

10 GREEN INFRASTRUCTURE

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GR1 Green infrastructure and Lewisham's Green Grid

- A Lewisham's network of green and open spaces, waterways and green features are a fundamental component of the natural environment. This network makes an important contribution to the Borough's local distinctiveness including its character and heritage. It is also integral to supporting sustainable neighbourhoods and communities by providing a wide range of multifunctional environmental, social and economic benefits. Development proposals must protect and seek to enhance provision of green infrastructure across the Borough, including by improving or creating new links between its different elements.

- B Development proposals must investigate and maximise opportunities to enhance existing green infrastructure and create new provision on site, with reference to the All London Green Grid. Consideration should be given to the site context including its setting within the wider landscape. Development proposals must make suitable arrangements for the long-term management of green areas and planting. This includes provision of sufficient space where large canopy trees can be retained and new trees established without pressure for their future removal.

Explanation

- 10.1 Green infrastructure refers to the Borough's network of green and open spaces, waterways, street trees, green roofs, public and private residential gardens, allotments and other assets, such as semi-natural and natural drainage features. It includes parks and public spaces as well as private gardens and other spaces with vegetation. Together these elements of the environment help to support strategic objectives across a number of policy areas such as: promoting public health and wellbeing, mitigating against and adapting to the impacts of climate change (including by reducing flood risk), improving air and water quality, and conserving natural habitats and species. A strategic approach to green infrastructure is necessary to ensure that green assets are protected, planned for, designed and managed in an integrated way. In London's urbanised context it is important that the multifunctional benefits of green infrastructure are recognised and proactively addressed. Green infrastructure must not be considered in isolation of other aspects of the built environment.
- 10.2 Whilst the environmental value of green infrastructure is clearly evident its social and economic value is becoming increasingly recognised. Lewisham's Open Spaces Assessment (2020) includes information on the natural capital account, which considers the economic, social and environmental value of green infrastructure. Research indicates that Lewisham currently enjoys benefits accruing from green infrastructure to a value of up to £2.1 billion, a figure that is comparable to the adjacent inner-London Boroughs. This helps to put into perspective the wider benefits of the local network of green infrastructure.
- 10.3 The protection and enhancement of green infrastructure in Lewisham is necessary to support the London Plan objective to make London at least 50 per cent green by 2050 and to support its National Park City status. Many of the Borough's trees are located in private gardens especially at the ends of rear gardens where combined garden areas provide the space for large canopy trees to develop and mature. These trees contribute to the Borough's urban forest and provide benefits including rear outlook amenity, wildlife habitat, air pollution reduction, improved ground drainage, climate change mitigation and health and wellbeing benefits.

⁹⁸ The Corporate Natural Capital Accounting (CNCA) is a methodology used to assess the social, economic and environmental value of green infrastructure, and was developed by the Natural Capital Committee in its report to the UK Government. It considers factors such as the costs of public inactivity, the value of recreational visits to green infrastructure, impact of green infrastructure on property values, and the value of the various environmental functions green infrastructure performs. See Lewisham's Open Space Assessment (2020) for further details.

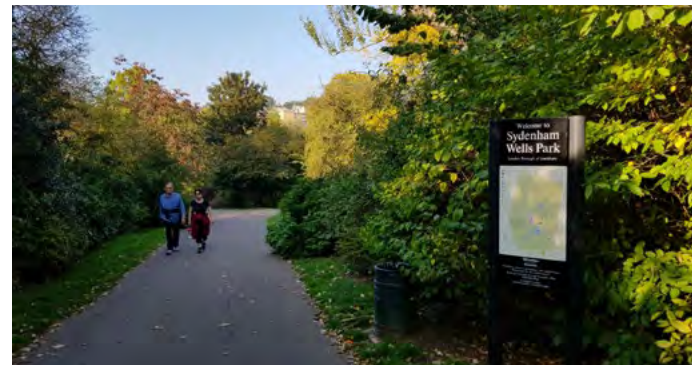
Development proposals should retain these trees for their ecosystem services and avoid compromising and encroaching available space for them. This includes, for example, smaller developments involving building extensions, garden studios, the subdividing of houses and gardens as well as larger redevelopment schemes.

- 10.4 The London Mayor has prepared supplementary planning guidance on the All London Green Grid (ALGG)⁹⁹. The ALGG promotes the creation of a high quality and multifunctional green infrastructure network across London with the principal aim of supporting sustainable communities. The ALGG includes different types of open spaces, green corridors and the linkages between these (including wider public realm, corridors along transport routes, footpaths and cycle ways). The ALGG defines a number of Green Grid Areas across the region and Lewisham sits within the ‘South East London Green Chain Plus’ area. The Local Plan helps give effect to the ALGG and some of the key strategic objectives are reflected in the sub-areas section of this Plan. All development proposals will be expected to positively engage with the ALGG guidance in supporting a linked network of green infrastructure locally that improves public access to open spaces.

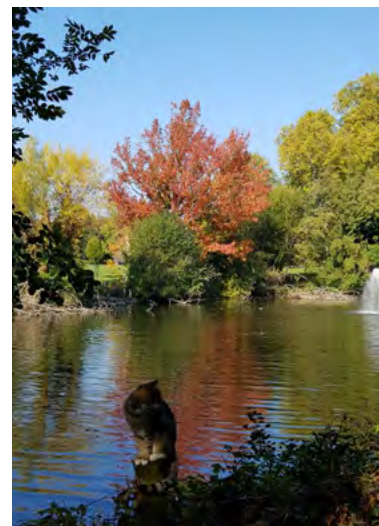
⁹⁹ Green Infrastructure and Open Environments: The All London Green Grid. Supplementary Planning Guidance. 2012. Mayor of London.



Hilly Fields



Sydenham Wells Park



Manor House Gardens

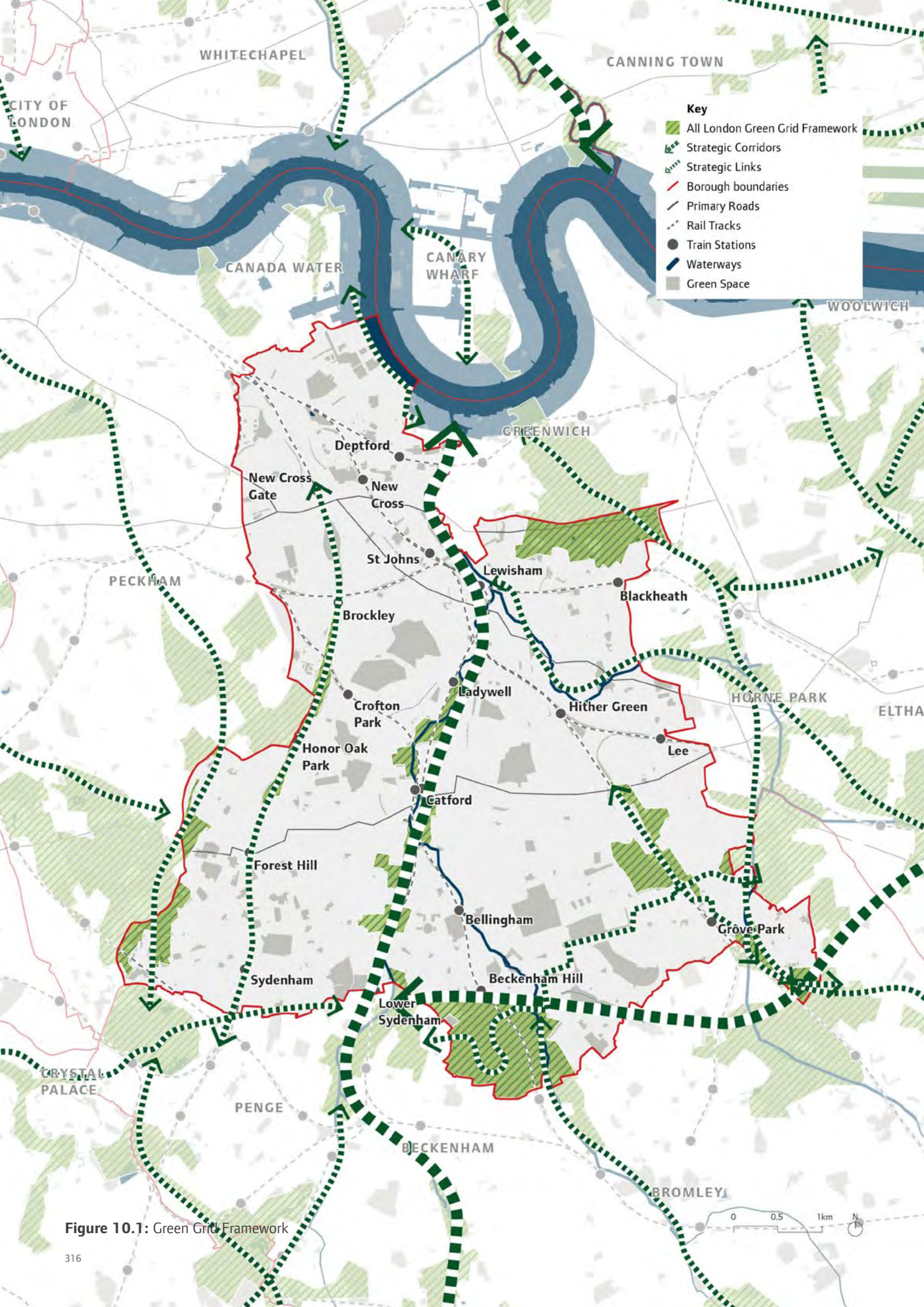


Figure 10.1: Green Grid Framework

GR2 Open space

- A Open spaces are integral components of Lewisham’s Green Grid and will be protected from inappropriate development, in accordance with Lewisham’s open space hierarchy.

Designated Open Spaces

- B Metropolitan Open Land (MOL) and Local Green Space (LGS) are afforded the same level of protection as Green Belt. Development proposals on MOL and LGS will be considered in accordance with the London Plan and national planning policies that apply to Green Belt land.
- C Development proposals involving the loss of Strategic Open Space will be strongly resisted and only permitted in the following exceptional circumstances:
- a. Replacement provision of at least an equivalent amount (i.e. no net loss) and better quality will be provided. The replacement provision must:
 - i. Be located within the Borough and in reasonable proximity to the existing open space, with equivalent or better access by walking, cycling and public transport;
 - ii. Not result in an increase in public open space deficiency;
 - iii. Be publicly accessible;
 - b. The development will provide a wider public benefit which clearly outweighs the loss of the existing open space;
 - c. There will be no adverse impact on biodiversity, with reference to Policy GR3 (Biodiversity and access to nature);

- d. Suitable replacement provision will be made for outdoor sports facilities or playing fields, with reference to London Plan policy S5 (Sports and recreation facilities), as well as allotments and community gardens where appropriate; and
- e. Where the development involves part of an area of open space the quality of any remaining open space will not be eroded by the development.

- D Where development proposals satisfy the requirements of GR3.C above, the full quantity of replacement open space must be secured prior to the commencement of the development. Planning conditions and/or legal agreements will be used to ensure the open space is appropriately secured.

- E Neighbourhood forums are encouraged to undertake detailed assessments to identify appropriate sites to designate as Local Green Space in neighbourhood development plans.

Neighbourhood Open Space

- F Development proposals involving the reconfiguration of Neighbourhood Open Space will only be supported where:
- a. There is no net loss of open space, including play space, and net gains are achieved wherever possible;
 - b. There is no detrimental impact on the environmental function of the open space, including support for nature conservation;

- c. There will be demonstrable improvements in the quality of open space and public access to it;
- d. The reconfiguration is delivered through comprehensive development, in line with a site wide masterplan, and will ensure a viable future for the open space.

- G Development proposals resulting in the net loss of Neighbourhood Open Space will be only be permitted where it is demonstrated that:
- a. The development will provide a wider public benefit which clearly outweighs the loss of the open space;
 - b. The development cannot feasibly be delivered without the loss of part or all of the open space;
 - c. A design options appraisal has been used to ensure the minimal amount of open space will be lost and that any remaining open space is of a higher quality, with greater multifunctional use (for example play space, habitat creation or climate change adaptation measures);
 - d. There will be improvements to the quality of the remaining open space; and
 - e. Appropriate provision is made for existing play space and market space with reference to CI 3 (Play and informal recreation) and EC 20 (Markets).

Ancillary uses

- H Development proposals for ancillary uses on open space that help to improve the quality of open space and promote access to a wide range of users will be supported where they:
- a. Are demonstrably ancillary to the use of land as open space;
 - b. Are necessary to facilitate or support the appropriate use of the open space;
 - c. Do not have a detrimental impact on the environmental function of the open space, including support for nature conservation;
 - d. Respond positively to local character, including by maintaining or enhancing the visual quality of the open space and its setting;
 - e. Are of a scale and function that is proportionate to the nature of the open space; and
 - f. Are of a high quality design, including by following inclusive and safe design principles, and do not detract from the amenity provided by the open space.

Enhancing the quality and function of open spaces

- I Development proposals, should maximise opportunities to introduce new publicly accessible open space, giving priority to green space, as well as improve connections to existing or planned new open spaces, particularly in areas of open space deficiency. Major developments must incorporate new publicly accessible open space unless it can be clearly demonstrated that this is not feasible, in which case off-site contributions may be required.

- J With reference to Policy GR4 (Lewisham Links) development must maintain and wherever possible enhance access to and connections between the network of open spaces within and outside the Borough. Priority should be given to measures that encourage walking, cycling and other active travel modes along routes that link open spaces such as the South East London Green Chain, Waterlink Way, the Thames Path and other local elements of the All London Green Grid.

- K Development proposals located adjacent to open space must respond positively to the character of the open space as well as protect, and wherever possible enhance, the biodiversity value and visual amenity provided by it.

Table 10.1: Lewisham’s open space hierarchy

CATEGORISATION	DESCRIPTION	PRIMARY FUNCTION
Metropolitan Open Land and Local Green Space	MOL and LGS are the highest order of open space in the Borough. As set out in the NPPF, they are afforded the same level of protection as Green Belt. MOL is designated on the Policies Map. LGS is designated in Neighbourhood Plans.	<p>MOL are extensive areas of land bounded by urban development around London that fulfils a similar function to Green Belt.</p> <p>LGS are green spaces which are demonstrably special to a local community and hold a particular local significance because of their beauty, historic significance, recreational value, tranquillity, or richness of wildlife and biodiversity.</p>
Strategic Open Space	Open spaces that are significant to the Borough’s open space and wider green infrastructure network. Strategic Open Spaces are designated on the Policies Map.	Green spaces including: Parks and gardens, natural and semi-natural green space, green corridors, allotments and community gardens, outdoor sports facilities and playing fields and formal amenity green space.
Neighbourhood Open Space	Open spaces that make an important contribution to the liveability of neighbourhoods. These can include but are not limited to green spaces. Neighbourhood Open Spaces are not designated on the Policies Map.	Provision for children and young people, informal amenity space and civic and market squares and hard-surfaced areas designed for pedestrians.

Explanation

10.5 Open spaces form a vital component of Lewisham’s Green Grid and London’s network of green infrastructure. Open spaces, including waterways and water spaces, make a significant contribution to the environmental quality and character of the Borough. They also play a key role in supporting the physical and mental health and wellbeing of the local population by providing opportunities for leisure and recreation as well as enabling people to lead active lifestyles. Lewisham benefits from provision of a wide range of good quality open spaces which total around one-fifth of the area of the Borough. Some open spaces contain protected habitats or species and are designated as Sites of Importance for Nature Conservation. Further details are set out in Policy GR3 (Biodiversity and access to nature).

10.6 As the Borough’s population increases the pressure on existing parks and open spaces will invariably rise. The Lewisham Open Spaces Assessment (2020) considers the amount of open space that is needed to support the projected future population over the plan period, based on a fixed quantity standard. This suggests that a significant amount of additional provision will be required to maintain the standard over the long-term. Due to the finite availability of land and requirement to accommodate new development to meet local needs, such as for housing and workspace, there will be limited opportunities to create new larger open spaces, such as Local or District level parks. It is therefore vitally important that open spaces are protected, measures are taken to improve their function and quality, and that public access to open space is enhanced. As well, that major and other developments maximise opportunities to

integrate new publicly accessible open space. The Lewisham Parks and Open Spaces Strategy will support the implementation of the Local Plan. It sets out key priorities for delivering improvements to parks and access to them.

10.7 In accordance with London Plan policy G4 (Open space), the Local Plan sets out a hierarchy of open spaces. It also includes policies to protect these spaces commensurate with their categorisation in the hierarchy (Table 7.1). An additional open space study was prepared in 2022, which provides evidence to inform appropriate land-use designations and policies to protect and sensitively manage open and green spaces within the borough. The open space categorisations broadly reflect those set out in national and regional planning policy and guidance¹⁰⁰ but they have been adapted to reflect Lewisham’s local circumstances. Metropolitan Open Land and Strategic Open Space are designated on the Policies Map whilst Local Green Space is designated in Neighbourhood Plans. These strategic open spaces and their boundaries have been informed by numerous evidence base studies¹⁰¹.

¹⁰⁰ This includes London Plan policy G4 (Open space), Table 8.1 and Planning Policy Guidance 17. It is noted that PPG17 was replaced by the NPPF and the Government’s Assessing Needs and Opportunities Companion Guide by the NPPG. However, the Companion Guide’s methodology and typologies continue to be recognised as good practice in London and England for land-use planning.

¹⁰¹ Lewisham Open Spaces Assessment (2020), Lewisham Open Space Review (2022), Lewisham Metropolitan Open Land Review (2020) and MOL Additional Sites Report (2021). Neighbourhood Plans should be referred for information on Local Green Space.



Neighbourhood Open Spaces are not designated on the Policies Map. However the Local Plan recognises the important contribution these spaces make to liveable and sustainable neighbourhoods.

- 10.8 Development proposals involving the loss of Strategic or Neighbourhood Open Space should be avoided and will only be permitted exceptional circumstances, as set out in the policy above. The reconfiguration of Neighbourhood Open Space can be an effective approach to addressing deficiencies in the quantity and quality of provision. It can also help to overcome site constraints where it would otherwise be difficult to deliver new development, (such as for housing, workspace or community facilities) or area improvements. Development proposals involving the reconfiguration of open space must provide demonstrable improvements in the functional value of open and public access to it. In order to ensure certainty over the protection of open space and beneficial outcomes for the wider community and the environment, all proposals for reconfiguration must be delivered through comprehensive redevelopment and in line with a site-wide masterplan.

- 10.9 The Lewisham Open Spaces Assessment provides an overview of existing open space provision across the Borough and in neighbouring authorities. It includes an assessment of public access to these open spaces and identifies areas where there are deficiencies in access to certain types of provision. Whilst all development proposals should investigate and maximise opportunities to enhance open space this is particularly important in areas of deficiency. We will expect all development proposals to refer to

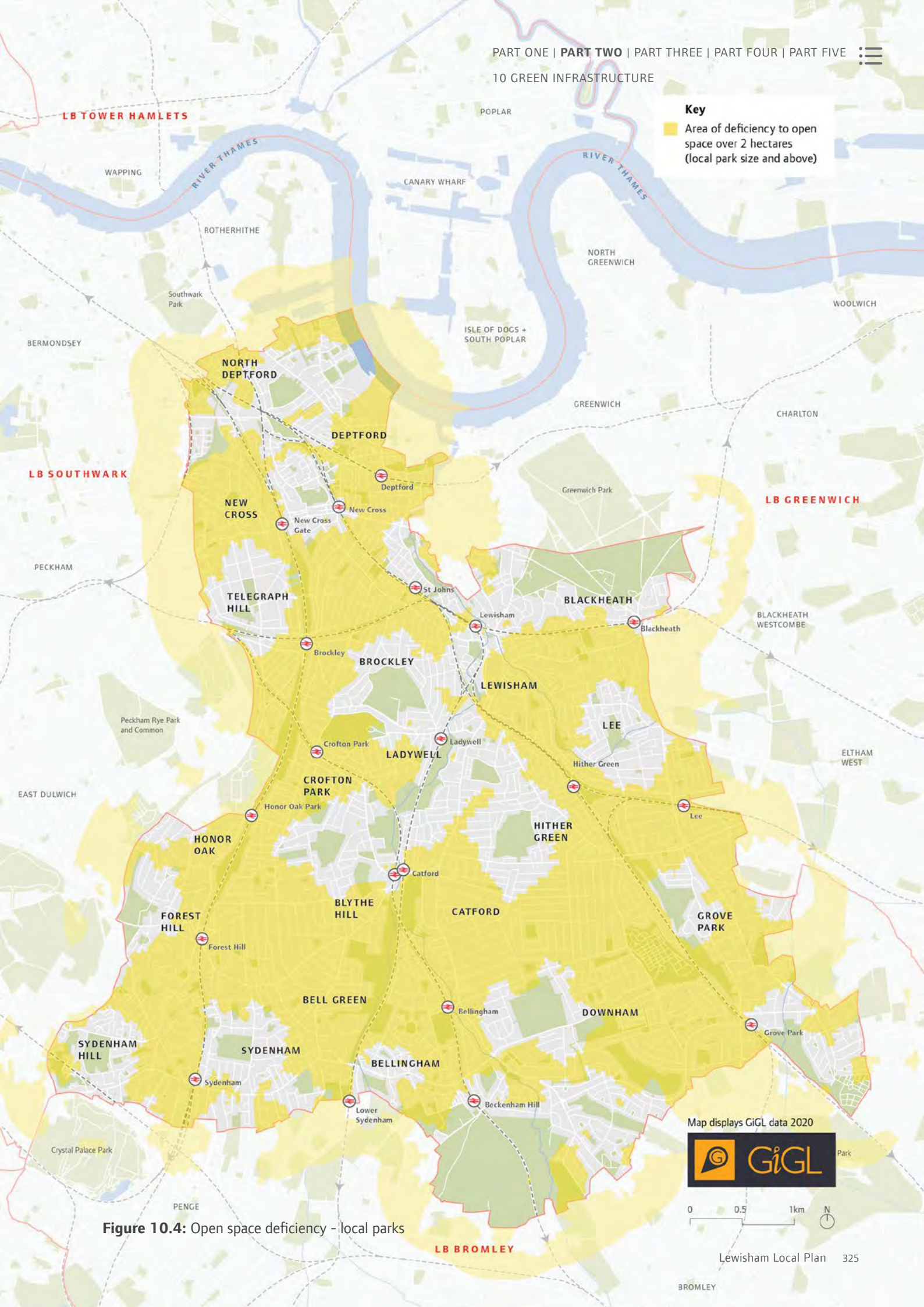
and engage with the Open Spaces Assessment, or any subsequent update, through the design-led approach. Furthermore, proposals should refer the deficiency maps developed by Greenspace Information for Greater London (GiGL). These are regularly updated taking into account the latest available information on open spaces, and use a method of accurately mapping areas of deficiency in public access based on actual walking distances along roads and paths.

- 10.10 New development can help to enhance access to open space even where it is not feasible to deliver new public open space on site. Through the design-led approach development proposals should seek to deliver public realm enhancements to create new routes or improve connections to existing or planned new open spaces, particularly in areas of deficiency. Planning contributions towards open space provision may be sought, particularly where development is likely to generate additional demands on existing provision such through the introduction of more residential units and households. Contributions may include measures that support public access to open space along with the functional quality and amenity value of it.

- 10.11 The NPPF enables neighbourhood forums to designate Local Green Space through the neighbourhood plan process. Local Green Space is afforded the same level of protection as Green Belt. Forums are well placed to identify high quality green spaces that are valued by the local community and whose protection will support the Local Plan. Forums are encouraged to undertake detailed assessments to justify the designation of Local Green Space using a robust methodology. Assessments should be published as part of the evidence base to support the plan-making and examination process.



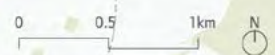
Figure 10.3: Metropolitan Open Land (MOL)



Key
Area of deficiency to open space over 2 hectares (local park size and above)

Figure 10.4: Open space deficiency - local parks

Map displays GiGL data 2020



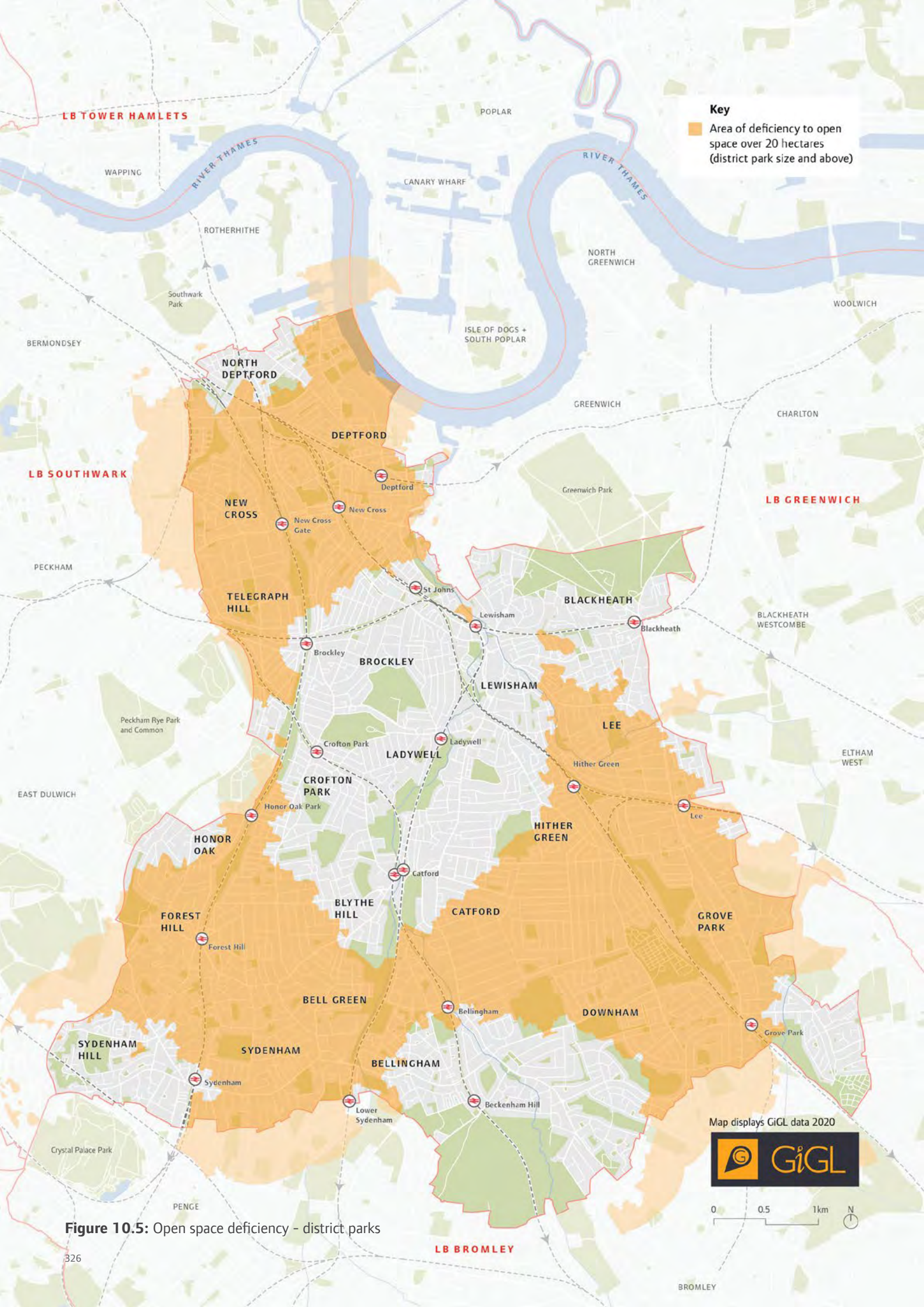
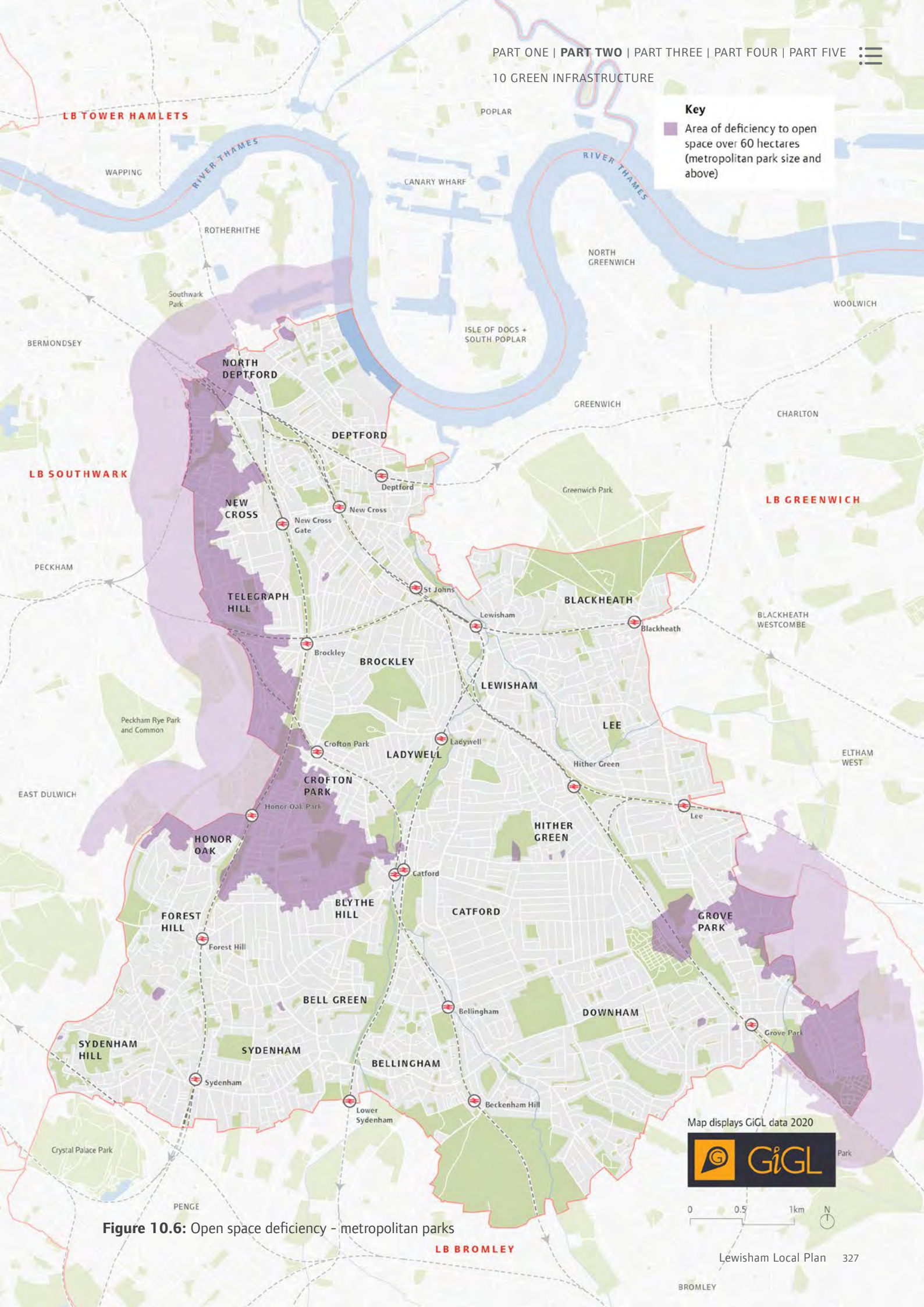


Figure 10.5: Open space deficiency - district parks

10 GREEN INFRASTRUCTURE



Key
 Area of deficiency to open space over 60 hectares (metropolitan park size and above)

Map displays GiGL data 2020



Figure 10.6: Open space deficiency - metropolitan parks



GR3 Biodiversity and access to nature

- A The Council will work positively with stakeholders, including the Lewisham Biodiversity Partnership, to promote and secure the conservation, restoration and management of habitats as well as the protection of species. It will prepare a Local Nature Recovery Strategy (LNRS) as part of a strategic approach to nature conservation and to deliver Biodiversity Net Gain within the Borough.
- B Sites of Importance for Nature Conservation (SINCs) are safeguarded in the Local Plan. Development proposals must protect and maximise opportunities to enhance the wildlife value of SINC sites. They must also protect and conserve protected and priority habitats and species that sit outside of the SINC network, with reference to the London Environment Strategy.
- C Development proposals must seek to avoid harm to biodiversity including within SINC sites and Local Nature Reserves. In line with London Plan policy G3 (Biodiversity and access to nature), where it is demonstrated that harm is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy must be applied to minimise impacts:
 - a. Avoid damaging the significant ecological features of the site;
 - b. Minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site; and
 - c. Deliver off-site compensation of better biodiversity value.
- D Development proposals that have the potential to impact on designated international or national nature conservation sites located outside of the Borough must ensure that impacts are assessed in accordance with the relevant legislative requirements. Proposals will be considered having regard to national planning policies and legislation.
- E Development proposals should seek to secure Biodiversity Net Gain. The BNG benchmark is a minimum 10 per cent increase in habitat value for wildlife compared with the pre-development baseline, calculated using an appropriate Biodiversity Metric. Biodiversity should be fully integrated into the design-led approach with consideration given to the site context and its wider landscape setting.
- F All major development proposals and other development proposals that are likely to have a direct or indirect adverse impact on a SINC, Local Nature Reserve or other site with biodiversity interests must submit an Ecological Assessment carried out by a chartered ecologist. Major development proposals adjacent to a SINC should consult the Lewisham Biodiversity Partnership to assist with the assessment of potential impacts on the site and opportunities to enhance the site’s biodiversity value.
- G Planning conditions and/or legal agreements may be used to secure Management Plans where these are considered necessary to support nature conservation objectives.
- H Development proposals that help to reduce deficiencies in the population’s access to nature will be considered favourably.

Opposite: Beckenham Place Park (photo by BDP)

Explanation

^{10.12} Lewisham features a wide variety of wildlife habitats. These including designated Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves and other areas with habitat value such as parks and open spaces, ecological corridors, waterways, woodlands and other green spaces. It is imperative that the wildlife value of these habitats is protected with appropriate maintenance regimes in place to maintain or enhance their wildlife value over the long-term. This is important not only for nature conservation but also to maximise the multifunctional benefits associated with green infrastructure. The State of Nature Report (2019)¹⁰² makes clear the issues around the decline in the abundance and distribution of species in England and the UK. The Council will continue to work with stakeholders, including the Lewisham Biodiversity Partnership, to support nature conservation and fulfil its statutory obligations. The Environment Act 2021 sets out the framework for a national Nature Recovery Network which local authorities will support through the preparation of Local Nature Recovery Strategies (LNRS).

^{10.13} Growth and regeneration can be compatible with nature conservation objectives when development is considered in a holistic way. Considerations for nature conservation must therefore be fully integrated into the design-led

approach. Development proposals must seek to avoid harm to and protect biodiversity as well as maximise opportunities to enhance the value of habitats wherever possible. Applicants should refer the latest Lewisham Biodiversity Action Plan, currently A Natural Renaissance for Lewisham (2021), which sets out information on the vision and opportunities for the Borough.

^{10.14} A review of SINCs has been undertaken to inform the preparation of the Local Plan¹⁰³. Lewisham contains Metropolitan, Borough and Local SINCS which are designated on the Policies Map. Additional ecology surveys of the Hither Green to Grove Park corridor were undertaken in 2022 to inform proposals to combine several SBINC sites to form a single Site of Importance for Nature Conservation (SINC) of Metropolitan status. The level of protection afforded to SINCS is commensurate with their status and contribution to the wider ecological network. There are also priority habitats and species outside of SINCS which are given protection through this policy. The London Environment Strategy includes a comprehensive list of priority habitats and species that require particular consideration for planning decisions. The Lewisham Biodiversity Action Plan should also be referred for information.

^{10.15} Lewisham does not contain any designated

¹⁰² State of Nature Reports and State of Nature Summary for England. (2019). National Biodiversity Network.

¹⁰³ Lewisham Open Space Review (2022) and Re-Survey of Sites of Importance for Nature Conservation (2016).

¹⁰⁴ International sites are designated under European Union Council Directive on the conservation of wild birds (79/409/ EEC) 1992, European Union Council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) 1992 and Ramsar Convention on wetlands of international importance.

international or national nature conservation sites¹⁰⁴. However there are 4 such sites within 15 kilometres of the Borough boundary which, given their proximity, have the potential to be impacted by development. These sites include the Lee Valley Special Protection Area (SPA) and the Richmond Park, Wimbledon Common and Epping Forest Special Areas of Conservation (SAC). Where a development proposal has the potential to impact on a site by virtue of its location, nature of use or scale, then applicants should consult Natural England to confirm whether a Habitats Regulations Assessment is required. Development proposals likely to have significant adverse impacts on international or national sites will be considered against relevant national planning policies and legislation.

10.16 Development proposals must clearly identify biodiversity interests both within and in proximity to the site and assess impacts on them. They should demonstrate how the development will respond positively to these interests. The NPPF sets out principles for determining planning applications where there is a potential or likely harm to biodiversity. These are reflected both by the London Plan and this policy. Where it is clearly and convincingly demonstrated that harm to biodiversity¹⁰⁵ cannot reasonably be avoided then appropriate mitigation measures will be

required, with biodiversity offsetting used as a last resort. Mitigation measures should support implementation of Lewisham’s Biodiversity Action Plan and may be secured by way of planning obligations or planning conditions. Proposals must clearly address why mitigation measures are necessary and any such mitigation must be agreed with the Council in advance of the commencement of development.

10.17 Proposals for major development and other development with a potential to have a direct or indirect impact on a SINC, LNR or other site with biodiversity interest must submit an up-to-date Ecological Assessment. This must be carried out by a chartered ecologist, such as one registered with the Chartered Institute of Ecology and Environmental Management (CIEMM). Surveys should be carried out during an optimal time of the year for observation. They must contain a sufficient amount of detail to identify and consider the relevant biodiversity interests and potential impacts on them. Applicants are expected to make surveys available to Greenspace Information for Greater London (GiGL) to assist in the collection of information in Lewisham and the region, and aid in the future delivery of the Lewisham Biodiversity Action Plan. Development proposals should

¹⁰⁵ National Planning Policy Framework. 2021. Paragraphs 80-83.

consider biodiversity taking into account the relationship between different land uses within and in proximity to the site, along with amenity considerations such as lighting and shading.

- 10.18 The Environment Act 2021 introduces provisions for Biodiversity Net Gain. The mandatory requirement for BNG on qualifying developments will apply in England and are to be brought into force through future amendments to the Town and Country Planning Act¹⁰⁶. To ensure the alignment with the new legislative framework the Local Plan seeks that development proposals secure BNG. The BNG benchmark is a minimum 10 per cent increase in habitat value for wildlife compared with the pre-development baseline, calculated using an appropriate Biodiversity Metric¹⁰⁷. The Lewisham Local Plan Viability Assessment (2022) indicates that this requirement will have a negligible impact on development viability¹⁰⁸. Policy GR3.E will be used as a guide until such time further legislation and national policy take effect. BNG should normally be delivered on-site. However flexibility may be applied on a case-by-case basis where it is demonstrated that on-site provision is not feasible or off-site contributions will provide greater biodiversity benefits, for example, by contributing to the restoration or recovery of habitats within sites

¹⁰⁶ The Government published a consultation on Biodiversity Net Gain Regulations and Implementation which ran from January to April 2022.

¹⁰⁷ The Government published the BNG 3.1 Metric (JP039) on 21 April 2022. This should be used as a guide for calculating BNG, or where appropriate, a future equivalent.

¹⁰⁸ The study tested BNG to be secured in perpetuity by applying an increase in build costs of 0.8 per cent, which is the upper end of the range indicated in the 2019 DEFRA report Biodiversity Net Gain and Local Nature Recovery Strategies Impact Assessment.

or areas identified in a LNRS or other similar document. Development proposals should refer to good practice guidance such as the British Standard BS 8683:2021 Process for designing and implementing Biodiversity Net Gain.

- 10.19 Development proposals may be required to be accompanied by a Management Plan. This will normally be secured by way of planning condition. The need for a Management Plan will be established on a case-by-case basis taking into account the biodiversity interests on or in proximity to the site, as well as the nature and scale of development proposed. Management Plans can help to ensure that habitats and species are not harmed during the construction process, and that that site specific interventions and mitigation measures are fulfilling their objectives over the lifetime of the development, including through regular maintenance and monitoring. Applicants are strongly encouraged to liaise with local stakeholders, including the Lewisham Biodiversity Partnership, to discuss opportunities for support in this regard.
- 10.20 Access to nature is important as it offers opportunities for respite, relaxation and education. People in Lewisham generally benefit from good access to green and open spaces. However in some parts of the Borough people do not enjoy easy access to green spaces with wildlife value. Localities where people are further than 1 kilometre walking distance from a publicly accessible site of Metropolitan or Borough level SINC are defined by the London Plan as 'areas of deficiency'. Lewisham has 5 such areas covering 14 per cent of the Borough. The largest of these is located in the northwest, spreading from the River Thames in the north

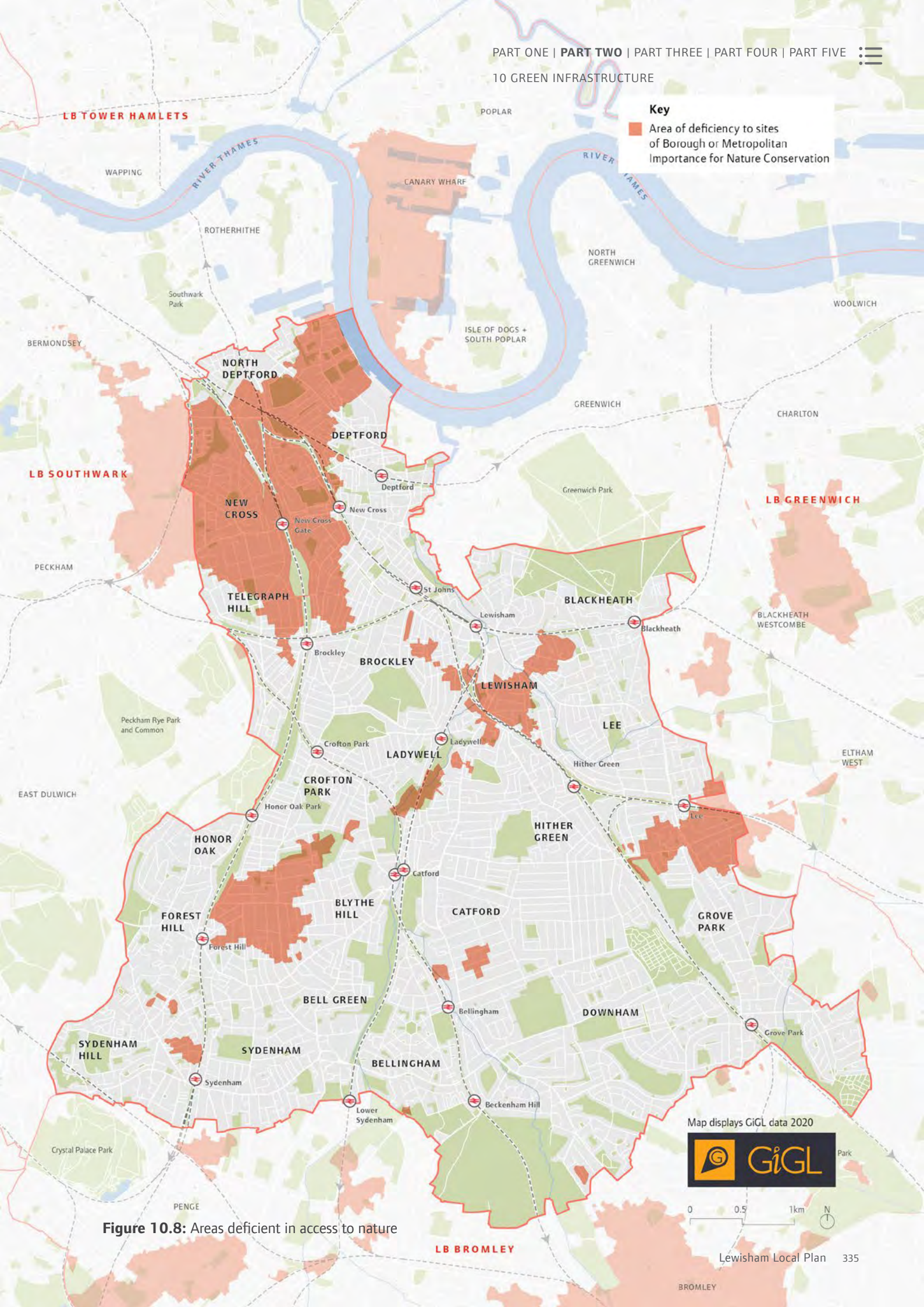
to Brockley in the south and the boundary with Southwark in the east. The other four areas, which are smaller and more discrete, are located around Deptford, Forest Hill, Lee and Lewisham town centre. Where new development comes forward opportunities should be taken to introduce additional biodiversity features across the Borough, and particularly in the areas of deficiency. Further information is set out in the Lewisham Re-Survey of Sites of Importance for Nature Conservation Study (2016). Development proposals, should refer the deficiency maps developed by Greenspace Information for Greater London (GiGL). These are regularly updated taking into account the latest available information on nature sites, and use a method of accurately mapping areas of deficiency in public access based on actual walking distances along roads and paths.

- 1 Hilly Fields
- 2 Sydenham Wells Park
- 3 Manor House Gardens
- 4 Beckenham Place Park





Figure 10.7: Designated nature conservation sites

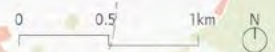


Key
Area of deficiency to sites of Borough or Metropolitan Importance for Nature Conservation

Map displays GiGL data 2020



Figure 10.8: Areas deficient in access to nature





GR4 Lewisham Links

- A The Council will promote and work with stakeholders to deliver the Lewisham Links a connected network of high quality walking routes and cycleways, public open spaces, green spaces, nature sites and other visitor destinations across the Borough.
- B Development proposals must provide for public realm enhancements to support the delivery of the Lewisham Links where they are located adjacent to an existing or proposed route of the Lewisham Links, or where an existing or proposed route is located within the site. High quality public realm must be provided with reference to Policy QD3 (Public realm) and TR3 (Healthy streets and part of healthy neighbourhoods). The specific nature of public realm enhancements will be considered on a case-by-case basis and may include:
- a. New or enhanced footpaths or cycleways;
 - b. Road realignment;
 - c. Street crossings or other safety measures;
 - d. Cycle parking including space for cycle hire;
 - e. External lighting;
 - f. Landscaping;
 - g. Tree planting or other green infrastructure;
 - h. Drinking water fountains;
 - i. Public conveniences; and
 - j. Way-finding signage.
- C To support the effective implementation of the Lewisham Links development proposals must have regard to the Council's Parks and Open Spaces Strategy.

Explanation

- 10.21 This policy forms a key part of the Local Plan approach to delivering healthy, liveable and sustainable neighbourhoods. The Lewisham Links will help to ensure that people throughout the Borough are both encouraged and enabled to make more journeys by active travel modes, taking advantage of a high quality and well-connected network of walking routes and cycleways. The Lewisham Links will improve people's access to and between parks, open spaces, community facilities, and other key visitor destinations such as town centres and public transport nodes. The policy builds on the success of the North Lewisham Links Strategy. This sets out a programme of public realm improvements focused on priority walking routes and cycleways, or 'links', parts of which have now been delivered. The Strategy was developed in response to issues of severance caused by major roads and railways in Deptford and New Cross, as well as the need to secure new infrastructure to support growth and regeneration.
- 10.22 Development proposals must make provision for public realm enhancements where the site contains or is adjacent to an existing or proposed route of the Lewisham links. The specific nature of public realm enhancements will be considered on a case-by-case basis taking into account the nature of the development along with the site size, location and contribution required to support the effective functioning and quality of the Lewisham Links. Further details are set out in Part 3 of the Local Plan for each of the Borough's character areas. Whilst the Lewisham Links will connect a wide variety of visitor destinations there is a strong focus on connections to and between green spaces. Development proposals should therefore refer to the Lewisham Parks and Open Spaces Strategy.

GR5 Urban greening and trees

- A Development proposals must demonstrate how the design-led approach has been used to maximise opportunities for urban greening. This includes the integration of high quality and species diverse landscaping, street trees, wildlife habitat, green roofs and walls and Sustainable Drainage Systems. They must be designed with consideration given to the site context and the wider landscape setting as well as the layout, design, construction and long-term management of buildings and spaces.
- B Development proposals must respond positively to landforms including by retaining or enhancing landscape features of historic, ecological and visual amenity value.
- C Major development proposals must increase green cover on site to achieve the recommended target Urban Greening Factor (UGF) in the London Plan, unless it can be suitably demonstrated that this is not feasible. The target UGF score is 0.4 for predominantly residential development and 0.3 for predominantly commercial development (excluding B2 and B8 uses). Existing green cover retained on-site will count towards the target score. Planning contributions may be sought where the target UGF is not achieved.
- D Development proposals should maximise the use of green roofs and walls. Major development proposals will be expected to demonstrate that the feasibility of integrating these measures has been fully investigated, and minor development proposals are strongly encouraged to incorporate them. Green roofs and walls will be supported where they are appropriately designed, installed and maintained. Development proposals should have regard to the latest industry good practice guidance to help ensure that green roofs and walls are designed to maximise environmental benefits and will function effectively over the lifetime of the development.
- E Development proposals must seek to retain existing trees as well as the associated habitat with regard for the urban forest, with reference to Policy GR3 (Biodiversity and access to nature). They should also maximise opportunities for additional tree planting particularly in urbanised locations such as streets and town centres. Development proposals must demonstrate that they will:
 - a. Provide for the sensitive integration of all trees whilst ensuring any new or replacement on-site provision is of a high ecological quality (including appropriate species, stem girth and life expectancy) and contributes positively to the microclimate;
 - b. Protect veteran trees and ancient woodland;
 - c. Retain trees of quality and associated habitat, wherever possible, with appropriate arrangements to secure their protection throughout demolition, construction, and external works, to the occupation stage of development;
 - d. Avoid the loss of, and mitigate against adverse impacts on, trees of significant ecological, amenity and historical value;

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- e. Ensure building foundations are sufficient to be climate change resilient in proximity to trees; and
 - f. Ensure adequate replacement tree planting where the retention of trees is not reasonably practical, with replacement provision that meets the requirements of (a) above.
- F Development proposals should avoid, and the Council will refuse, the removal of protected trees (i.e. those covered by a Tree Protection Order and trees within Conservation Areas) and developments that will have a detrimental impact on the health of protected trees and visual amenity provided by them . The Council may identify and seek to protect trees that are of a significant amenity, heritage, ecological, or other value through the development management process.
- G Major development proposals, and where appropriate other development proposals, will be required to submit a Landscape Design Strategy and Arboriculture Survey to demonstrate that landscaping and other urban greening measures are appropriate to the site, can be implemented effectively and will be suitably managed over the lifetime of the development.

Explanation

- 10.23 Urban greening is a term used to describe a wide range of measures that can be incorporated into buildings and spaces to increase green cover in the Borough. These measures include but are not limited to: tree planting, naturalised biodiverse landscaping, green roofs and walls, hedges, climbers, plants for pollinators, de-paving, rain gardens and sustainable drainage systems using natural or semi-natural features. Urban greening can provide multifunctional benefits such as for climate change resilience, amenity including air quality, nature conservation and local character.
- 10.24 The London Plan sets the Urban Greening Factor (UGF) requirement for major developments. The UGF is a model used to provide a baseline for the amount of green cover that development will be expected to achieve, taking into account various site development factors. We will apply the recommended UGF factors for major residential and commercial development as set by the London Plan. Existing green cover retained on site as part of a development proposal will count towards the target UGF score. Relevant major development proposals should meet and seek to exceed the target score. Some flexibility may be applied on a case-by-case basis where it is suitably demonstrated that the target cannot be achieved for reasons of technical feasibility or financial viability, in which case proposals should show that they have been designed to achieve the highest score possible. Development proposals should refer the Mayor's Urban Greening Factor SPG¹⁰⁹.
- 10.25 Green roofs and walls will normally be required as part of the package of urban greening measures delivered on sites. They will be supported where they appropriately respond to local character and comply with other Local Plan policies. This includes consideration for the historic environment, where development must preserve the significance of heritage assets. Green roof assembly should as a minimum consist of a root repellent system, a drainage system, a filtering layer, a growing medium and plants, and be installed on a waterproof membrane on an applicable roof. Buildings should be designed to have sufficient structural capacity and integrity to resist all loads for soil, moistures, plants, rain and wind uplift, safely, effectively and permanently. It is important that living roofs are included in the early planning and design stage and supported by a qualified and accredited installer. Green roofs should be designed in with photovoltaic panels. Development proposals must demonstrate how the installation and maintenance will comply with the latest industry standards, currently the Green Roof Code of Best Practice for the UK 2014, or any national equivalent.

¹⁰⁹ Urban Greening Factor Guidance. Greater London Authority. The draft guidance was published in September 2021.

Trees

- 10.26 Trees and the urban forest are an integral part of the Borough's network of green infrastructure and have many beneficial functions. In addition to enhancing local character and amenity, including air quality, they provide extensive areas of habitat for wildlife. Trees also have an important role in climate change adaptation and mitigation. For example, they reduce strain on drainage systems by absorbing rainfall and enable positive microclimatic effects through cover and shade. Recognising the significant environmental value of trees the London Plan sets out the Mayor's aspirations to increase tree cover in London by 10 per cent by 2050, which this policy provides support for. The London Environment Strategy (2018) and London Urban Forest Plan (2020) provide further details on tree canopy cover and the urban forest.
- 10.27 Trees should be considered at the early stages of the design-led approach in order to maximise their many beneficial effects. Where development proposals include elements of public realm tree provision must be commensurate with the nature and scale of development. Development proposals will be expected to retain and protect existing trees, ensuring they can be sustained over the long-term. This includes trees of quality which are Category A and B trees as defined by British Standard BS5837:2012 and also Category C & U trees within biodiverse habitat areas. New development should not result in an unacceptable harm to or loss of trees, particularly where these are protected by a Tree Preservation Order, are located in a Conservation Area or make a significant contribution to local ecology, public amenity and local character, including historic

character. Whilst acknowledging the Council has limited control in terms of the protection of trees in private residential gardens, it will seek to promote the multifunctional benefits of trees and prevent the loss of trees wherever possible.

- 10.28 Where it can be suitably demonstrated that the loss of a tree is acceptable, such as when the tree is considered dangerous to the public or where its removal is necessary to secure site redevelopment consistent with the spatial strategy, then replacement planting will be required. Priority will be given to on-site replacement unless it can be demonstrated there are exceptional circumstances which necessitate off-site provision, in which case planning contributions may be sought. When a financial obligation is required for replacement trees the value may be calculated using the Capital Asset Value for Amenity Trees (CAVAT) or a similar methodology. Financial contributions will be expected to include on-going maintenance costs where trees are planted in the public realm.
- 10.29 New or replacement species should be selected to avoid the risk of decline or death arising from increases in non-native pests and diseases. Where new trees are to be planted, the species type should be chosen using the 'Right Place Right Tree' approach as advocated by the Mayor's London Tree and Woodland Framework. When purchasing trees, they should be responsibly sourced ideally from a domestic nursery with UK grown or imported trees appropriately quarantined for a minimum of one year within the UK before sale. This ensures plant health and non-infection by foreign pests or disease.

10.30 The Council makes Tree Preservation Orders (TPOs) to protect specific trees or particular areas, groups or woodland with amenity value from deliberate damage and destruction. If a tree is subject to a TPO, consent will be required before any work that might affect the tree can be carried out. It is a criminal offence to prune, fell or damage protected trees without appropriate consent and the Council will enforce breaches in accordance with relevant policy and legislation.

Landscape design strategy

10.31 A site’s landscape and its relationship to existing and future development, and immediate surrounds, should be considered comprehensively from the start of the design-led approach. Proposals should have regard to the existing character of the site including landform and features of the natural landscape (such as trees on or in proximity to the site). Where existing landscapes contribute to local distinctiveness, development should respond positively to those features. Applicants are encouraged to refer Lewisham’s Characterisation Study as a useful starting point for understanding landscape features in the Borough.

10.32 A Landscape Design Strategy must be included with all major development proposals and proposals for sites where a Tree Preservation Order is in place. Other applications may also be required to provide this information having regard to individual site circumstances and the biodiversity interests involved. The Landscape Design Strategy must include an assessment of the relevant site features and nature conservation interests, details of work required to ensure the successful implementation of the strategy, and a Management Plan. The Management

Plan should address maintenance of hard and soft landscaping features over the lifetime of the development, with specific details covering a minimum 5-year period from occupation. Considerations may include: planting plans with species, frequency of maintenance operations such as weeding, irrigation and the use of hydration bags for trees, checking stakes and ties, plant condition, mowing times for long grass sward areas, materials and minimising hard surfacing, details of building subsidence and other liabilities such as climate change resilient foundations within zone of influence of trees, permeable surfacing and SUDs drainage, wildlife connectivity such as hedges for boundary treatment and hedgehog gaps when fencing is used, underground services and infrastructure in relation to root protection areas of existing trees and new tree planting areas, security and access arrangements to landscaped areas.

10.33 Arboriculture Surveys should be undertaken separately and help to inform the Landscape Design Strategy, where one is required. Surveys should provide details of existing species (with information on spread, roots and position of trees), details of trees affected by the development (including measures to be taken to protect retained trees during the construction process), and other plans for the positive management of trees. Plans and documents will be expected to be submitted in accordance with the British Standards 5837 (2012).

GROW-MAYOW COMMUNITY

Community
Square SE26 4JA
Sydenham

WELCOME TO



Grow Mayow
Community garden

GR6 **Food growing**

- A Allotments and community gardens will be protected in order to support sustainable food growing locally and to enhance opportunities for leisure, social interaction and education.

- B Major development proposals for housing and proposals for community facilities are encouraged to include provision of space for community gardening and food growing. Where such existing provision exists and a site is to be redeveloped, this should be retained or re-provided.

Explanation

10.34 Allotments and community gardens form part of the Borough's network of green infrastructure. They are an important resource for local food production, support biodiversity and promote sustainable communities, for example, by providing opportunities for recreation and social interaction. For children and young people food growing offers opportunities for education outside of the traditional classroom setting. Allotments and community gardens are invaluable to those who do not have access to a private garden and therefore help to promote more inclusive communities. Whilst recognising that private gardens provide opportunities for food growing, this policy does not apply to gardens as these are dealt with separately in the Local Plan.

10.35 All major development proposals for residential and community uses are encouraged to incorporate provision for food growing. This should be considered early in the design-led approach so that provision is of a high quality, suitably meets the needs of the intended end users, and is accessible to people of all ages and abilities. Consideration should also be given to the integration of ancillary facilities, such as storage space for equipment and connections to water sources, which are vital to ensuring that provision is convenient and functional.



Grow Mayow Community Garden

GR7 Geodiversity

- A The Council will protect the Borough’s geodiversity assets and seek to promote understanding of them by:
- a. Designating a Regionally Important Geological Site at Beckenham Place Park;
 - b. Designating Locally Important Geological Sites at Old Gravel Pit, Blackheath and Buckthorne Cutting, Crofton Park; and
 - c. Ensuring development proposals make a positive contribution to the protection and enhancement of designated geodiversity sites and other sites of geological interest.

Explanation

- 10.36 Geodiversity involves the many components that make up the landscape and its character. This includes physical features, such as rocks and soils, as well as the processes that help shape landforms such as erosion and sedimentation. An awareness of geodiversity helps us to understand our environment and how we can better adapt to it. As geodiversity is a natural resource that cannot be replaced or recreated it is important that geological interests are appropriately managed.
- 10.37 The Local Plan designates 3 geological sites of strategic importance which are set out in the Policies Map. The designations have been informed by research prepared by the Natural England and the London Geodiversity Partnership¹¹⁰, which supports the London Plan and its associated Supplementary Planning Guidance. The designated sites comprise:
- Regionally Important Geological Site (RIGS) at Beckenham Place Park. This RIGS consists of a small portion of land near the park's entrance which is notable for its natural exposures of clay and sands, known as the Harwich Foundation. The exposure benefits from its location at either side of a Green Chain walk within the park where there is good opportunity for public access.
 - Locally Important Geological Site (LIGS) at Old Gravel Pit, Blackheath. This LIGS is located at the edge of an open space and features sand and gravel, also from the Harwich Foundation, which are visible despite being overgrown by grass.
 - Locally Important Geological Site at Buckthorne Cutting, Crofton Park. This LIGS is located at a railway cutting and features clay, silt and sand from the London Clay Formation. The site forms part of a Local Nature Reserve where there are opportunities for public access.
- 10.38 We will protect the geodiversity interests at these sites and promote appreciation and understanding of them, such as by supporting way finding signs, interpretative boards and public access improvements where appropriate. The London's Foundations SPG and associated research should be referred for further information on site characteristics and promotional opportunities.

¹¹⁰ London's Foundations: Protecting the Geodiversity of the Capital Supplementary Planning Guidance (2012) and Revised Site Assessments for London's Foundations (2021). Greater London Authority.

10.39 There are other sites within the Borough that have been identified as sites of geological interest but which have not been designated as RIGS or LIGS in the Local Plan. These include, for example, the New Cross Cutting Nature Reserve and at Ladywell. The Council will continue to work with stakeholders including the London Geodiversity Partnership to explore opportunities to support the protection and management of such sites.



Site of geological interest in Beckenham Place Park



Harwich Formation boulders and outcrop at Beckenham Place Park

