to reinforce Lewisham's strategic role as a transport hub servicing the sub-region, and to deliver substantial investment in the Borough.





## Planning ahead for an Open Lewisham

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

### Accommodating growth

- 2.13 The rapid population growth experienced in Lewisham in recent years is expected to continue, with projections estimating a **19% population growth between 2017 and 2040**.<sup>17</sup> This will likely put further pressure on local services and infrastructure, and may exacerbate issues around access to high quality housing and affordability. At the same time, there are likely to be new opportunities and local benefits arising from growth, for example, through the revitalisation and regeneration of town centres, renewal of employment land and greater investment in services and strategic infrastructure, particularly transport infrastructure.
- 2.14 Since the Core Strategy was adopted in 2011 Lewisham has delivered a consistent supply of new homes, regularly exceeding its housing targets. The Council recognises the issues around access to high quality and genuinely affordable housing. The scale of the need is

<sup>17</sup> Greater London Authority, Housing-led population projections (2017)

reflected in both the draft new London Plan and the NPPF housing targets, and the expectation is that the Borough will continue to play a key role in accommodating housing growth.

- 2.15 The draft London Plan sets out the challenge facing all London boroughs to deliver a significant increase in housing to meet current and future needs across the region. In order to address the identified needs, it sets out 10-year housing targets for all boroughs. **Lewisham's target is 16,670 net housing completions (or 1,667 net new homes per year)**. Alternatively, a Local Housing Need (LHN) figure for the Borough is calculated using the method set out in national policy. This method suggests that the minimum housing need in the Borough is up to 2,964 net units per year.
- 2.16 Evidence shows that there is a need to secure additional retail and employment floorspace in Lewisham. **There is an estimated demand for approximately 5,300 net additional square metres of retail floorspace up to 2030 and 21,800 net additional square metres of employment floorspace up to 2038**. By planning to meet this need, we can help to address the economic issues facing our high streets and support the evolving role of town centres as leisure and entertainment destinations. It should also support an improved local economy and an increase in local jobs, and assist in growing the creative and digital industry clusters.
- 2.17 A plan-led process of industrial land consolidation has been facilitated by the Council over recent years, particularly to support strategic regeneration projects. However, a significant amount of employment land and floorspace has also been lost through piecemeal development, aided by the

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

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

### **Tackling deprivation and ensuring equality of opportunity**

- 2.18 There is a pressing need to reduce inequality and the negative consequences of deprivation in the Borough, and to ensure equality of opportunity, especially for those living in the Borough's most deprived areas.
- 2.19 There has been significant investment in recent years in many parts of Lewisham. In order to tackle deprivation and ensure equality of opportunity for all, it will be necessary to ensure all Lewisham residents benefit from future investment in new homes, jobs, town centre uses, and supporting infrastructure.

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

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

### **Achieving healthier, more liveable and resilient communities**

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

- 2.23 The built environment is critical to achieving these ambitions. The layout and design of places and spaces can enable and encourage active travel choices, such as walking and cycling. Additionally, it can assist in reducing people's exposure to harmful pollutants or other disturbances, and increase the ability of people to access high quality open space and natural features. Such spaces can impact positively on physical and mental health by allowing opportunities for leisure, recreation, and dwelling. The Local Plan will need to ensure that all new development addresses public health and wellbeing in a more integrated and systematic manner.
- 2.24 Levels of public transport accessibility differ across neighbourhoods, and some areas suffer from very poor levels of service. This contributes to a reliance on private car use and causes traffic congestion, along with environmental issues such as pollution and carbon emissions. The Local Plan will need to ensure improvements to public transport services are provided, that accessibility is increased, and that there is a reduced need for people to travel long distances. This will require a coordinated approach to investment in transport infrastructure and the public realm, alongside the provision of a better connected network of high quality town centres and local destinations to reduce the need to travel by car, and the creation of compact neighbourhoods.
- 2.25 Lewisham has many diverse places, neighbourhoods, and communities shaped by the Borough's varied history and cultural development. To accommodate growth and investment in a coordinated manner the local plan will need to carefully consider the existing

character of local places and neighbourhoods, and the mixed and diverse communities that make Lewisham so unique. The Local Plan will set a spatial strategy that will coordinate growth and investment across the different places and neighbourhoods of Lewisham, informed by an analysis of character in the different parts of the Borough.

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





# 3 VISION, STRATEGIC OBJECTIVES AND THE SPATIAL STRATEGY

Vision for Lewisham .....	48
Strategic objectives .....	49
Towards a new spatial strategy.....	52
Key considerations.....	52
Spatial strategy options .....	58
The preferred approach.....	62
OL1 Delivering an Open Lewisham (spatial strategy) .....	65

## Vision for Lewisham

- 3.1 The Local Plan is focussed on the aspiration to realise the 'Vision for Lewisham':

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

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

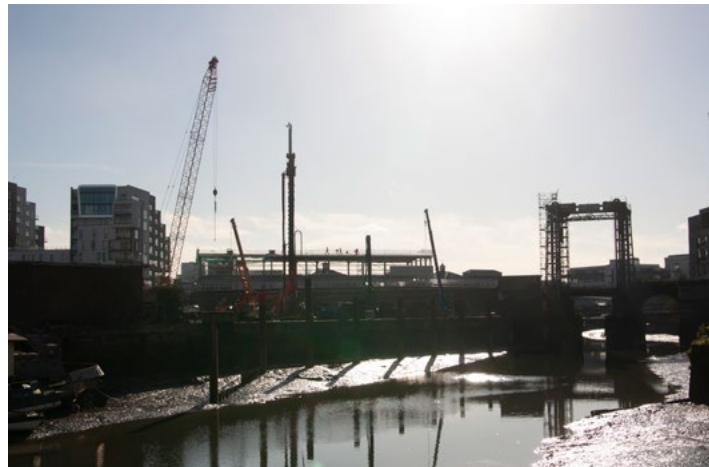
Lewisham will continue to be a dynamic place, reflecting the strength of its communities, and partnership working with our community remains at our core. We are proud of the vibrancy of our high streets, local businesses, arts and cultural establishments, our evening and night-time economy and our world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

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



## Strategic objectives

- 3.3 The following sub-section sets out the strategic objectives for the Local Plan. The objectives help to form a link between the Vision for Lewisham and the spatial strategy. They are set in the context of the key challenges facing the Borough now and over the long-term, and represent the main delivery outcomes sought through the implementation of Lewisham's Local Plan.
- 3.4 The strategic objectives have been informed by and reflect many of the key documents prepared by the Council, including the Corporate Strategy 2018-2022, along with those published by our partners and other key stakeholders.
- 3.5 An overarching objective for "An Open Lewisham as part of an Open London" helps to frame the strategic objectives, which are presented across nine themed topic areas. The objectives have been set out this way for organisational purposes and are not listed in order of priority. Many of the individual objectives are crosscutting in that they address more than one of the topic areas.





<b>A</b>	<b>AN OPEN LEWISHAM AS PART OF AN OPEN LONDON</b>
<b>1</b>	Sustain and create inclusive neighbourhoods and communities that both reflect and reinforce the diversity and cultural heritage of Lewisham's people and places, by coordinating investment in such a way as to promote equality of opportunity for everyone to enjoy a good quality of life in Lewisham.
<b>B</b>	<b>HOUSING TAILORED TO THE COMMUNITY WITH GENUINELY AFFORDABLE HOMES</b>
<b>2</b>	Proactively respond to population growth and help to meet London's housing need by positively managing the delivery of new homes across the Borough.
<b>3</b>	Ensure Lewisham's existing and future residents benefit from good access to a wide range and mix of high quality housing, including genuinely affordable housing that is tailored to meeting the varying needs of the community, including the needs of those from all age groups at different stages of life, families and those with specialist housing requirements.
<b>4</b>	Foster and help to reinforce community cohesion through the provision of housing that enables individuals and households to both settle in the local area and remain rooted to it.
<b>C</b>	<b>A THRIVING LOCAL ECONOMY THAT TACKLES INEQUALITIES</b>
<b>5</b>	Strengthen Lewisham's role in the wider London economy by expanding the local business base, through steering investment to town centres and other employment hubs and supporting the growth of sectors in which the Borough maintains or is poised to perform a key role, including the cultural, creative and digital industries.
<b>6</b>	Increase the number and variety of local jobs and business opportunities, by making the best use of employment land and providing suitable space to support businesses of all sizes, along with securing affordable workspace and workplace training opportunities.
<b>7</b>	Ensure town and local centres remain the focus for community activity and harness their unique attributes to support growth, including in retail, business and cultural activities – with a thriving evening and night-time economy – through investment to secure Lewisham centre's future role as a regionally important Metropolitan centre, to deliver regeneration in Catford Major centre and to support the vitality of town centres elsewhere.
<b>D</b>	<b>A GREENER BOROUGH</b>
<b>8</b>	Help London to achieve National Park City status and ensure all Lewisham residents benefit from access to high quality green space, by protecting, enhancing and connecting the Borough's network of parks, open and water spaces, including through delivery of a Green Grid to improve linkages to and between these spaces.
<b>9</b>	Promote and protect the ecological, biodiversity and amenity value of the Borough's natural assets – including trees, green spaces and water spaces – and seek to enhance existing assets or make new provision through new development wherever opportunities arise.
<b>10</b>	Manage waste responsibly by prioritising implementation of the most sustainable options in the waste hierarchy and safeguarding appropriate sites for the Borough to meet its strategic waste apportionment requirement.
<b>E</b>	<b>RESPONDING TO THE CLIMATE EMERGENCY</b>
<b>11</b>	Realise long-term reductions in energy use and carbon emissions in helping London to become a zero carbon city by 2050, by increasing the use of sustainable transport modes – including walking and cycling – ensuring that new development is designed to reduce car use and maximise energy efficiency, along with integrating greening measures to limit the urban heat island effect.
<b>12</b>	Guard against the risk of flooding by ensuring that new development is appropriately located, implementing sustainable drainage systems, retaining and enhancing flood defences including through river restoration works, along with improving the water quality of the rivers Thames, Ravensbourne, Quaggy and Pool.

<b>F</b>	<b>CELEBRATING OUR LOCAL IDENTITY</b>
<b>13</b>	Retain, reinforce and help shape the distinctive character and identity of Lewisham's communities and townscapes by ensuring that all new development responds positively to the special attributes of its local context – including the cultural, historic, built and natural environment – and is designed, constructed and maintained to a high quality standard.
<b>14</b>	Make the optimal use of land to facilitate the regeneration and renewal of localities within the London Plan Opportunity Areas at Deptford Creek / Greenwich Riverside and New Cross / Lewisham / Catford, and at key growth locations elsewhere, and through this process manage change to reinforce and build upon local character, whilst delivering transformational improvements to the environment including in the wider Thames-side area.
<b>15</b>	Set a positive framework for conserving and enhancing the historic environment, and promoting understanding and appreciation of it, including by working with neighbouring authorities and other stakeholders to sustain the value of local heritage assets and their setting, along with the Outstanding Universal Value of the Maritime Greenwich World Heritage Site.
<b>G</b>	<b>HEALTHY AND SAFE COMMUNITIES</b>
<b>16</b>	Address the wider determinants of physical and mental health and deprivation in an integrated and systematic way to improve the wellbeing of the population, to reduce health and other inequalities particularly where these are geographically concentrated, and to give children and young people the best start in life.
<b>17</b>	Create an environment that encourages and enables people to pursue active and healthy lifestyles irrespective of their age, ability or income, including by promoting the Healthy Streets principles, making provision for accessible leisure and recreation opportunities and protecting the amenity of residents and visitors, particularly from pollution.
<b>18</b>	Promote cohesive and liveable communities by ensuring mixed and balanced neighbourhoods where development is carefully integrated and designed to secure high quality, legible and permeable spaces that are inclusive and easy to access by everyone.
<b>19</b>	Create safer neighbourhoods and improve perceptions of safety by ensuring the built environment comprises of welcoming spaces and places and that new development both designs out crime and improves resilience to emergencies.
<b>H</b>	<b>SECURING THE TIMELY DELIVERY OF INFRASTRUCTURE</b>
<b>20</b>	Provide the essential physical, community and green infrastructure needed to support growth and sustainable places, by coordinating investment and securing the timely delivery of new infrastructure, including through the use of Community Infrastructure Levy funding and planning contributions.
<b>21</b>	Work in partnership with central government, the Greater London Authority, Transport for London, Network Rail and other stakeholders to increase public transport capacity and accessibility across the Borough, as well as to unlock the development potential of specific localities and strategic sites, including through delivery of the Bakerloo Line Extension.
<b>I</b>	<b>ENSURING HIGH QUALITY EDUCATION, HEALTH AND SOCIAL CARE</b>
<b>22</b>	Ensure that all Lewisham residents benefit from access to high quality education, health and social care by protecting and planning for facilities to meet local needs and working with stakeholders, including the NHS, to support innovative approaches to delivering services.

## Towards a new spatial strategy

- 3.7 The Local Plan will set out a spatial strategy to facilitate the delivery of Good Growth in Lewisham. The spatial strategy provides a clear direction for the development and use of land across the Borough over the long-term. The spatial strategy is also a vital tool used by the Council, its partners and other key stakeholders to guide decisions on investment, particularly for infrastructure and services.
- 3.8 The following section sets out some of the key considerations informing the preparation of the spatial strategy for the Borough.<sup>18</sup> It then discusses the spatial strategy options that are being explored for the Local Plan. Finally, the section sets out the 'preferred approach' for the spatial strategy, which is detailed in draft Policy OL1 (Delivering an Open Lewisham).

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<sup>18</sup> The Lewisham Local Plan Integrated Impact Assessment (IIA) – Interim Report (2020) should be referred for further information on the considerations informing the spatial strategy options.

## Key considerations

### Growth requirements

- 3.9 The spatial strategy addresses the amount and distribution of development across the Borough. Lewisham's future growth requirements provide a useful starting point for considering spatial options. The Council must plan positively to meet identified development needs, including for housing, workspace and space to accommodate main town centre uses (such as retail floorspace and community facilities). Like the rest of London, Lewisham has gone through a period of rapid growth and this is expected to continue. Many more new homes must be built to meet the needs of a growing population.<sup>19</sup> There are also pressing needs for new business space to support and grow the local economy.<sup>20</sup> In order to ensure these needs are addressed the Local Plan must help to facilitate a significant amount of new development.

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<sup>19</sup> The draft London Plan sets a target for Lewisham of 1,667 net new homes per year. Alternatively, a Local Housing Need (LHN) figure calculated using the method set out in the NPPF suggests a minimum housing need figure of 2,964 net units per year.

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<sup>20</sup> There is an estimated demand for approximately 5,300 net additional square metres of retail floorspace up to 2030 and 21,800 net additional square metres of employment floorspace up to 2038.

## London Plan

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

## Character-led growth

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

## Green and open spaces

- 3.12 Green and open spaces are vital to the Borough, its people and the environment and will continue to be protected in line with the London Plan and the NPPF. The network of green infrastructure is shown in. As part of the Local Plan review we have carried out assessments of these spaces<sup>21</sup> to understand whether it would be appropriate to make adjustments to the extent of existing boundaries, as well as to designate or de-designate sites.

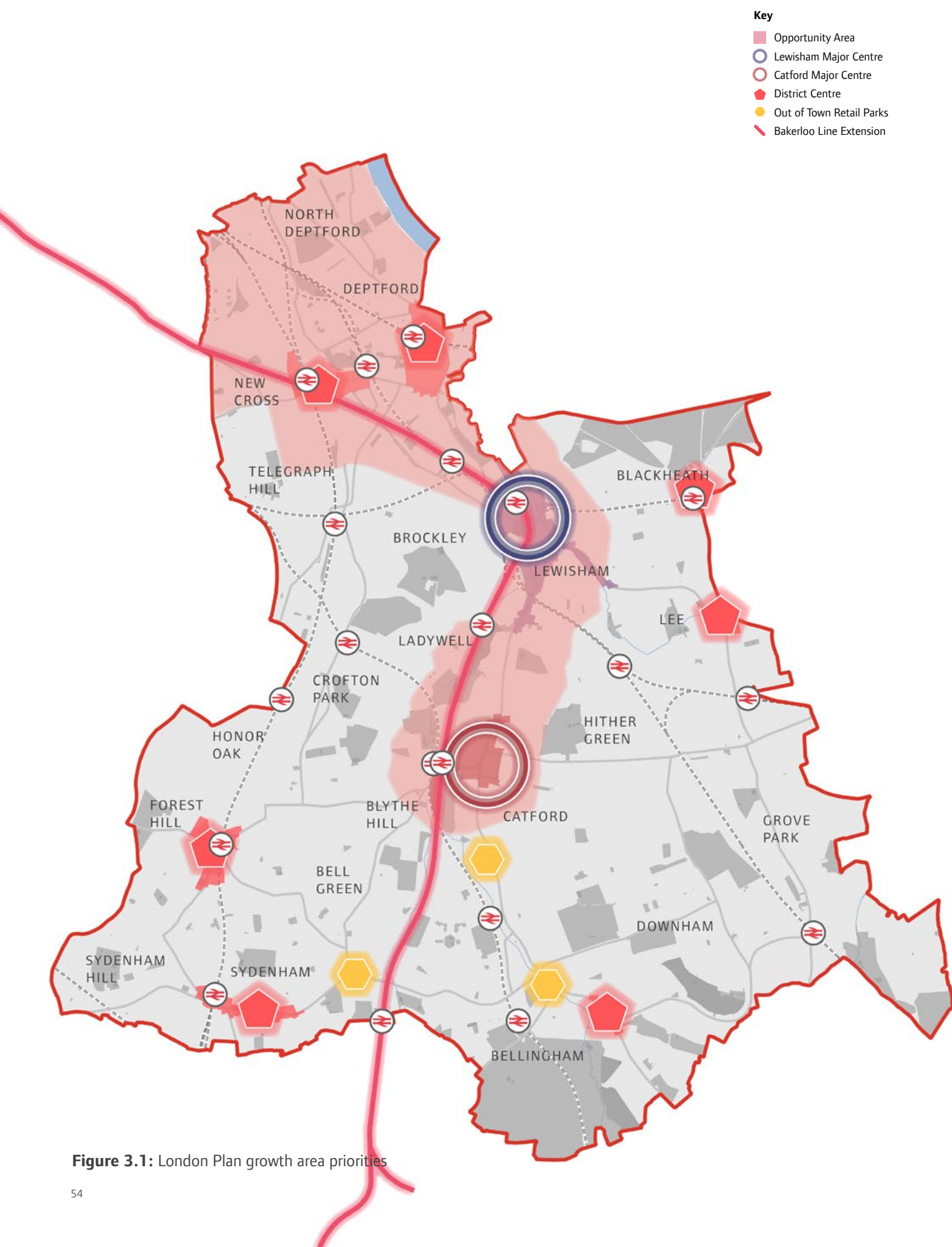
## Potential development sites

- 3.13 We have carried out an assessment to identify land that might be available to accommodate new development for a range of uses, as well as the capacity of these sites.<sup>22</sup> As part of this, we have invited the public to identify sites for consideration through 'call for sites' exercises. We have also worked with the Mayor of London on a Strategic Housing Land Availability Assessment (SHLAA). A sufficient supply of readily developable sites is crucial to ensuring the Local Plan is deliverable. Figure 3.4 shows the package of strategic sites that we have currently identified.<sup>23</sup>

<sup>21</sup> These assessments include the Lewisham Metropolitan Open Land Review (2020), Lewisham Parks and Open Space Assessment (2019) and Re-Survey of Sites of Importance for Nature Conservation in Lewisham (2016).

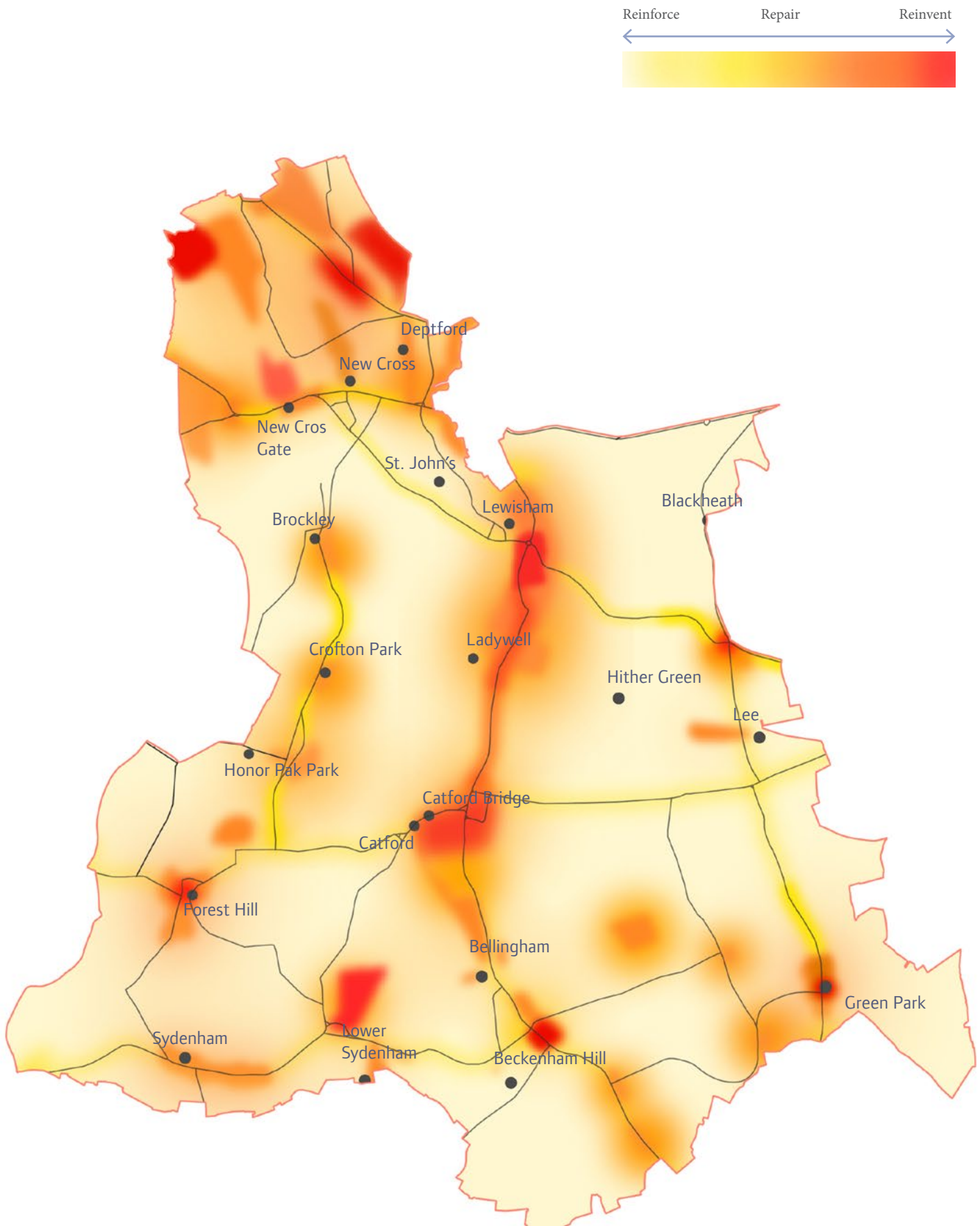
<sup>22</sup> Further information is set out in the Lewisham Local Plan: Site Allocations Background Paper (2020).

<sup>23</sup> The 'strategic' sites are mainly 0.25 hectares or greater in size.

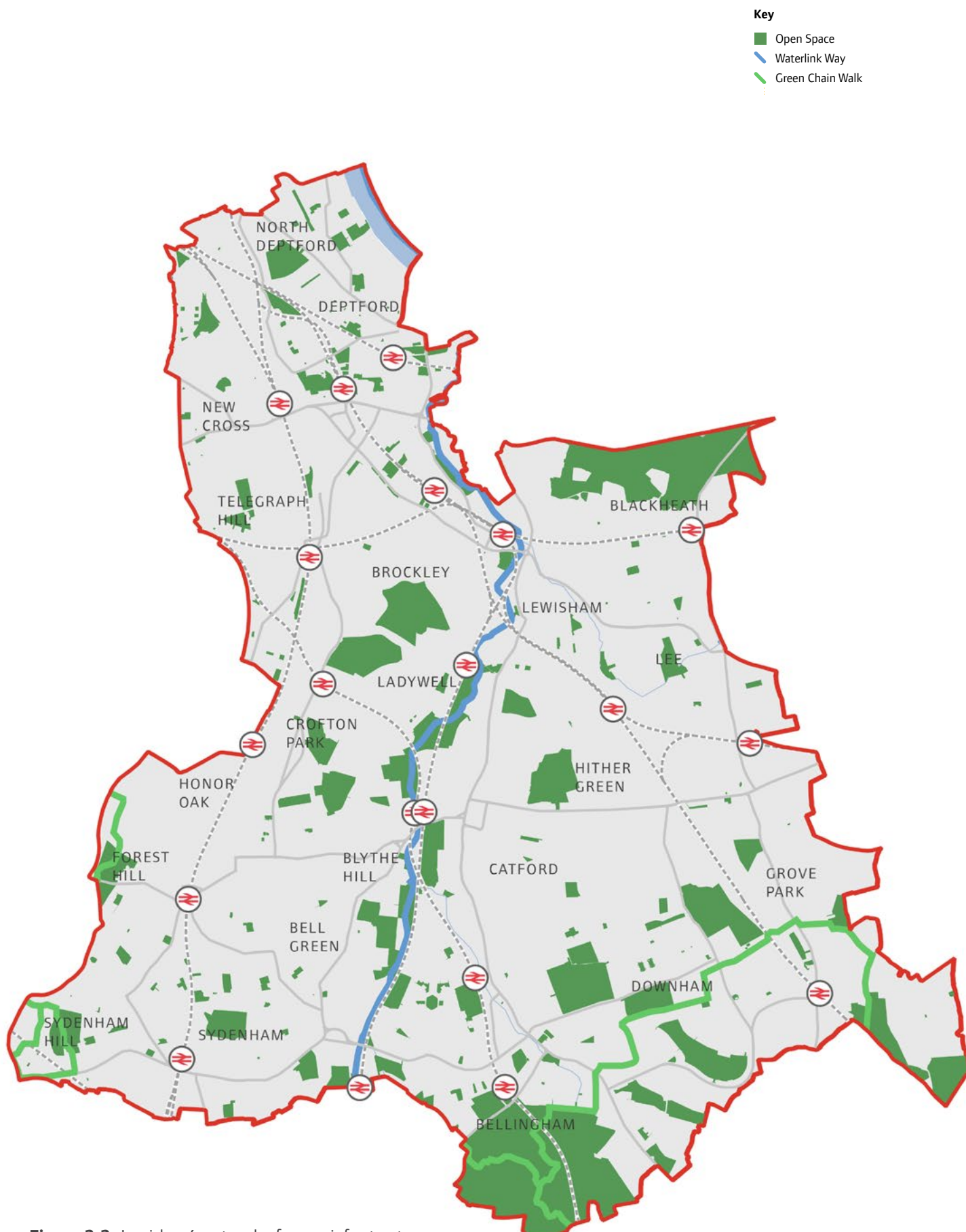


**Figure 3.1:** London Plan growth area priorities






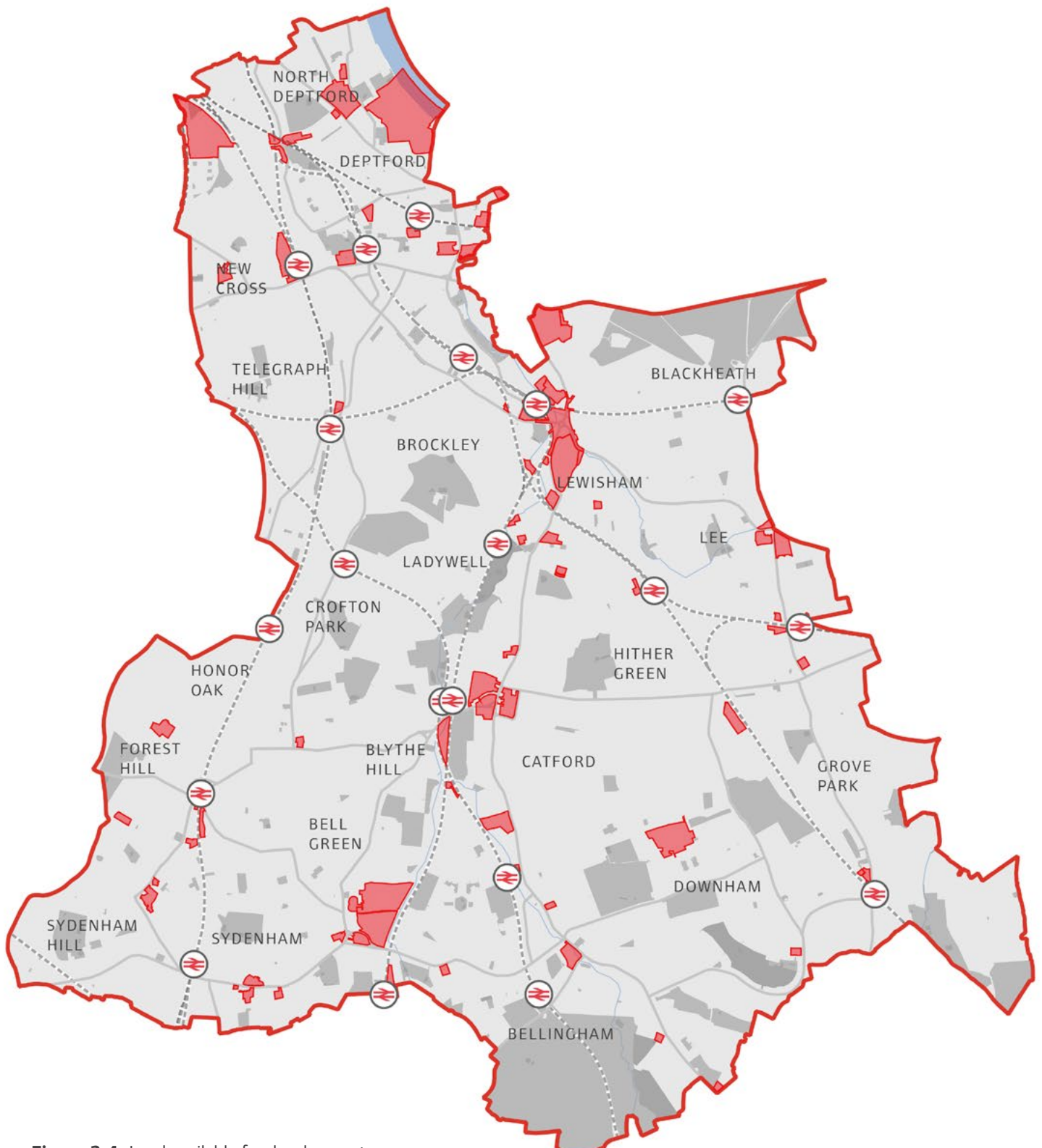
**Figure 3.2:** Lewisham character-led growth strategy from the Lewisham Characterisation Study, 2018



**Figure 3.3:** Lewisham's network of green infrastructure



## Key

 Site Allocation


**Figure 3.4:** Land available for development

## Spatial strategy options

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

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

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

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

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

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


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


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



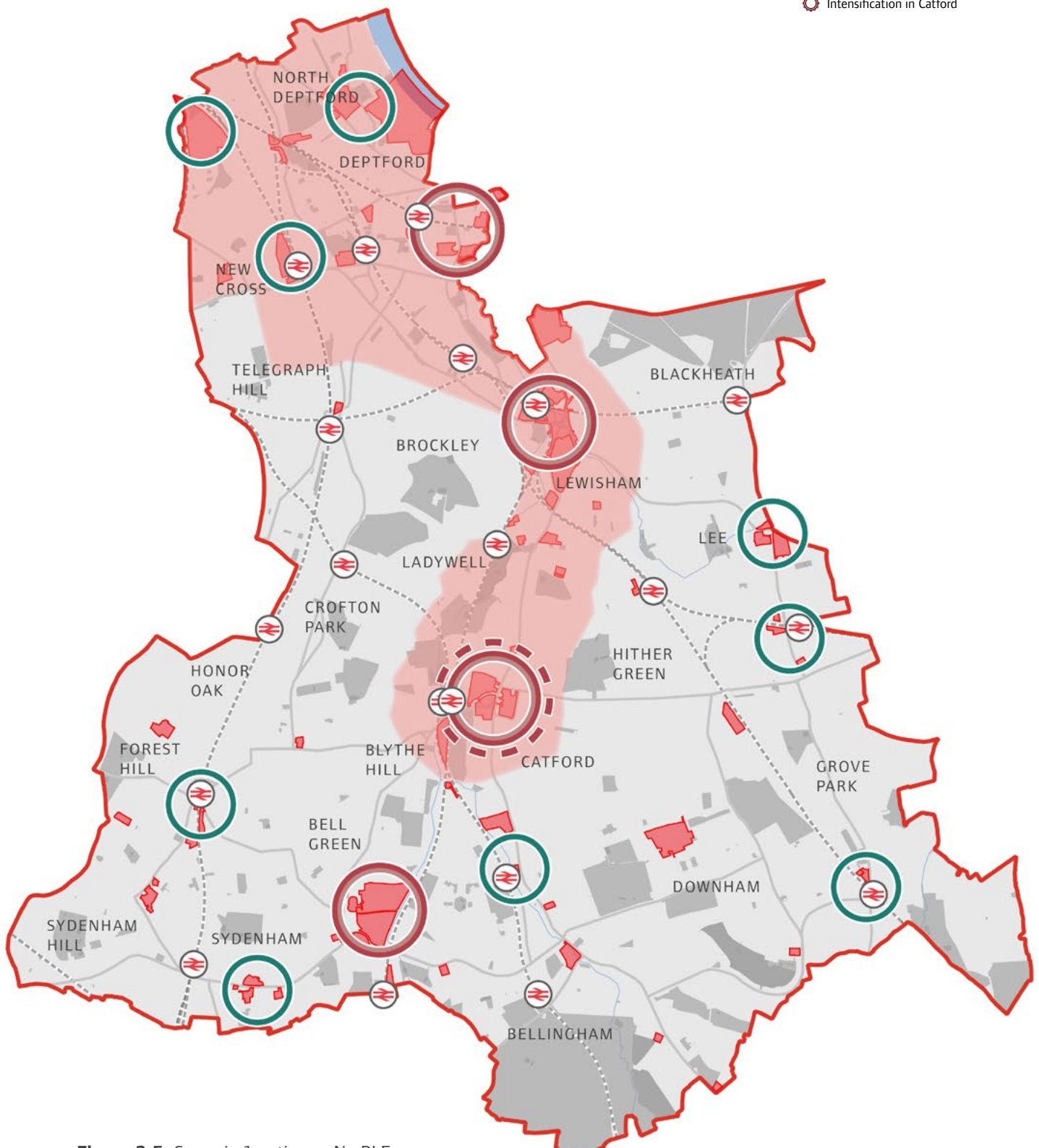
**Figure 3.7** Spatial options 3a and 3b (BLE Phase 1 and 2)

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

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

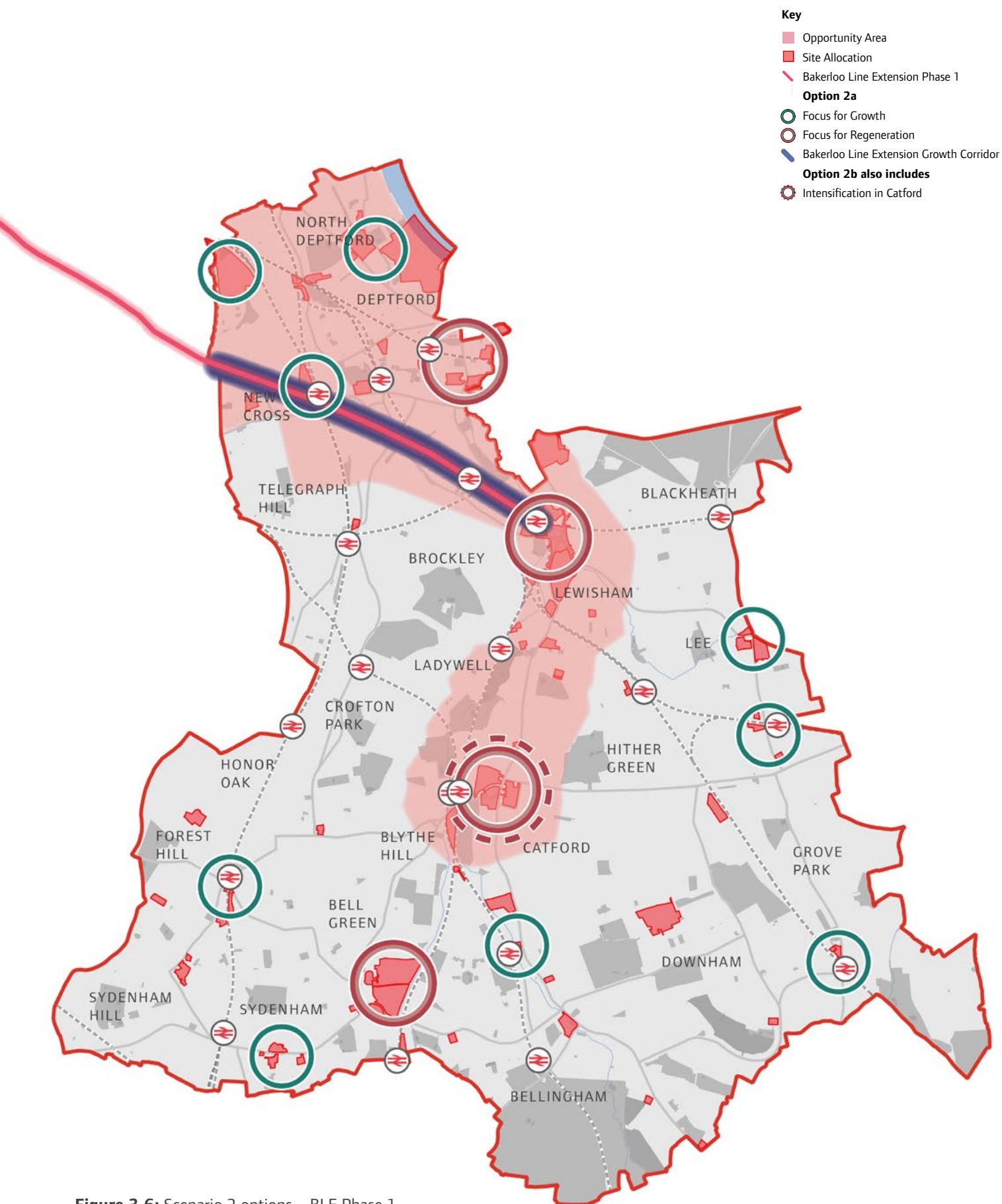
**Key**
 Opportunity Area

 Site Allocation
**Option 1a**
 Focus for Growth

 Focus for Regeneration
**Option 1b also includes**
 Intensification in Catford


**Figure 3.5:** Scenario 1 options – No BLE





**Figure 3.6:** Scenario 2 options – BLE Phase 1

**Key**

Opportunity Area

Site Allocation

Bakerloo Line Extension Phase 1 and 2

**Option 3a**

Focus for Growth

Focus for Regeneration

Bakerloo Line Extension Growth Corridor

Intensification in Catford

Intensification in Bell Green

**Option 3b also includes**

\* Additional intensification in Bell Green

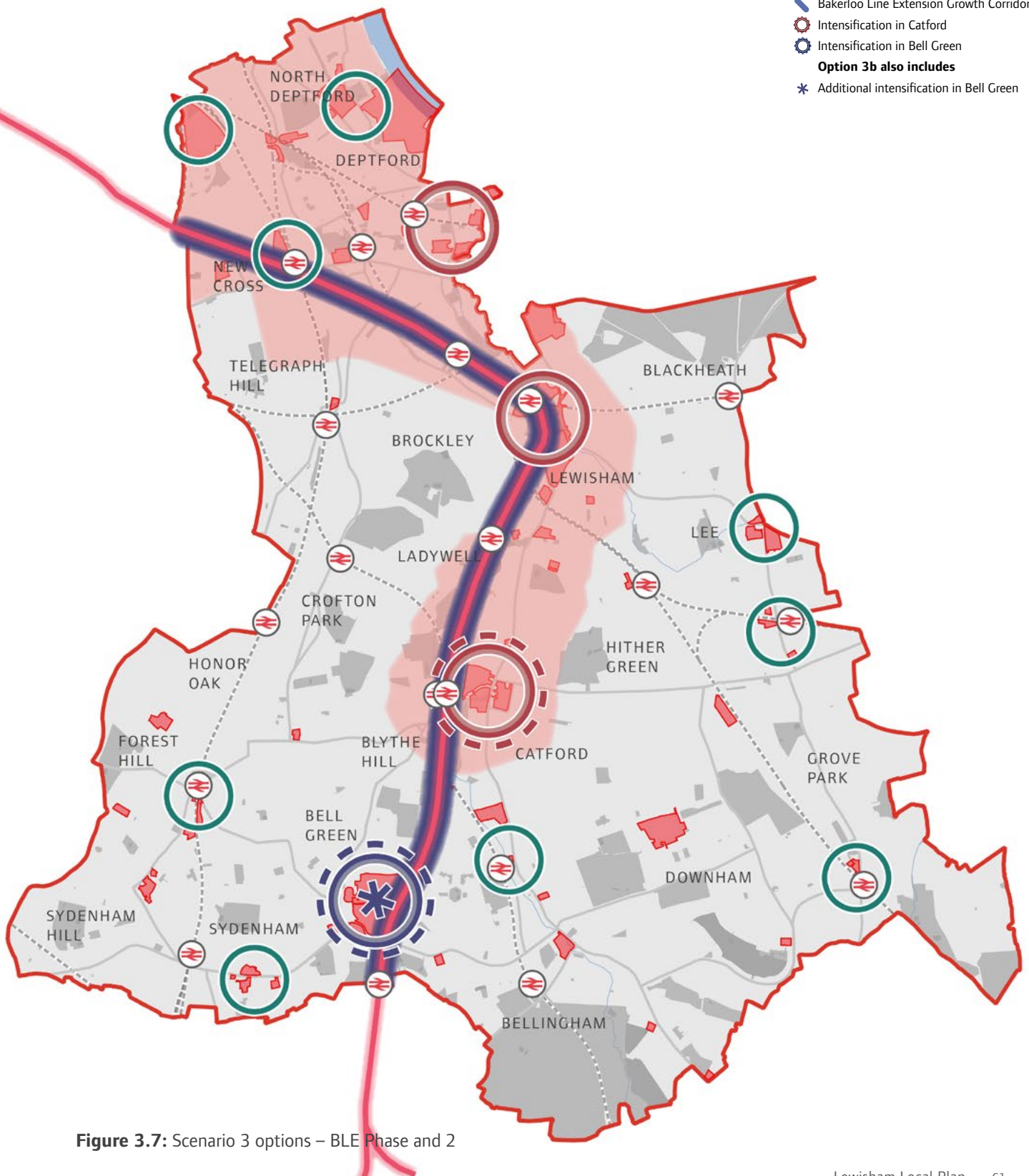


Figure 3.7: Scenario 3 options – BLE Phase and 2

## The preferred approach

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



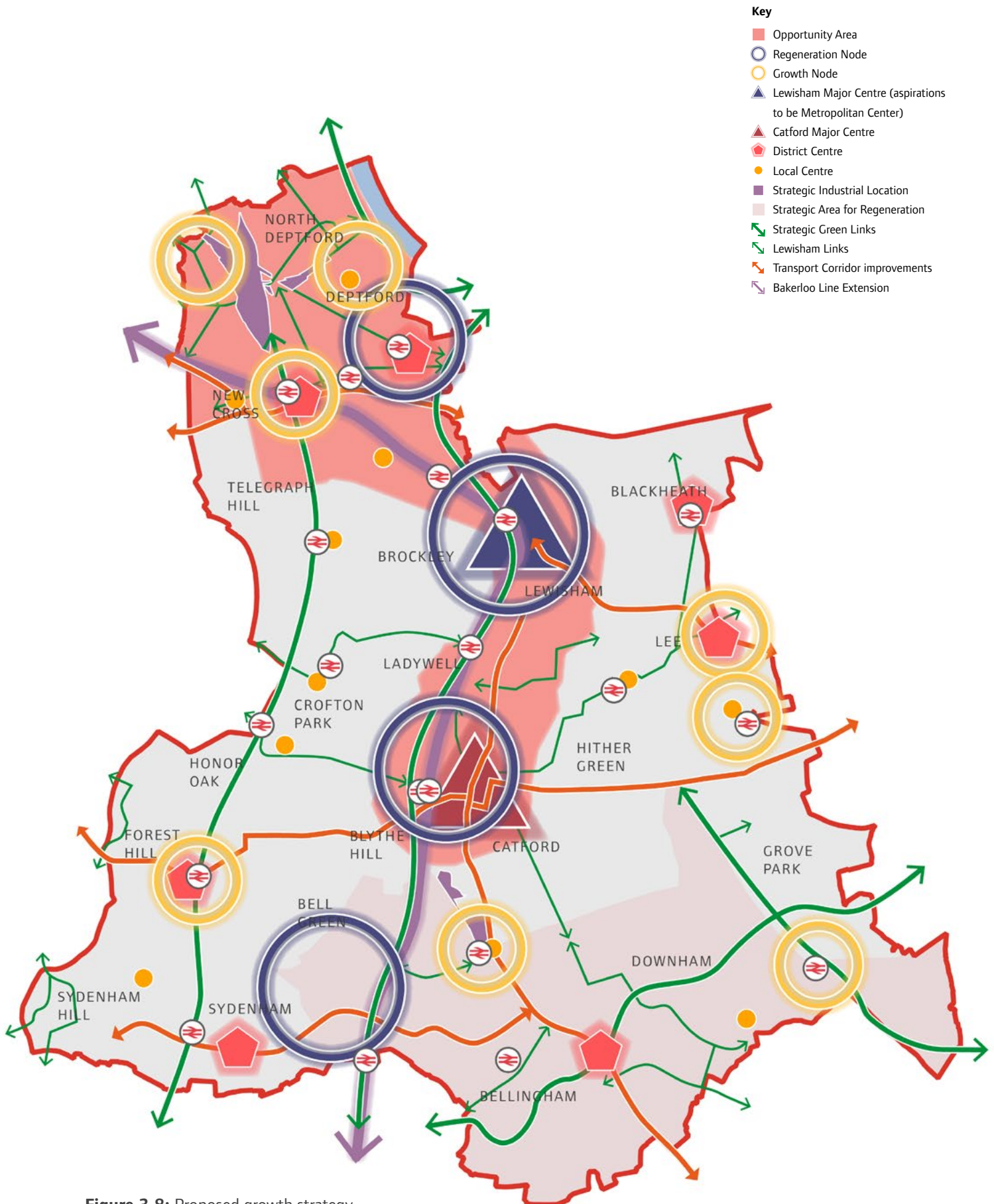
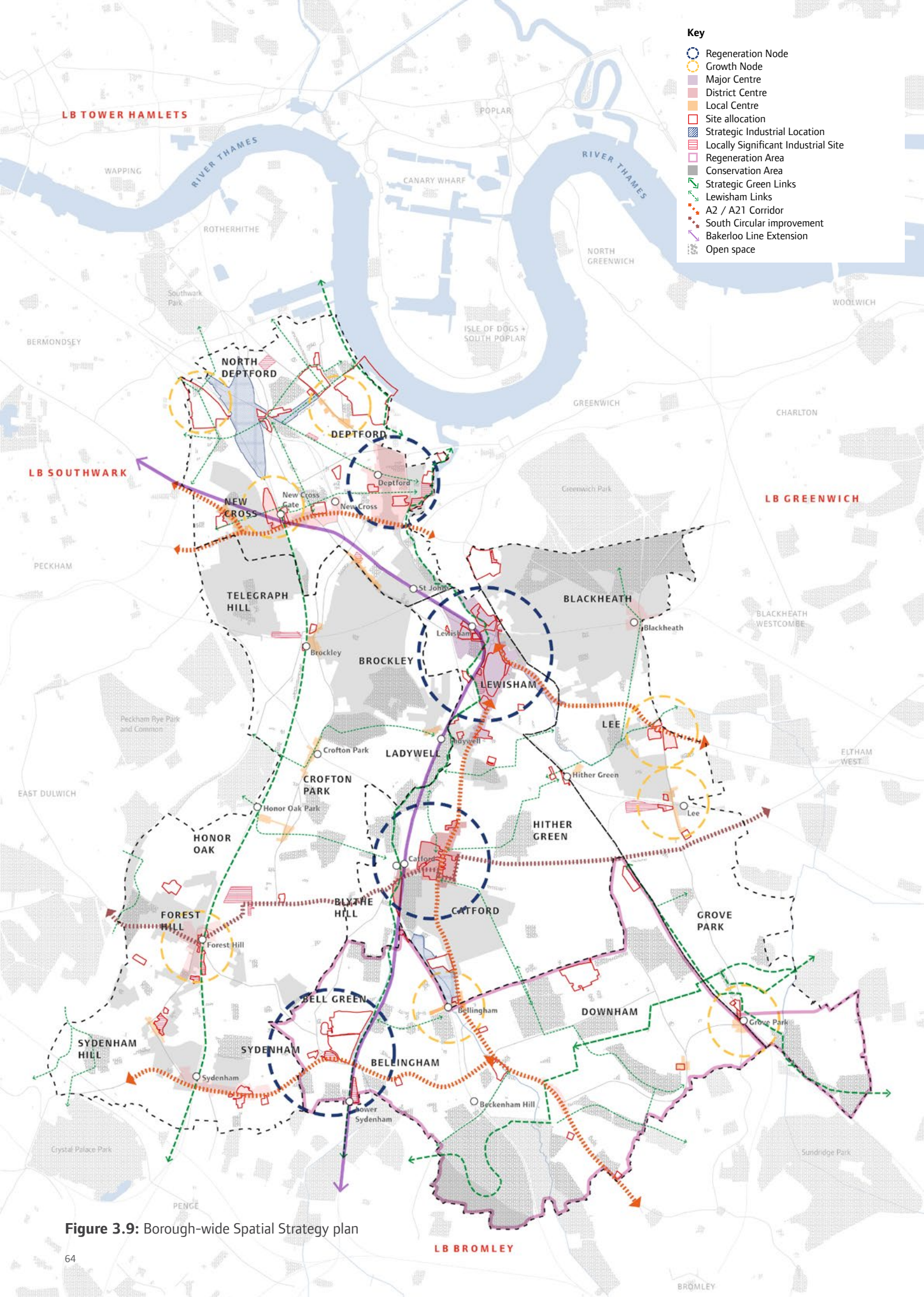


Figure 3.8: Proposed growth strategy





## OL1 Delivering an Open Lewisham (spatial strategy)

- A The Council will work positively and alongside local communities and community groups, public and private sector stakeholders, development industry partners and the wider public to realise the Vision for Lewisham, and to deliver the strategic objective for 'An Open Lewisham as part of an Open London' by:
- a. Ensuring that the growth and regeneration potential of Lewisham's London Plan Opportunity Areas are fully realised, specifically at New Cross / Lewisham / Catford and Deptford Creek / Greenwich Riverside, including by preparing and implementing local area frameworks, such as the New Cross Area Framework and the Catford Town Centre Master Plan;
  - b. Directing new investment to the Borough's strategic Area for Regeneration, and other local areas for regeneration, and coordinating the delivery of this investment to help tackle deprivation and ensure equality of opportunity;
  - c. Promoting a vibrant and diverse multi-centred Borough by directing new residential, commercial, community, leisure and cultural development to Lewisham's town and local centres in order to support their vitality and long-term resilience, and through this process:
    - i. Enable Lewisham town centre to cement its position as a centre of sub-regional significance and achieve metropolitan centre status;
    - ii. Facilitate the comprehensive regeneration of Catford major town centre to reinforce its role as the principal civic and cultural hub within the Borough; and
    - iii. Ensure the district town centres at Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross and Sydenham retain their distinctive features whilst evolving in their function as key hubs of community, cultural and commercial activity;
  - d. Facilitating new development along the north-south A21 corridor (Lewisham High Street, Rushey Green and Bromley Road) and other strategic corridors (such as the east-west New Cross Road / A2 corridor) as well as around principal transport routes, nodes and interchanges, to support growth and enhance the quality of places. This includes improvements to better link Lewisham's town centres and neighbourhoods with each other and those in adjoining Boroughs, using the Healthy Streets approach;
  - e. Working with partners to deliver new and improved community and strategic transport infrastructure, including the Bakerloo Line extension, as a catalyst for investment and to unlock the development potential of the Borough. This is particularly in the London Plan Opportunity Areas and Lewisham's southern areas, where interventions and transformational change can positively address inequalities and local deprivation. Over the long-term, the delivery of infrastructure will support the designation of a new Opportunity Area at Bell Green and Lower Sydenham in the London Plan.
  - f. Proactively seeking to make the best use of land and space, and prioritising the

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redevelopment of brownfield land for new housing and workspace, along with optimising the development of strategic sites and other smaller sites across the Borough, including through their sensitive intensification;

- g. Requiring all new development to be delivered through the design-led approach and informed by an understanding of local area character (including the historic, cultural, natural and built environment), to enhance local distinctiveness, and to help secure liveable, walkable, healthy and safe communities that are inclusive to all;
- h. Protecting, enhancing and connecting Lewisham's network of green infrastructure (including trees, parks and open spaces, water spaces and biodiversity), as well as improving the population's access to it through walking and cycling, as an integral component of Good Growth along with ensuring that all new development responds to the climate emergency, with measures for climate change adaptation and mitigation.



## Explanation

- 3.21 This policy is the overarching strategic policy for the Local Plan and is the starting point for achieving the Vision for Lewisham. It sets out the spatial strategy for the Borough, which is the land use and planning framework for the Council and its partners to manage growth and guide investment over the next 20 years. The spatial strategy directly addresses the Local Plan objectives, including the overall objective of 'An Open Lewisham as part of an Open London'.
- 3.22 This policy is also the platform for the remainder of the Local Plan. All of the other plan policies emanate from this principal policy and provide further details and guidance to assist with its implementation. It is an important reference point for all future planning proposals and establishes the strategic land use priorities that new developments will be expected to engage with.
- 3.23 Finally, the policy helps to address the 'Good Growth' policies set out in the draft London Plan. Lewisham has an important role to play in helping to deliver the London Mayor's vision for the Capital. London's future prosperity is very much dependent on coordinated planning of infrastructure and development. This requires Lewisham Council and other local authorities, along with key stakeholders, to work together to realise sustainable and equitable growth both within and across their administrative boundaries. The policy establishes a critical link between the Local Plan and the London Plan. It helps to ensure that Lewisham's growth is managed in line with the spatial development strategy for the region.

### Realising Opportunity Area objectives



New development at Hayward Mews, adjacent to the railway line at Crofton Park



Lewisham DLR Station

3.24 The London Plan identifies two Opportunity Areas within Lewisham that have significant potential to accommodate new investment along with growth in homes and jobs. These are also areas where neighbourhoods, businesses and local residents stand to benefit from focussed regeneration and urban renewal, particularly where deprivation is experienced. These benefits will be realised through the delivery of more healthy and liveable neighbourhoods. This includes more genuinely affordable homes, new workspace, high quality community facilities and transport infrastructure, along with public realm and environmental improvements. The Opportunity Areas comprise the New Cross / Lewisham / Catford corridor and the area at Deptford Creek / Greenwich Riverside. In recent years there has been a significant amount of investment in these areas, which has been steered by the local planning framework. A number of strategic development sites have now been delivered or are expected to come forward soon, with planning consent granted or construction started. The areas have also benefited from the delivery of new or improved transport infrastructure, public realm and community facilities.

3.25 We will continue to seek to deliver the objectives for the Opportunity Areas through the Local Plan, working with the Greater London Authority and other key stakeholders alongside development industry partners and local communities. Additional guidance has been prepared to identify future priorities and opportunities for development and area improvements, including the New Cross Area Framework and the Catford Town Centre Masterplan. The Local Plan reflects this guidance through the spatial strategy and



The Green Man community building

other policies. All future development proposals will be expected to positively engage with the Local Plan and its associated guidance to ensure the Opportunity Areas fully realise their potential, whilst taking account of local area requirements.

### **Tackling deprivation and ensuring equality of opportunity**

3.26 It is vitally important that everyone is able to enjoy a good quality of life in Lewisham irrespective of their background, age or ability. We are committed to ensuring that local residents and others are able to benefit from excellent access to high quality and genuinely affordable housing, education and training, and job opportunities, as well as a wide range of community facilities such as parks and health services. Whilst there are many prosperous neighbourhoods in Lewisham there are some localities where access to social and economic opportunities is more limited, and where the impacts of inequality and causes of deprivation



are concentrated. Some of these localities are within the 20 per cent most deprived in the country, including in Lewisham's southern neighbourhoods. The Local Plan sets a proactive strategy to coordinate and direct new investment to these areas. It also highlights for our stakeholders and delivery partners the need for targeted interventions to tackle the specific causes of deprivation and to ensure equality of opportunity. This includes investment and supporting programmes in Opportunity Areas as well as the Strategic Area for Regeneration, whether linked to capital or revenue funding. Further details on the strategic approaches to tackle deprivation through the Local Plan are set out in Part Three.

### **A vibrant and diverse, multi-centred borough**

3.27 The Local Plan seeks to promote Lewisham as a multi-centred, or polycentric, Borough. This is one that is defined by a well-connected network of complementary, thriving and resilient town centres which act as hubs both serving and linking local communities. This pattern of development is advocated to facilitate and better balance growth as well as to redress the distribution of investment locally, ultimately, to promote and improve equality of opportunity across Lewisham.

3.28 This policy seeks to direct new development to the Borough's town and local centres and their immediate surroundings, especially the major and district centres. These are locations that already benefit from higher levels of public transport accessibility and transport interchanges, along with a core of services and community facilities. Furthermore, there are opportunities to secure

the long-term viability of these centres through the introduction of a wider range of uses, including housing, workspace, cultural and community facilities. The Local Plan seeks to optimise the use of land available in and around town centres. This includes diversifying and intensifying uses within them whilst ensuring that the scale of development is commensurate with, and helps to reinforce, a centre's role and function.

3.29 For this approach to be successful it is imperative that town centres complement and support but do not compete with one another. Therefore,



Catford town centre





Catford Green, Catford



Cornmill Gardens, Lewisham



Forest Hill Library and Pools, Forest Hill



the Local Plan seeks to build on the unique attributes, character and function of each of the Borough's town and local centres. As these centres will be key focal points for development and investment they are expected to evolve over time, responding to the challenges facing our high streets and becoming even more liveable, vibrant and resilient places.

- 3.30 There are key opportunities at the major town centres of Lewisham and Catford, both of which are located within the Opportunity Area. The London Plan indicates that Lewisham major centre has the potential to be designated as a metropolitan centre in the future. This is owing to its growing influence in the wider sub-region as a transport interchange as well as a significant hub of commercial and community activities. We will seek to facilitate development in such a way as to position the centre to secure this metropolitan centre status within the plan period.
- 3.31 We will also seek to deliver the comprehensive regeneration of Catford major centre as a strategic priority. Catford will continue to play an important complementary role to Lewisham as the principal civic centre in the Borough, supported by its unique cultural offer along with opportunities to deliver additional housing, commercial floorspace and transformational public realm improvements. We have prepared the Catford Town Centre Masterplan to set a future framework and implementation programme for the centre, which should be considered alongside the Local Plan.
- 3.32 Elsewhere, the Borough's district centres will be the focus for growth, renewal and sensitively managed change, aided by investment

in strategic infrastructure and other area improvements. This includes the district town centres of New Cross, Deptford, Downham, Lee Green, Forest Hill and Sydenham. Local Centres will also be required to play an integral role in supporting Lewisham's linked network of centres.

### **Connecting communities: corridors for movement and improvement**

- 3.33 To achieve a successful multi-centred Borough it is vital that there are legible, high quality, safe and efficient routes both to and between town centres and neighbourhoods. Crucially, such routes must support sustainable modes of movement by giving priority to walking, cycling and the use of public transport. The future prospects and viability of Lewisham's town centres will rely heavily on their capability to be accessed safely and easily by all residents, workers and visitors. Also, with a well-connected town centre network, individual centres will be better placed to sustain or evolve their specific roles as the population is enabled to use them with more regularity.
- 3.34 The London Plan Opportunity Areas define a central growth corridor in Lewisham, which covers a large area to the north of the Borough and extends southward taking in the town centres at New Cross, Lewisham and Catford. This corridor features a principal road network, centred on the A21 corridor (Lewisham High Street, Rushey Green and Bromley Road). Elsewhere there are several strategic roads linking town centres and neighbourhoods both within and beyond the Borough boundary. These roads include: the A20 (an historic east-west route from central London to Kent and the south east); the A205 South Circular (an orbital route from



Woolwich to Chiswick, traversing Lee, Catford and Forest Hill); and the A212 (which links the South Circular to Croydon).

- 3.35 At present these strategic roads prioritise vehicular flows, or their 'link' function, above any 'place' function and potential contribution they may make to the quality of the neighbourhoods and centres they connect with and move through. In addition, the particular qualities of the strategic roads (such as their width and environmental quality) means that they possess their own spatial character as 'corridors' and can therefore appear incongruous with the areas they traverse. There is an opportunity for greater intensification along strategic routes, where development responds to the status of the road and its greater degree of connectivity. Furthermore, the quality and functionality of these corridors can be improved through development delivering on the Healthy Streets principles - by give priority to movement by walking and cycling, as well as addressing vehicular dominance and reducing vehicle speeds. These principles are covered elsewhere in the plan, including Policy TR3 (Healthy streets as part of healthy neighbourhoods).

### **Strategic infrastructure: the catalyst for growth and investment**

- 3.36 In order to achieve the objective of an Open Lewisham it is imperative that all residents are able to share in the opportunities and benefits that growth and regeneration bring. We will therefore continue to work with key stakeholders and partners to deliver the essential infrastructure needed to support and enhance

our neighbourhoods. In addition, we will lobby for and seek to secure strategic infrastructure of the type that can act as a catalyst for growth and investment, and which can help the Borough to fully realise its development potential.

- 3.37 There are localities in the Borough, particularly where deprivation is experienced, which could benefit from the investment associated with new development. However opportunities are constrained owing to the lack of infrastructure provision, particularly transport infrastructure. We have prepared "A Vision for Rail"<sup>24</sup> that sets out our priorities to address identified gaps in such provision, and to ensure Lewisham is able to appropriately support London's growth. Of key significance is the Bakerloo line extension,



Deptford Carriage Ramp and Tinderbox House

<sup>24</sup> Lewisham Council - A Vision for Rail (2017)



which is supported by the draft London Plan. It is proposed that this Underground line is extended from Elephant and Castle to Lewisham via Old Kent Road and New Cross Gate. This would enable a further extension beyond Lewisham town centre, potentially bringing the Bakerloo Line to Hayes over the long-term, with stations at Ladywell, Catford and Lower Sydenham.

- 3.38 The Bakerloo line extension is essential to supporting Opportunity Area objectives and providing the necessary transport infrastructure to facilitate a significant uplift in homes and jobs in the New Cross / Lewisham / Catford corridor. Furthermore, the potential future extension of the Bakerloo line to the southern part of the Borough is imperative to enable transformative investment and managed change. In particular, the Bell Green and Lower Sydenham area is poised to benefit from such focused investment. This area currently exhibits some of the highest levels of deprivation locally, and within the highest 20% deprived nationally, and suffers from low levels of public transport accessibility. However, it also features a number of large sites offering significant development potential if brought forward in a strategically coordinated way. A future Opportunity Area is envisaged for this part of the Borough. The spatial strategy is set with the intent of facilitating investment as a catalyst for growth, to help realise long-term objectives for a more equitable distribution of development and opportunities across the Borough.

### **Making the best the use of land and space**

- 3.39 Lewisham will continue to play a role in accommodating London's future growth. Whilst

growth will bring many opportunities and new investment it will also lead to increasing and competing pressure on the use of land. In response to this situation, the Local Plan sets a framework to help ensure that the best use is made of the Borough's limited supply of land and space.

- 3.40 Making the best use of land will mean that land is used more efficiently and flexibly. This includes well-integrated, higher density and mixed-use development in appropriate locations. These locations are principally Lewisham's Opportunity Areas and town centres along with the strategic corridors for movement that connect these places. As well, a more intensive use of employment land and sites will be necessary to meet future needs for workspace and job opportunities.
- 3.41 Making the best use of land will also mean that land and space is used more effectively. This can be achieved through the shared use or co-location of facilities to better meet the needs of the people and groups who use them. A more effective use of land can also occur where buildings and spaces are designed to be adaptable to different users and offer opportunities for use at different times of the daytime, evening and week. The introduction of car-free or car-capped developments in highly accessible locations, such as town centres, together with high quality public realm can also provide for a more effective use of land.
- 3.42 Where appropriately located, higher density and mixed-use developments that respond positively to and enhance the character of the Borough's



town centres and neighbourhoods will be supported. This is to help secure their long-term vitality and viability by enabling a complementary cluster, or agglomeration, of uses to develop. A critical mass of people and activities is needed to both generate and support investment, such as for community facilities, public realm enhancements and other area improvements.

3.43 This policy seeks the redevelopment of brownfield land, or previously developed land, as a priority. This will ensure that Lewisham's green and open spaces are protected. The Local Plan includes a number of strategic site allocations where requirements have been set to ensure the optimal use of land. These allocations are largely set within the Opportunity Areas, town centres and strategic movement corridors where we will seek to focus development. Further details are set out in Part Three of this document dealing with Lewisham's character areas.

3.44 Elsewhere, the Local Plan will support the sensitive intensification of smaller sites throughout the Borough. The development of smaller sites (including on backland and infill sites, as well as residential extensions) will be important to meeting future needs, particularly for housing. We will prepare guidance documents to support the plan policies and to help ensure that development of this kind is appropriate to its location and wider setting.

### **Celebrating and enhancing Lewisham's distinctiveness**

3.45 Lewisham comprises many neighbourhoods and places, all of which have distinctive features. The historic, cultural, natural and built environment contributes significantly to shaping local character. It also influences how people experience the Borough and informs their sense of place and identity.

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

3.47 Lewisham has been shaped by its historical development. It will continue to evolve in the context of London's growth and new technological advances. However, respecting local character and accommodating change should not be seen as mutually exclusive. New development must help to reinforce the special characteristics of the Borough. At the same time, it should assist in repairing and re-shaping those elements of the built environment that could make a more positive contribution to the visual quality and liveability of our neighbourhoods.

The Lewisham Characterisation Study (2019) has been prepared by the Council in collaboration with the local community, and assists in setting out some of the defining features of the Borough. The study has been used to inform the Local Plan approach for integrated place making, including the planning priorities for Lewisham's neighbourhoods and areas. Part Three of the Local Plan sets out further details in this respect.

### **A greener, more resilient borough**

3.48 The Council takes seriously its responsibility to promote and secure sustainable development, as evidenced by our declaration of a climate emergency and commitment to prepare an action plan. Sustainable development means development that meets the needs of the present without compromising the ability of future generations to meet their own needs.<sup>25</sup> Environmental stewardship is an integral part of this. London's natural assets are an irreplaceable resource and need to be preserved and protected. However, they are coming under increasing pressure from human activity, including that which is contributing to global climate change.

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

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

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

<sup>25</sup> The Bruntland Report - Resolution 42/187 of the General Assembly of the United Nations