

# Integrated Impact Assessment (IIA) of the Lewisham Local Plan

IIA Report  
Non-technical Summary

November 2022

**Quality information**

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**Revision history**

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# Introduction

AECOM is commissioned to undertake Integrated Impact Assessment (IIA) in support of the emerging Lewisham Local Plan. Once in place, the Local Plan will establish a spatial strategy for growth, identify locations for development to deliver upon the strategy and establish the policies against which planning applications will be determined.

IIA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. IIA involves undertaking the legally required Sustainability (SA) process alongside: Equality Impact Assessment (EqIA), which is undertaken in order to discharge the Public Sector Equality Duty; and Health Impact Assessment (HIA) to have regard to the health impacts promote the reduction of health inequality.

Central to the IIA process is preparation of an IIA Report for publication alongside the Draft Plan. At the current time, the Draft ('Proposed Submission') Plan is published for consultation, and an IIA Report published alongside. This report is the Non-technical Summary (NTS) of the IIA Report.

## Structure of the IIA Report / this NTS

IIA reporting essentially involves answering the following questions in turn:

1) What has plan-making / IIA involved **up to this point**?

- including in relation to 'reasonable alternatives'.

2) What are the IIA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question: *What's the scope of the IIA?*

## What's the scope of the IIA?

The scope of the IIA is reflected in a list of topics and objectives. Taken together, this list indicates the parameters of IIA, providing a methodological 'framework' for assessment.

The IIA framework is presented within the table below.

*Table A: The IIA framework*

Topic	Objective
Air quality and pollution	Minimise air, noise and other forms of pollution and address existing areas of poor air quality and other pollution.
Biodiversity and green infrastructure	Conserve and enhance biodiversity and green infrastructure at all scales noting in particular the strategic importance of the river corridors, green spaces and other local assets that contribute to the All London Green Grid.
Climate change adaptation	Avoid development in areas of flood risk, reduce existing flood risk where possible and implement wider measures to ensure that communities are made more resilient and able to adapt to the impacts of climate change.
Climate change mitigation	Minimise per capita emissions of greenhouse gasses, including by supporting energy efficient buildings and generation of heat/power from low carbon sources (notably district heating / heat networks)

Communities	Accessibility	Deliver new and upgraded community facilities to meet the needs of a growing population and address capacity issues.
	Housing	Make provision for housing needs as far as possible, including in respect of genuinely affordable housing, and ensure high quality living environments.
	Wider issues	Support strong communities, equality of opportunity and good health; and address existing areas of deprivation, exclusion, poor health and crime.
Economy		Support an inclusive economy by steering investment to town centres and other employment hubs and supporting the growth of priority sectors including the cultural, creative and digital industries.
Historic environment, heritage, character and culture		Conserve and enhance the historic environment; retain and reinforce the distinctive character and identity of Lewisham's neighbourhoods and townscapes and support Lewisham's thriving and evolving cultural identity.
Land and natural resources		Make best use of land through directing new development to brownfield land and sites, supporting higher density development where appropriate; minimise waste by supporting a circular economy; and address contaminated land.
Transport		Ensure an effective and efficient transport network by minimising the need to travel and supporting modal shift towards walking, cycling and public transport, including by supporting major infrastructure upgrades.

## Plan-making / SA up to this point

An important element of the required IIA process involves assessing 'reasonable alternatives' in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the main report explains work undertaken to develop and appraise a 'reasonable' range of alternative approaches to the allocation of land for development, or **growth scenarios**.

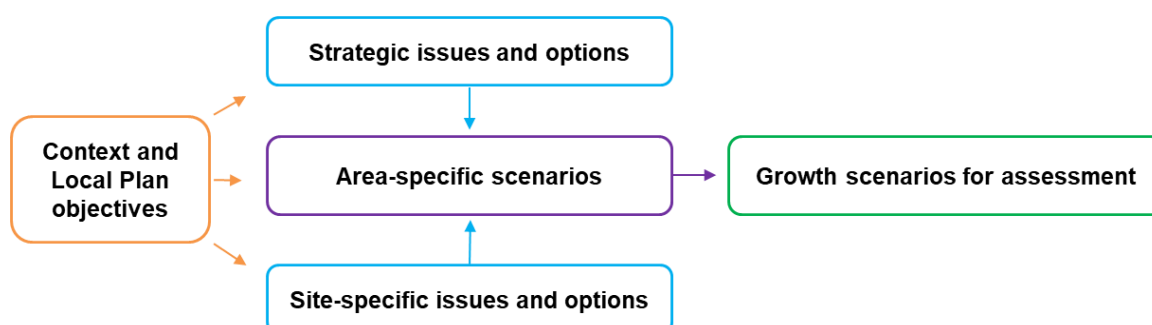
Specifically, Part 1 of the report –

- 1) Explains the process of **establishing** the growth scenarios
- 2) Presents the outcomes of **appraising** the growth scenarios
- 3) Explains reasons for **establishing** the preferred option, in light of the assessment

### Establishing growth scenarios

Growth scenarios were established following a step-wise process, which is summarised in Figure A.

*Figure A: Establishing growth scenarios*



The first step was to consider strategic issues/options ('top down' factors) in respect of:

- Housing quantum – there is a need to provide for the London Plan target and also plan mindful of the Local Housing Need (LHN) figure, which is significantly higher, and very high affordable housing needs (recognising that affordable housing is delivered as a proportion of market housing).
- Broad distribution – there are a range of strategic considerations, including in respect of: opportunity areas; regeneration areas; town and district centres; transport corridors; delivering strategic infrastructure; density / building heights; changing employment needs; respecting / enhancing local character and the local environment; and climate change.

The second step was then to give 'bottom-up' consideration to: A) site options available and hence in contention for allocation; B) the approach to assigning an indicative use mix to each allocation; and C) the approach to assigning an indicative density to each allocation. The conclusion was that (C) stands-out as associated with a strategic choice to explore further as a 'variable' across the growth scenarios.

The penultimate step involved exploring area-specific scenarios – see Table B. Importantly, the table serves to highlight that the Bakerloo Line Extension (BLE) is a prerequisite for achieving an uplift in housing at all locations other than Catford.

*Table B: Summary of area-specific growth scenarios*

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

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

- in terms of a **baseline scenario**, involving indicative densities assigned to allocations as per the methodology set out within the Council's Site Allocations Background Paper (assuming no BLE) plus five higher growth scenarios defined in terms **percentage uplifts** on the baseline - see Table C, Table D and subsequent maps; or
- in terms of the **total number of homes** delivered – see Table E.

<sup>1</sup> Baseline describes a scenario whereby the Local Plan is adopted with a 'baseline' approach to assigning indicative densities to site allocations, as per Table 5.3 (assuming no BLE).

*Table C The reasonable growth scenarios (summary)*

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

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

		Approximate percentage uplift over-and above the baseline*					
BLE assumption		No BLE		Phase 1		Phase 2	
Scenario		1	2	3	4	5	6
Allocations	New Cross	-	-	10%	10%	10%	10%
	Lewisham	-	-	10%	10%	10%	10%
	A21 corridor	-	-	-	-	10%	10%
	Catford	-	20%	-	20%	20%	20%
	Bell Green / Lower Sydenham	-	-	-	-	100%	200%
	Elsewhere in the Borough	-	-	-	-	-	-
Windfall		-	-	-	-	-	-
Total housing uplift		-	Increasing housing uplift →				

\* Baseline describes a scenario involving a 'baseline' approach to assigning indicative densities to site allocations, as per the methodology set out within the Council's Site Allocations Background Paper (assuming no BLE).

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

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

## A note on BLE assumptions

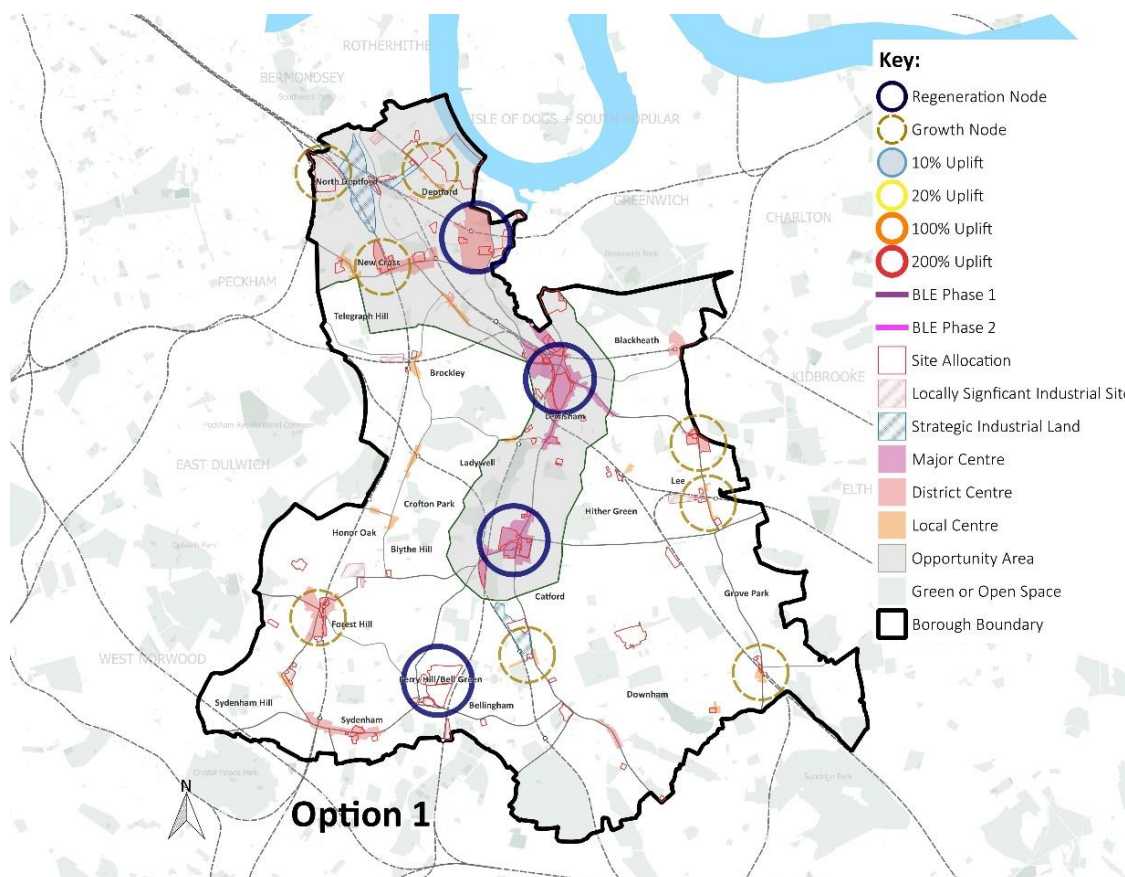
A key ‘driver’ of work to establish reasonable growth scenarios was recognition that the Council is continuing to work with the Mayor of London, Transport for London, adjoining local authorities and other key stakeholders to assess the potential impacts of BLE of supporting growth. The GLA commented through the Draft Plan consultation (2020): “... there is concern about the lack of a clear and consistent differentiation between the upfront Preferred Approach in the draft Plan, which does ‘align’ with a scenario without the BLE being delivered, and scenarios supporting the BLE in other parts of the draft Plan and its evidence.”

In turn, a key defining feature of the growth scenarios is the BLE assumption assigned to each. “No BLE” is the baseline assumption, but there is also a need to explore scenarios involving BLE Phase 1, which would extend to Lewisham, and BLE Phase 2, which would extend to Hayes via Lower Sydenham via potential stations at Ladywell and Catford Bridge. It is recognised that the three BLE scenarios mean that the six scenarios are not all directly comparable, i.e. the six might alternatively be considered three sets of two.

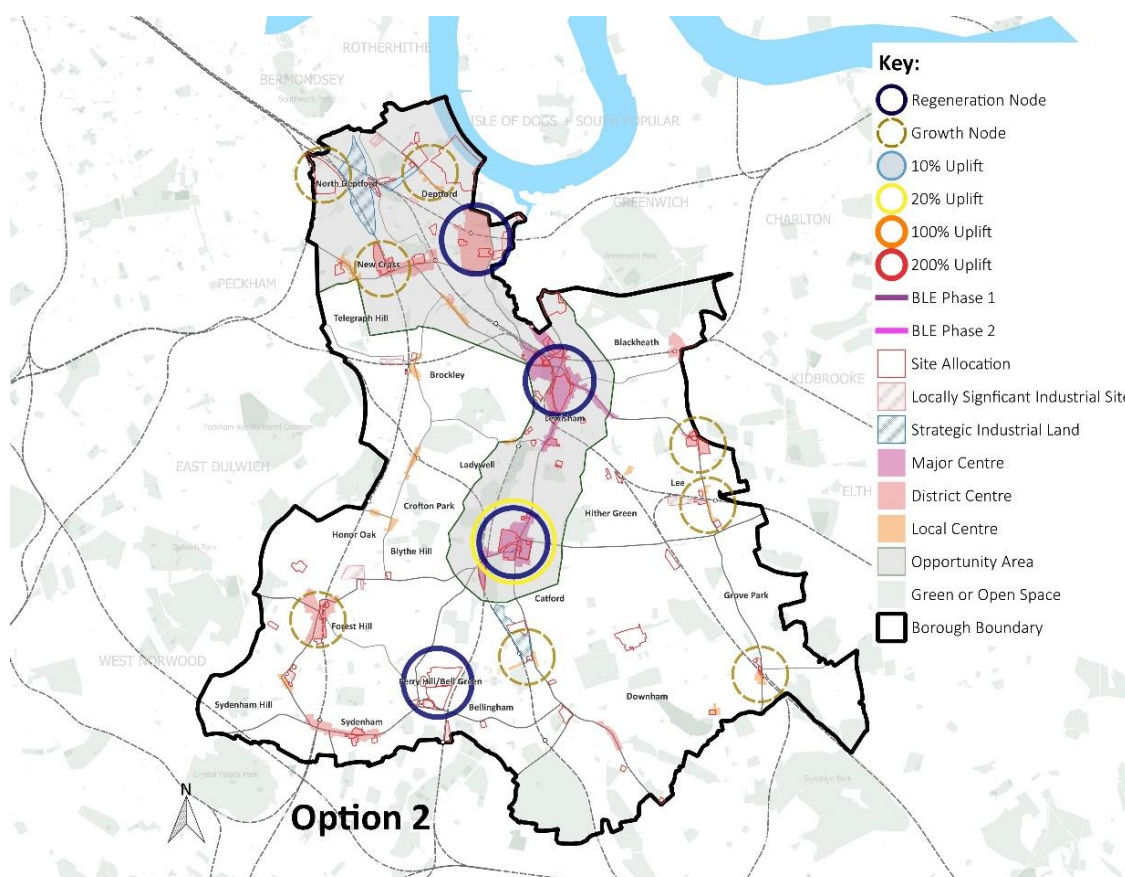
<sup>2</sup> Calculated as 133 homes for the year 2020/21 (i.e. the most recent monitoring year) plus 390 homes for the three subsequent years and then 379 homes for the remaining 16 years of the plan period.



### Scenario 1: No BLE; baseline approach to densities

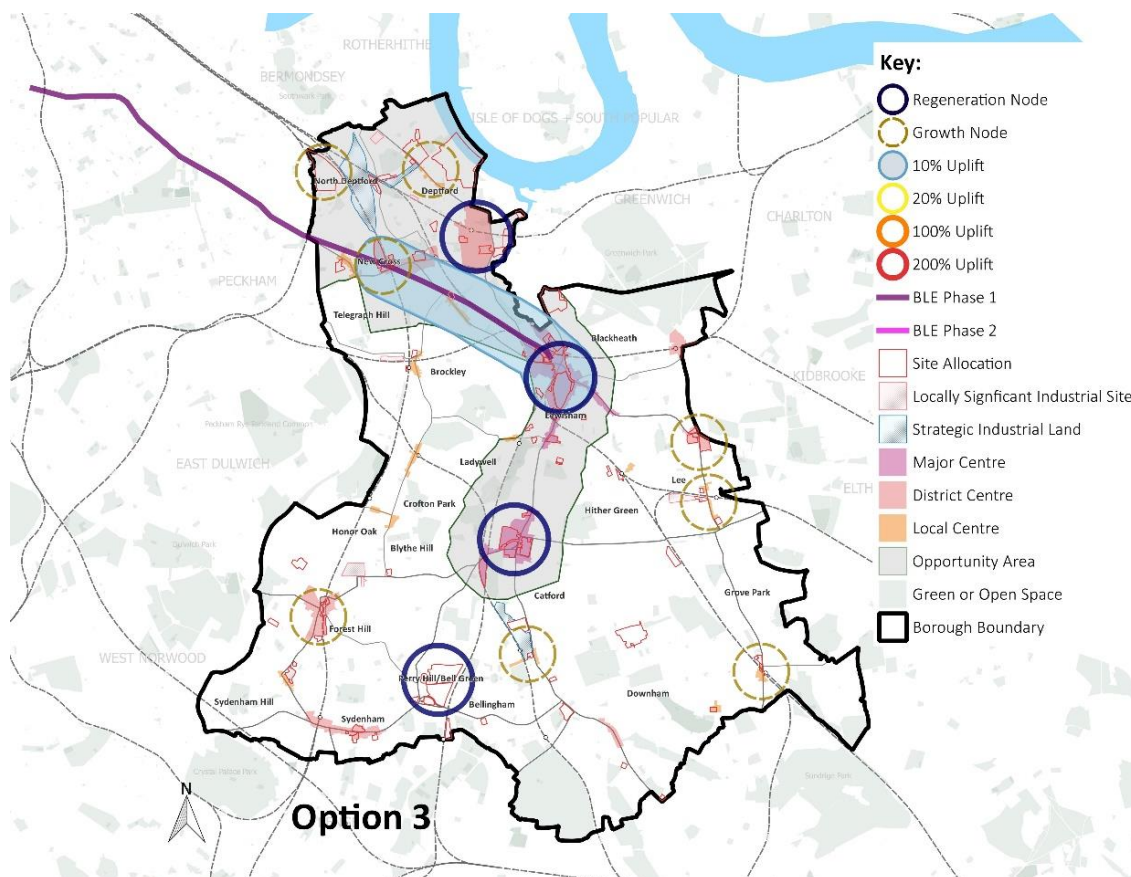


### Scenario 2: No BLE; uplift at Catford (20%)

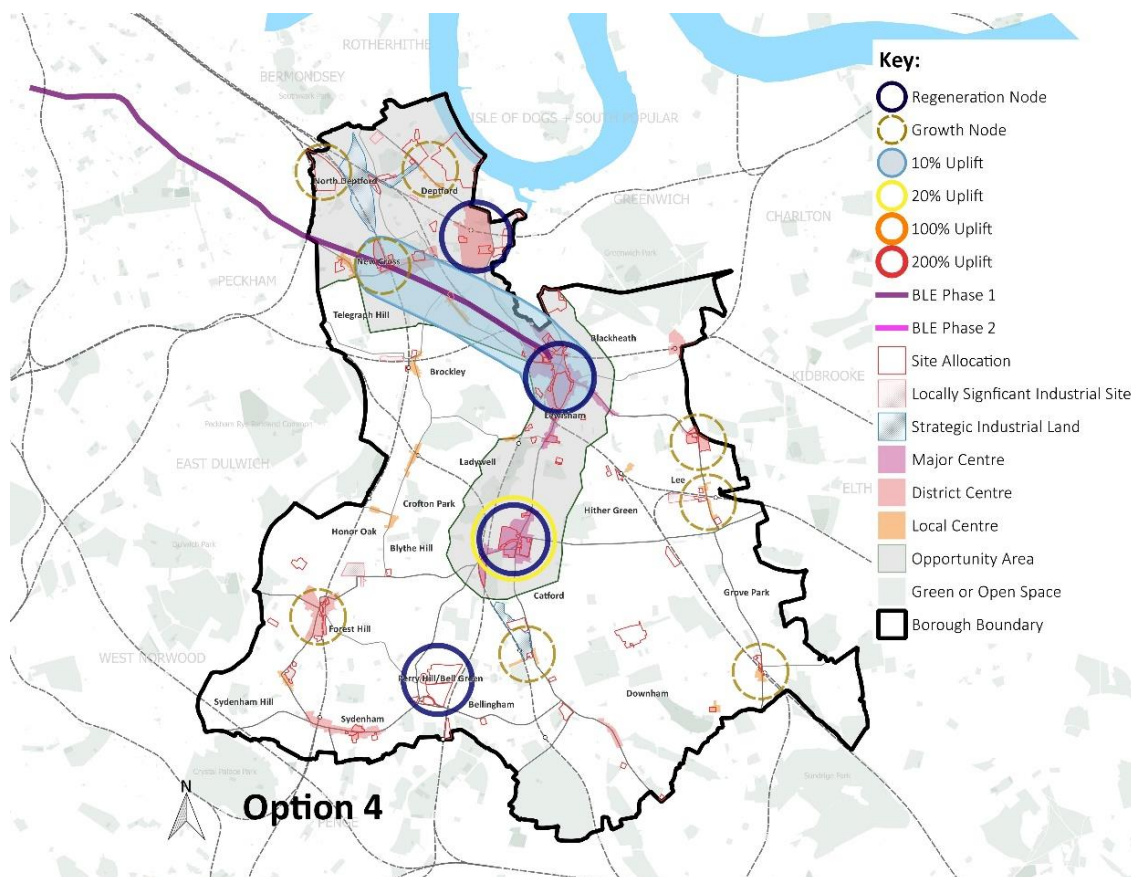




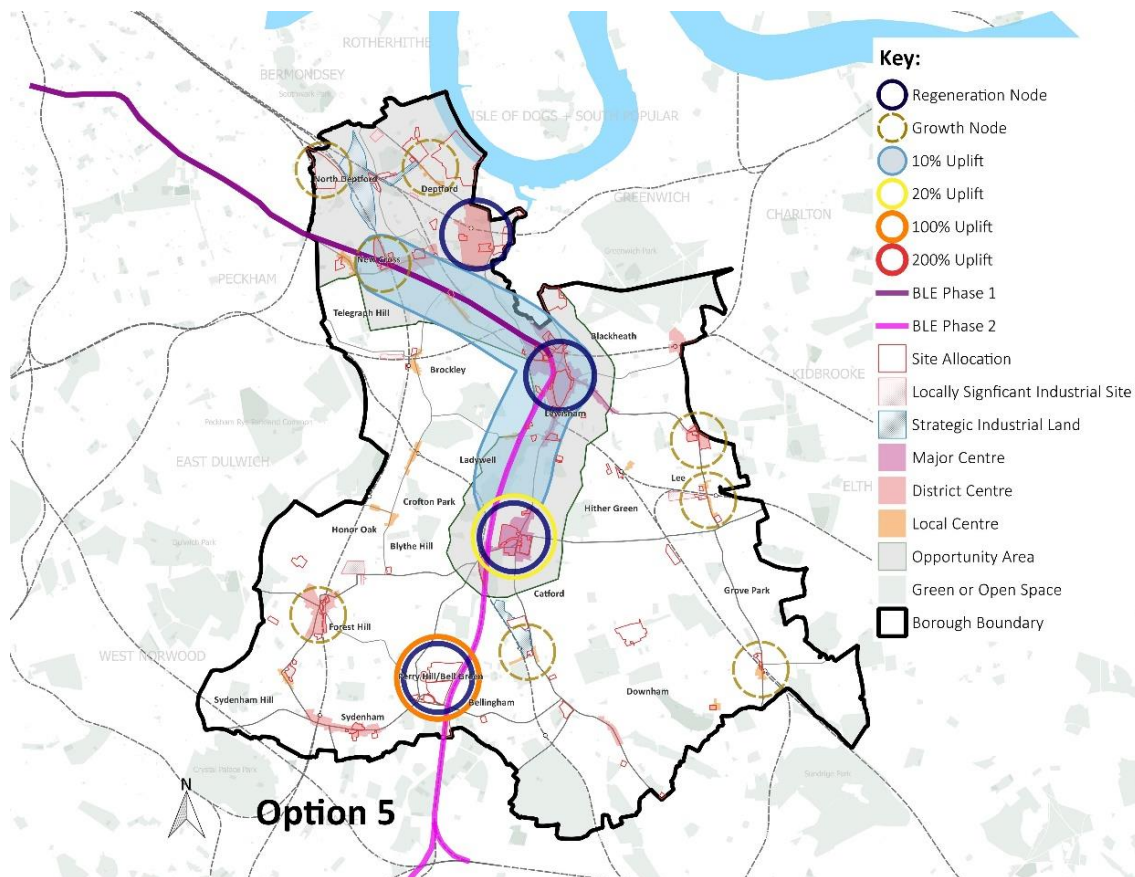
### Scenario 3: BLE P1; uplift at New Cross and Lewisham (10%)



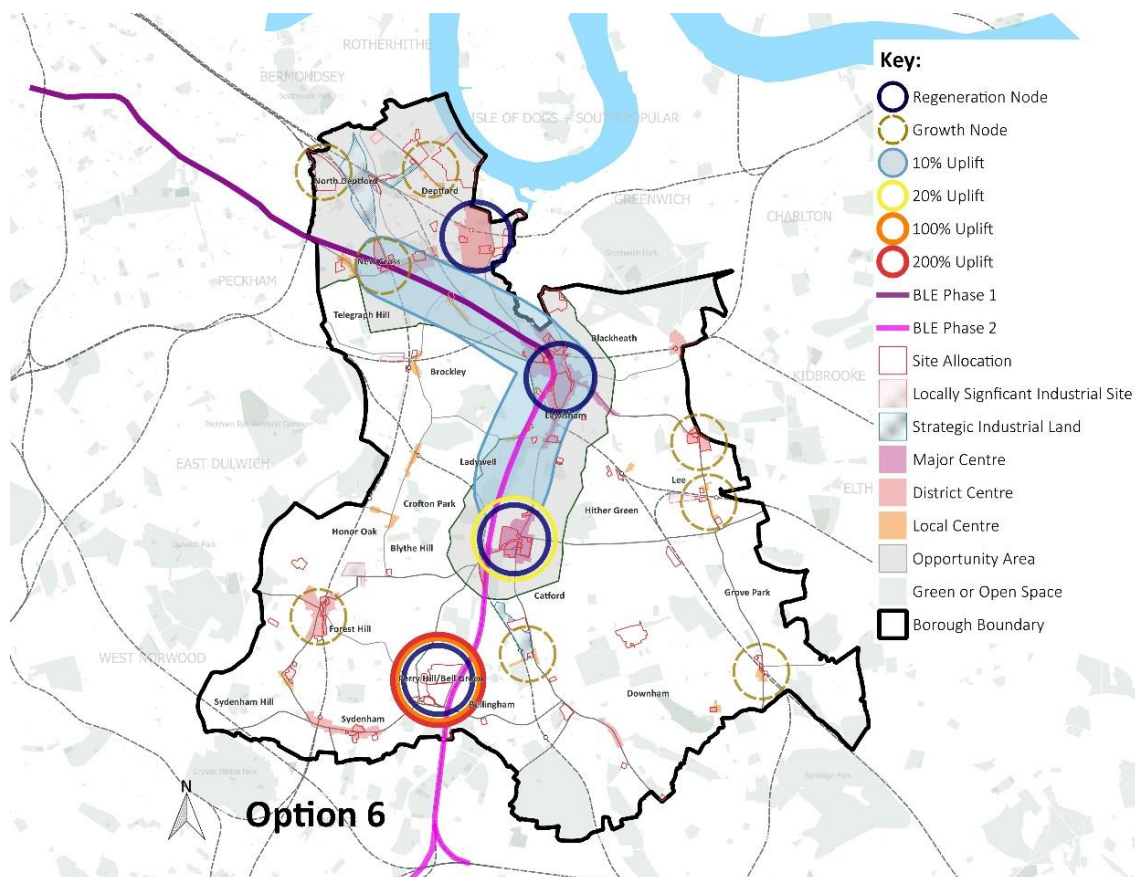
### Scenario 4: BLE P1; uplift at New Cross and Lewisham (10%) and Catford (20%)



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



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



## Assessing growth scenarios

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

*Table F: Growth scenarios assessment (rank and effect categorisation)*

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



## Discussion

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

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

### Air quality and other pollution

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

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

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

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

### Biodiversity and green infrastructure

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

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

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

### Climate change adaptation

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

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

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

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

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

### Climate change mitigation

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

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

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

### Communities 3 (Accessibility)

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

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

With regards to **Catford**, which is associated with a notable concentration of multiple deprivation, the proposal under Scenarios 1 and 3 is to assign indicative residential densities to the four sites within the Catford Town Centre Masterplan area that accord with existing levels of public transport accessibility, on the basis that this will be supportive of wide ranging regeneration objectives. There could potentially be benefits associated with a higher growth strategy; for example (and in particular), a higher density scheme at Catford Shopping Centre and Milford Towers could help to ensure that net losses of main town centre uses (currently 13,699 m<sup>2</sup>) are minimised (recalling that the proposal is to re-provide main town centre uses within this location such that these uses comprise 33% of the total floorspace of the redevelopment scheme – see paragraph 5.3.17, above). However, benefits of a higher growth strategy for Catford are uncertain, as there is a need to consider the town centre's particular character and role, with its focus on civic and cultural functions, and its relationship with nearby Lewisham. The BLE LEIA (2020) discusses wide ranging opportunities that would result from a BLE station (also noting that realignment of the South Circular can be assumed, as it has Government funding), but it is difficult to conclude that benefits would be realised more fully or enhanced under a higher growth scenario.

There are also opportunities associated with the **A21 corridor**, where the aim is to transform the main road corridor and its environs into a series of liveable and healthy neighbourhoods. Particular opportunities include delivery of cycling Quietways and better linking neighbourhoods to large open spaces. However, it is difficult to suggest opportunities associated with a slightly higher growth strategy (Scenarios 5 and 6). In **Lewisham** a key site is Lewisham Shopping Centre, where the proposal is for a high density scheme (450 dph, reflecting high PTAL) that will ensure a net gain in main town centre uses (currently nearly 45,000 m<sup>2</sup>), and there could be benefits to a modestly higher density scheme still (10% uplift) to secure a further net gain in town centre uses.

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

### Communities 2 (Housing)

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

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

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

### Communities 3 (other issues)

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

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

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

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

Access to high quality housing, including family housing, affordable housing and specialist housing, is also key, and has been discussed above under the **'Housing'** heading, noting that the provision of sufficient high quality affordable housing is a key consideration when seeking to ensure equality of opportunity, including amongst black and minority ethnic (BAME) groups, who are more likely to experience housing deprivation, overcrowding and homelessness than White British households.<sup>3</sup> Households with children are also more likely to experience housing deprivation and this likelihood is increased for most ethnic groups. The provision of specialist housing for disabled people and the elderly is a particular challenge nationally, including due to the ageing population.

**Air and noise pollution** is another matter discussed above with wide range health and wellbeing implications. Beyond the matter of minimising car movements and resulting pollution (which is the focus of discussion above), the Health Equity in England: the Marmot Review 10 Years On (2020) report highlights the importance of addressing unhealthy highstreets, including on the basis that air and noise pollution lead to wide ranging indirect impacts (as opposed to headline direct impacts) including: impaired quality of life leading to poor mental health, physical stress, physical inactivity and behavioural and psychological effects.<sup>4</sup> Addressing the quality of the urban realm in Lewisham and (in particular) Catford, and also along the A21 corridor, is a focus of discussion above, including in respect of access to rivers and open space.



Also, and more generally, there is a focus nationally on achieving high standards of masterplanning, design and place-making; for example, a recent report (April 2022; see [resiliencebrokers.org/project/key-cities](https://resiliencebrokers.org/project/key-cities)) called for a new **health-focused** approach to town planning, specifically: *“One that moves away from having the delivery of housing numbers at its core, and replaces this with a holistic vision of health. Affordable, quality housing is still a critical issue of course, but it is one in an array of conditions necessary to support good health.”*

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

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

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

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

### Economy

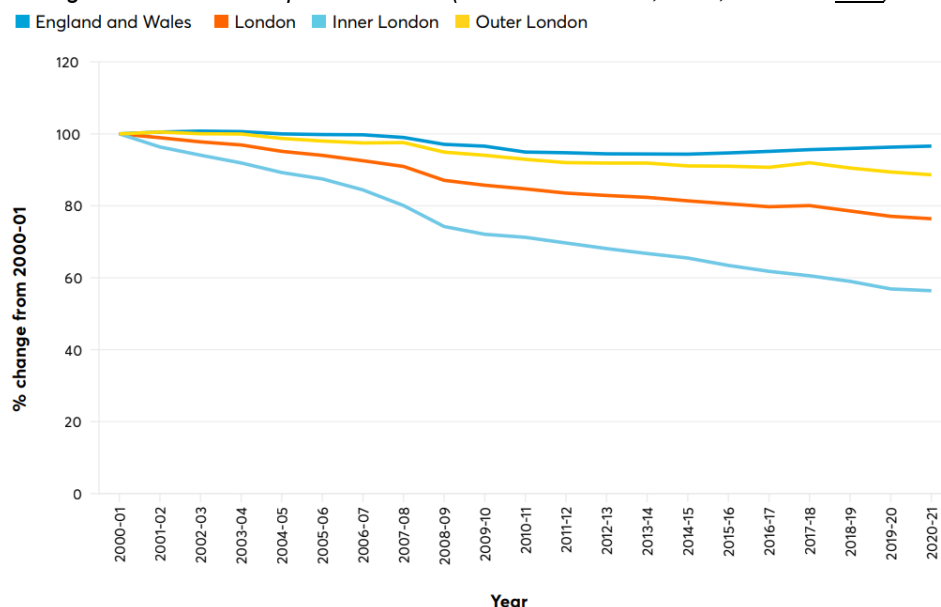
By planning to meet employment needs the Local Plan can help to address the challenges facing high streets, assist in growing key sectors and clusters, and ensure that there is a range of employment opportunities available locally, including for those with lower education and skills within the Strategic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

Focusing on the growth scenarios, one immediate consideration relates to the implications of **higher growth** strategy for employment land provision and the effective mixed use redevelopment of existing employment sites. There are several proposals to redevelop existing Locally Significant Industrial Sites (LSIS), including two proposals at BGLS, namely at Stanton Square and Worsley Bridge Road. Focusing on Worsley Bridge Road, the assumption is that employment land will comprise 60% of total floorspace after redevelopment (an increase from the 33% proposed at the Regulation 18 Draft Plan stage), which would mean that there is a net loss of employment space on site under Scenarios 1 to 4, but this loss could be mitigated under the higher growth scenarios (Scenarios 5 and 6) and there could even be a net gain in terms of total employment floorspace (because a higher density scheme will involve more homes / residential floorspace and, in turn, more employment floorspace). Maximising total employment floorspace is important, in light of the Employment Land Study (2019) target of delivering deliver circa 1,000 m<sup>2</sup> new B-class employment land per annum.<sup>5</sup> It is also important in light of local economic objectives around supporting micro and small sized businesses in target industries, particularly within the cultural, creative and digital sector, which will tend to be well suited to operating from higher density mixed use developments, for example a high density scheme at Worsley Bridge Road LSIS under a BLE P2 scenario. However, there is also a need to give consideration to more qualitative matters, namely the precise type and nature of B-class space that is provided and, in turn, question whether the types of light industrial uses currently on-site will be able to continue to operate following higher density mixed use development. This is an important consideration, given trends across London for light industrial uses to move outwards and out of London (see figure below); and there is a need to consider implications for those who rely on existing ‘industries at risk’ for employment, who might be geographically clustered and/or tend to be at risk of unemployment. Having said this, in the case of the two LSIS in the South of the Borough proposed for mixed use redevelopment (at a higher density under Scenarios 5 and 6), it is recognised that this area is associated with high industrial vacancy rates.

<sup>3</sup> See: <https://raceequalityfoundation.org.uk/wp-content/uploads/2018/02/Housing-Briefing-26.pdf>

<sup>4</sup> See <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

<sup>5</sup> Importantly, this target was set having taken into account recent and forthcoming losses of (underused and vacant) employment land as part of regeneration in the North of the Borough facilitated by the Core Strategy (2011). In particular, the committed Convoys Wharf MEL scheme will lead to a net loss of 44,500 m<sup>2</sup> B-class floorspace, whilst the committed Timber Yard, Deptford Wharves at Deptford Landings MEL (Oxestalls Road) and Scott House scheme will lead to a net loss of 10,787 m<sup>2</sup>.

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

Source: VOA (2021). Non-Domestic Rates. Table FS4.1: Industrial sector - total floorspace by administrative area. data to 31 March 2021.<sup>24</sup>

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

Laurence House and Civic Centre is a key proposed town centre allocation, in that it currently supports 18,700 m<sup>2</sup> employment floorspace. The rationalisation of older office stock may result in net loss of employment floorspace with redevelopment; however, this could be minimised / offset via a higher density scheme, which might also be supportive of wider objectives to deliver a new dedicated ‘employment quarter’ within Catford town centre providing a wide mix of business units. In a similar fashion, higher densities in the New Cross area (10% uplift under Scenarios 3 to 6) are supported as the effect would be to deliver additional employment land and workspace in the north of the Borough, which will help to meet identified needs, and compensate for a large net decrease in employment land over the plan period due to losses incurred through already consented schemes.

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

### **Historic environment, heritage, character and culture**

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

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

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

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

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

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

### Land and natural resources

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

### Transport

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

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

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

## The preferred growth scenario

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

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

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

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

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

## Assessment of the Local Plan

Part 2 of the IIA Report presents an assessment of the Local Plan as a whole, which in practice means taking account of the preferred spatial strategy (which, as discussed, reflects Scenario 1 assessed above) alongside the suite of proposed development management (DM) policies.

The assessment is presented as a series of narratives under the eleven 'SA framework' topic headings, before reaching an overall conclusion. The overall conclusion is presented below.

### A note on committed elements of the Local Plan

One important point to note regarding the Local Plan is that a significant proportion of the proposed allocations are already committed, in that they either already have planning consent or are associated with an advance planning application, such that planning consent is anticipated ahead of adoption of the Local Plan. There is limited potential for the Local Plan to influence such sites, and hence these sites are not a focus of the assessment. This includes a concentration of sites in the north sub-area.

## Conclusion on the Local Plan as a whole

The assessment predicts positive effects in respect of the majority of objectives, with **‘significant’ positive effects** predicted in respect of Accessibility. This ‘significant’ positive effect is predicted primarily on the basis that the proposed spatial strategy focuses growth on the most accessible areas and those less accessible areas where there is the potential for growth to support / unlock new strategic community and transport infrastructure (also employment), namely within the south of the Borough, including within the Strategic Area of Regeneration. This characteristic of the proposed spatial strategy also enables a conclusion of ‘moderate’ positive effects in respect of Air quality and Transport.

Another key ‘accessibility’ consideration is in respect of the use mix supported at specific sites and, in this respect, it is important to note that a range of changes have been made since the Draft Plan stage. However, at some sites the proposed use mix is unchanged, e.g. Lewisham Shopping Centre, which is comfortably the largest uncommitted site (e.g. set to deliver over 60,000 m<sup>2</sup> of town centre uses, with the next most significant delivery at Convoys Wharf MEL, at 50,400m<sup>2</sup>), albeit the site is at the ‘pre application’ stage. Delivering town centre and employment uses at this key site, in addition to residential, is important from a perspective of supporting the aspiration for Lewisham to attain London Metropolitan Centre status.

The other topics for which **‘moderate or uncertain’ positive effects** are predicted are: Biodiversity and green infrastructure (although certain tensions are highlighted, noting the focus of growth along the sensitive river corridors, including the A21 corridor); Climate change mitigation (although there is a need for further work to ensure that the spatial strategy makes the most of locational opportunities, particularly in respect of heat networks); Housing (because the approach to site selection, densities, use mix and small sites will enable all key targets to be met, including the London Plan ten year target, plus there is support for significantly higher densities at Bell Green and Lower Sydenham under a BLE Phase 2 scenario); Wider communities issues’ (although there are certain tensions, and a need for further work to ensure that existing communities and businesses share in the benefits of growth, particularly in the Strategic Area of Regeneration in the south of the Borough, and particularly that part distant from the A21 corridor); and Historic environment and townscape (with the assessment serving to demonstrate that understanding of constraints and opportunities has fed-in to the calculation of indicative densities, and site specific policies having been notably supplemented since the Draft Plan stage in light of consultation responses).

In terms of the Economy, the conclusion is **‘uncertain’ effects**, which is a departure from the Draft Plan stage. There is a clear strategy aimed at supporting growth in target sectors; however, there are certain tensions, particularly around mixed use redevelopment of existing industrial sites, with ten LSIS (including three currently designated as SIL, where the proposal is to change the designation to LSIS) proposed for mixed use redevelopment, and densities at several having been increased since the Draft Plan stage.

The only conclusion of overall **‘moderate or uncertain’ negative effects** is reached in respect of Climate change adaptation on the basis that a significant number of proposed allocations intersect the flood risk zone. This results from the proposal to focus growth along strategic transport corridors that follow river valleys, and the proposal to intensify uses at numerous sites that have historically been used for uses that are less vulnerable to flooding, in particular industrial and retail uses. The proposed strategy is reflective of an understanding that there are steps that can be taken to satisfactorily mitigate flood risk, including through: drainage systems, urban greening (linking with wider climate change adaptation objectives, around minimising the urban heat island effect and ensuring shading for buildings and public spaces); avoiding vulnerable uses on the ground floor, flood resistant design (e.g. to prevent water from entering the building and damaging its fabric) and flood resilient design (e.g. to ensure the building’s structural integrity is maintained and that drying and cleaning can be facilitated). The proposed strategy and site-specific policy will warrant further scrutiny as part of plan finalisation, mindful of the risk of in-combination impacts. Planning Practice Guidance on flood risk has been notably updated recently (August 2022) including in respect of downstream in combination impacts, for example stating: “Whilst the use of stilts and voids below buildings may be an appropriate approach to mitigating flood risk to the buildings themselves, such techniques should not normally be relied upon for compensating for any loss of floodplain storage. This is because voids do not allow water to freely flow through them, trash screens get blocked, voids get silted up, they have limited capacity, and it is difficult to stop them being used for storing belongings or other materials.”



Finally, it is important to note that the assessment presented above has included a focus on changes made since the Draft Plan stage, and these changes serve to highlight the challenges in respect of plan-making and assessment, with numerous changes made following reconsideration of appropriate density / use mix, and numerous changes made to reflect recent planning consents. In turn, this serves to highlight that many of the issues and impacts associated with this plan are very 'fine grained' and, in turn, numerous. More significant are issues / impacts associated with inter-related considerations in respect of density, use mix and design / development management. In turn, it is inherently challenging for this report to explore all issues and impacts in detail. Rather, the aim is to highlight issues and headline impacts / tensions, with a view to supporting ongoing scrutiny and discussion. For example, a key issue for the local plan is in respect of tall buildings policy to inform planning applications for schemes other than those envisaged through the package of site allocations, but it is difficult to draw conclusions regarding 'on the ground' impact.

The Council should take these assessment findings into account as part of plan finalisation, as efforts are made to balance competing objectives, for example, on the one hand, socio-economic objectives relating to meeting (and exceeding) the London Plan housing target and meeting employment growth/diversification and town/district centre regeneration objectives, and, on the other hand, minimising tensions with environmental objectives. Whilst there can be 'win-win' opportunities, including in respect of climate change mitigation (heat networks), biodiversity / green infrastructure (e.g. river deculverting) and, in some cases, heritage, there are other environmental objectives for which growth leads to an inherent tension, perhaps most notably flood risk. It will also be important to recall that there can be tensions between competing socio-economic objectives, including objectives relating to changing / 'balancing' local economies on the one hand, whilst meeting the needs of existing communities, including more vulnerable communities and groups within the population, on the other hand. However, tensions of this nature can often be resolved through careful plan-making, e.g. stringent DM policy and masterplans for key areas of change. In respect of DM policy, it will be important to ensure that the stringency of policy aligns with the inherent locational constraints at proposed allocations (e.g. flood risk), and that DM policy feeds into final decisions on indicative densities. In respect of masterplans, the Council has undertaken a range of good work, including for Catford and the A21 corridor, and there will be merit to keeping work up to date, mindful of the national context including in respect of post Covid and cost of living.

## Next Steps

### Submission and examination

The IIA Report, along with this Non-technical Summary, is currently published alongside the Proposed Submission Plan, as required by legislation.

Once the period for representations on the Proposed Submission Plan / IIA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether in light of representations received the plan can still be deemed 'sound'. If this is the case, the Local Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the IIA Report.

At Examination the Inspector will consider representations before then either reporting back on the Plan's soundness or identifying the need for modifications. If the Inspector identifies the need for modifications these will be prepared and then subjected to consultation, potentially alongside IIA.

## Monitoring

At the current time, in light of the assessment findings presented above in respect of the Draft Local plan, it is suggested that monitoring might focus on:

- Loss of light industrial land, potentially with a focus on the needs of specific types of business;
- Development in a flood risk zone, and also potentially adjacent to the flood risk zone given uncertainty regarding future flood risk given climate change; and
- Impacts to existing communities / groups within the population as a result of town and district centre regeneration and the redevelopment of existing industrial and mixed use employment sites.