



Lewisham

Housing Regeneration and Environment Directorate

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# **Strategic Environmental Assessment Final Screening Report**

For The Small Sites Study:  
Small Sites Development Strategy &

## **Small Sites Design Guide Supplementary Planning Document (SPD)**

Strategic Development – Housing Growth Team

Laurence House \*

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London

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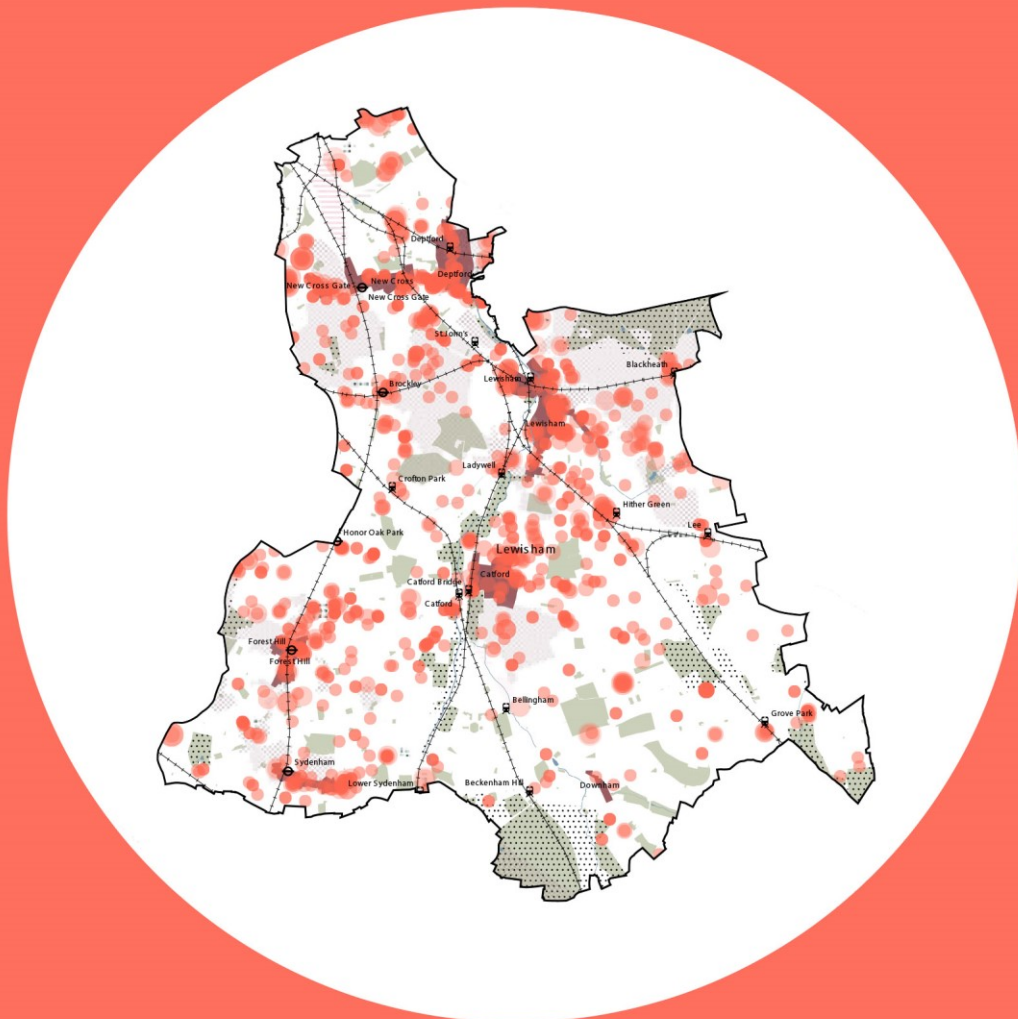
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January 2021

\*Due to Covid-19 our officers are working from home and any post that comes to the team will be collected but not looked at immediately, therefore any correspondents should be directed via email or via phone call.





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## 1. INTRODUCTION

- 1.1 The London Borough (LB) of Lewisham is preparing a Supplementary Planning Document (SPD) to provide design guidance for Small Sites Development throughout the LB of Lewisham. This will aim to make the best use of available land, increase the delivery of affordable new homes and improve streetscapes and public realm of left over or under-developed plots of land across all the wards within the borough.
- 1.2 Small Sites is currently defined as a site of 0.25 Ha. This SPD will focus on design guidance for these sites specifically, with the aim of increasing the number of windfall application that come forward to planning throughout the LB of Lewisham.
- 1.3 This Strategic Environmental Assessment (SEA) screening is being prepared in accordance with the requirements of Directive 2001/42/EC of the European Parliament and of the Council on the Assessment of the Effects of Certain Plans and Programmes on the Environment and the Environmental Assessment of Plans and Programmes Regulations 2004. The following guidance has also been taken into account:
- The National Planning Policy Framework (NPPF) (DCLG, 2012, as updated 2019).
  - The National Planning Practice Guidance (PPG ID: 11) in relation to SEA/SA (DCLG, 2015).
  - A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005).
- 1.4 The screening consultation is being prepared to enable the specified statutory consultation bodies (Natural England, Historic England and the Environment Agency) to comment on the appropriateness of the screening process for this proposed SPD. Other bodies that have specifically been invited to comment are:
- Greater London Authority
  - London Borough of Greenwich
  - London Borough of Bromley
  - London Borough of Southwark
- 1.5 Comments were invited to be made in writing and returned by 14<sup>th</sup> December 2020 to the Housing Growth Team at:
- **Post** : SEA Screening Consultation (Small Sites Study), Strategic Development – Housing Growth Team, London Borough of Lewisham, Laurence House, 1 Catford Road, Catford, LONDON SE6 4RU\*
  - **Email** : [Housing.Strategy@lewisham.gov.uk](mailto:Housing.Strategy@lewisham.gov.uk)
- \*During the current COVID-19 restrictions officers will be working mostly from home with limited access to the above address, though this will be monitored it is recommended that any postal documents are also sent via email to the above email address.

## 2. POLICY BACKGROUND

- 2.1 The Lewisham Core Strategy (2010) defines small site development mostly as Infill Development. About that it states:
- Spatial Policy 5: Areas of Stability and Managed Change** in 6.147 titled 1D infill development it states: *Evidence on past housing completions through the Annual Monitoring Report shows a consistent supply of smaller infill development within these established residential areas. The Council wants to achieve the best use of previously developed land in the borough and will consider infill development provided that it is*



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*designed to complement the character of surrounding developments, the design and layout make suitable residential accommodation, and it provides for garden and amenity space. Any adverse impact on neighbouring amenity, conservation and historic issues, biodiversity or open space will need to be addressed.*

- ii. Paragraph 6.176, which also relates to Spatial Policy 5 states: *Redevelopment opportunities in these localities particularly around stations may provide scope for higher density redevelopment. The primary considerations will be guided by the accessibility to public transport, local character and urban design principles, which aim to establish place making as part of any redevelopment.*
- iii. **Core Strategy Policy 15** which also states under the heading Areas of Stability and Managed Change (6)(b): *Small scale development, including infill development, will need to be designed and laid out to, complement the character of surrounding development, provide suitable residential accommodation with a high level of amenity and provide for garden and amenity space. Any adverse impact on neighbouring amenity, conservation areas and designated and non-designated heritage assets, biodiversity or open space will need to be addressed.*

2.2 As the Small Sites SPD covers the whole of the borough it is important to note that areas such as the Lewisham, Catford and New Cross Opportunity areas, though able to follow this guidance should also refer to those area specific policies and other SPD's for example the New Cross Gate area SPD and A21 Design Guidance SPD.

2.3 The Lewisham Characterisation Study (2019) which will inform the emerging Local Plan mentioned Small Sites and Infill Development within its intensification opportunities. These are explained through the defined borough types of perimeter blocks and expresses intensification opportunities within each perimeter block type. The Small Sites SPD will build of these defined housing typologies and the opportunities within the characterisation study.

2.4 DM Policy 33 in the Lewisham Development Management Local Plan (2014) headed Development on Infill sites, back land sites, back garden and amenity areas states general principles which are:

1. *Depending on the character of the area and the urban design function a space fulfils in the streetscape, some sites will not be considered suitable for development and planning permission will not be granted.*
2. *If a site is considered suitable for development, planning permission will not be granted unless the proposed development is of the highest design quality and relates successfully and is sensitive to the existing design quality of the streetscape, and is sensitive to the setting of heritage assets. This includes the spaces between buildings which may be as important as the character of the buildings themselves, and the size and proportions of adjacent buildings.*
3. *Development on these sites must meet the policy requirements of DM Policy 30 (Urban design and local character), DM Policy 32 (Housing design, layout and space standards) and DM Policy 25 (Landscaping and trees).*
4. *Development on these sites should retain existing formal or informal pedestrian through routes.*

2.5 DM Policy 33 in the Lewisham Development Management Local Plan (2014) goes onto define the types of development appropriate, this is the development types that the small sites SPD will give guidance on:



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### **A. Infill sites**

*Development within street frontages and on street corners will only be permitted where they:*

- a. make a high quality positive contribution to an area*
- b. provide a site specific creative response to the character and issues of the street frontage typology identified in Table 2.1 Urban typologies in Lewisham and to the special distinctiveness of any relevant conservation area*
- c. result in no significant overshadowing or overlooking, and no loss of security or amenity to adjacent houses and gardens*
- d. provide appropriate amenity space in line with DM Policy 32 (Housing design, layout and space standards)*
- e. retain appropriate garden space for adjacent dwellings*
- f. repair the street frontage and provide additional natural surveillance*
- g. provide adequate privacy for the new development and*
- h. respect the character, proportions and spacing of existing houses.*

### **B. Backland sites**

*New development on sites of this type will only be permitted where they provide:*

- a. a proper means of access and servicing which is convenient and safe both for drivers*
- b. and pedestrians*
- c. no significant loss of privacy, amenity, and no loss of security for adjoining houses and*
- d. rear gardens and*
- e. appropriate amenity space in line with the policy requirements in DM Policy 32 (Housing*
- f. design, layout and space standards).*

*Gated developments on these sites that prevent access which would normally be provided by a publicly accessible street will not be supported.*

### **C. Back gardens**

*The development of back gardens for separate dwellings in perimeter form residential typologies identified in the Lewisham Character Study will not be granted planning permission. Private back gardens in all urban typologies should be retained in development proposals involving new separate dwellings.*

### **D. Amenity areas**

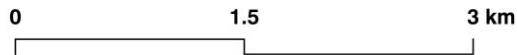
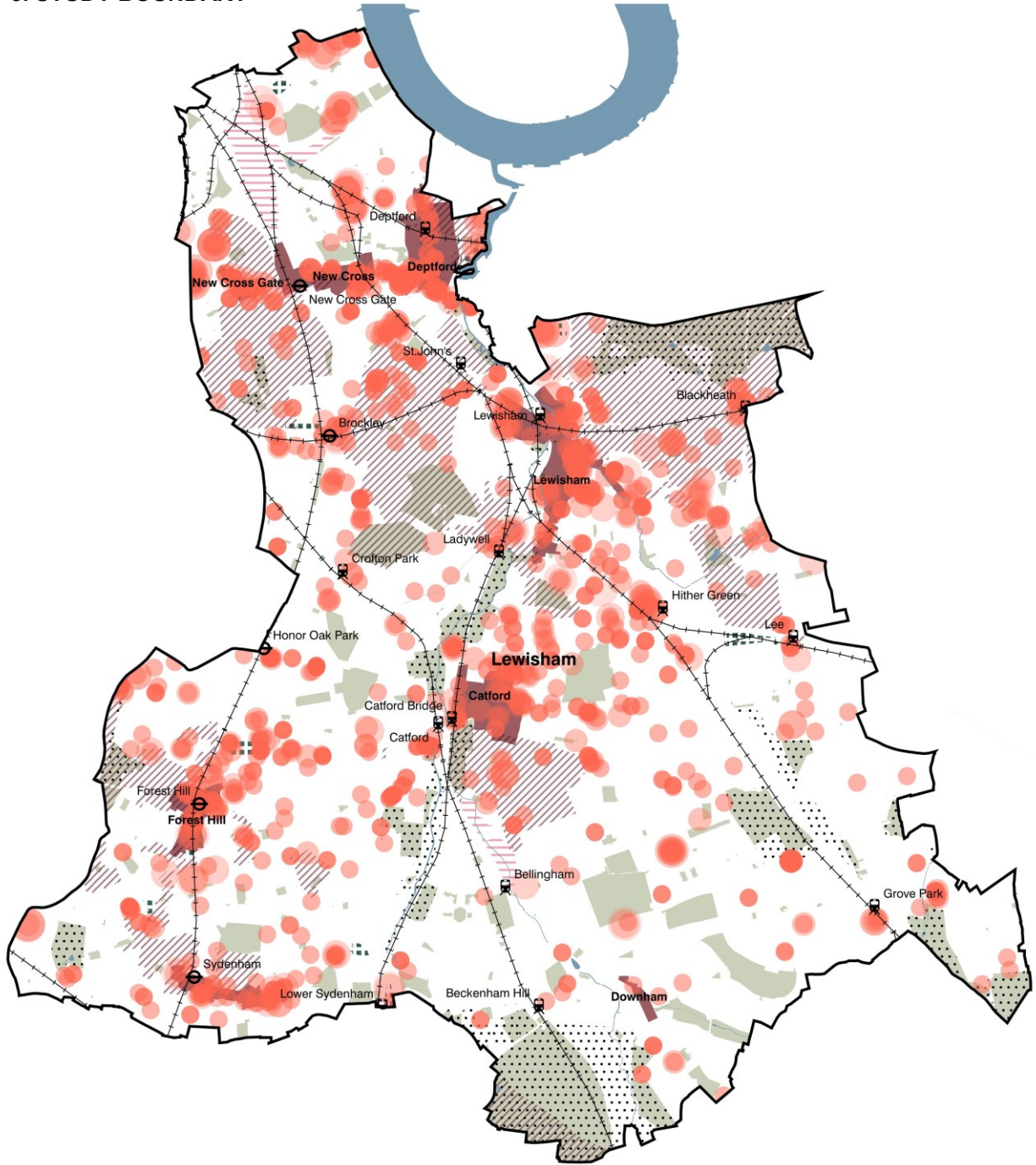
*Proposals for new residential development on amenity areas of landscaped open space attached to existing residential development will only be permitted where they:*

- a. repair or re-provide active street frontages*
- b. increase natural surveillance*
- c. retain existing private rear gardens where they are provided*
- d. retain adequate amenity space for the existing development according to the requirements of DM Policy 32 (Housing design, layout and space standards)*
- e. provide no significant loss of privacy and amenity, and no loss of security for adjoining residential development and private back gardens and*
- f. provide adequate privacy for the new development.*



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## 3. STUDY BOUNDARY



### Borough Boundary



### Geographic Features

#### Waterways



#### Stations

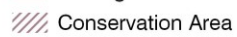
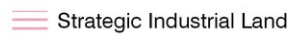


### London Development Database

#### Housing Approvals - Small Sites



### Planning Constraints





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### 4. PROCESS AND SCOPE

- 4.1 This Screening Report has been prepared in accordance with Section 9(3) of the SEA Regulations 2004 and is based on the Council's current scope of the Small Sites Design Guide SPD.
- 4.2 The purpose of the SPD:
- a. Will build on the policies within the adopted Local Plan (Core Strategy 2011, Site Allocations Local Plan 2013, Lewisham Town Centre Local Plan 2014 and Development Management Local Plan 2014).
  - b. Viewed in the context of the London Plan (December 2019 draft) and Draft Housing SPG prepared by the GLA.
  - c. It will also have relevance to the emerging Lewisham Local Plan (Regulation 18 Draft due late 2020) which will aim to futureproof the SPD.
  - d. It will follow on from typological and area definitions made in the Characterisation Study (2019).
- 4.3 Small Sites development has been identified as a key method of delivering much needed homes and, when done well, can contribute to the quality of spaces in local areas, allow for improved infrastructure and improve living conditions within and around new homes. This study aims to identify current issues in small site development in Lewisham, define a vision for small site development and support and guide quality small site development across the borough.
- 4.4 The Purpose of the SPD will be to provide further guidance on DM policy 33 and the relevant policies within the Core Strategy. It will not create any new policy or amend existing adopted policies. A proposed structure of the Small Sites SPD is set out below in section 5. Once produced, the draft of the Small Sites SPD will be subject to formal public consultation.

### 5. PROPOSED STRUCTURE AND OBJECTIVES

- 5.1 The Lewisham Small Sites study consists of three main components:
- i. An initial **Appraisal Study** of small sites typologies, stakeholders, opportunities and difficulties within the borough,
  - ii. A **Development Strategy** for small sites that will frame the vision and objectives for small site development across the borough, and identify potential areas for intensified small site development,
  - iii. Production of **Design Guide** in the form of a Supplementary Planning Document, which will guide small site development across the borough. This will be further defined by the production of elements i and ii.
- 5.2 It is the intention of the LB of Lewisham to formally adopt output iii (Small Sites Design Guide) as a Supplementary Planning Document (SPD) with statutory weight. Therefore, a robust consultation in line with Lewisham's Statement of Community Involvement will be a key component of the study.
- 5.3 LB Lewisham was successful in acquiring funding through the Homebuilding Capacity Fund in March 2019 to undertake a baseline and appraisal study and develop a strategy for Small Sites.
- 5.4 The project is being jointly funded by the Greater London Authority (GLA) and LB Lewisham, who together make up the client group. LB Lewisham will act as lead client and will manage the project.
- 5.5 The Council recognises that small sites will still play an important role in increasing housing supply in Lewisham in the future and supporting provision for a wide range of well-designed, high quality homes. The capacity of small sites should be explored and optimised throughout the





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borough, including for new small housing development in appropriate locations, in line with the draft London Plan. Lewisham's emerging Local Plan will be required to deliver a greater number of homes than the Core Strategy 2011 to meet the increased annual targets set out within the Draft London Plan.

5.6 The Small Sites SPD must also be in accordance with the policies in the current Lewisham Local Plan as the emerging Local Plan is in the early production stages and will not be adopted in advance of the SPD. Therefore we expect the SPD to be in accordance with Lewisham's adopted Core Strategy and to take account of London Plan (December 2019 Draft), alongside the Good Growth by Design Agenda where the policy is more relevant and up to date.

5.7 The Objectives of the **Small Sites Study** include:

- i. Realising the opportunity that exists for the development of a significant quantity of new homes across the Borough, by developing a strategic approach to small site intensification, to give developers more confidence in bringing their sites forward.
- ii. Proposals for intensification should be sensitive to the needs of the borough, raise local awareness of the project, and generate enthusiasm and momentum with both residents and Local Ward Councillors across the Borough.
- iii. Acknowledging and learning from similar endeavors by other councils, and creating a Lewisham-specific approach that responds to the borough's history, pattern of development, growth and housing needs, and topography.
- iv. Building on emerging GLA and other borough guidance to provide local specificity.
- v. Working with key stakeholders, such as RPs, private developers, local contractors and Architects who have experience delivering housing within the LB Lewisham to help shape the strategy and guidance.
- vi. Identification of type's sites/ broad areas for development and use of planning tools such as the Brownfield Land Register to ensure small/infill sites are publicly identified.
- vii. Optimising the ability to deliver genuinely affordable housing contribution by guiding applicants to deliver the maximum capacity on each site.
- viii. Providing clear guidance/principles for the development of infill/small sites, helping to mitigate/minimize planning risk, optimizing site capacities, and supporting the realisation of LB Lewisham's emerging spatial strategy for significant growth in residential suburban locations.
- ix. Templates for site selection and development protocols will give local RP's, SME's and other delivery partners a quicker route to deciding the viability of sites.



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## 6. SEA SCREENING PROCESS

6.1 The SEA screening procedure generally comprises of 6 stages, as detailed below:

Stage 1: Preliminary Assessment: to determine whether screening is necessary – *see Table 1.*

Stage 2: Assessment of likely Environmental Effects: if screening is required an assessment of the likely environmental effects, including any significant effects, will be undertaken in accordance with the SEA Regulations 2004 – *see Table 2.*

Stage 3: Draft Screening Report: a draft screening report will be prepared summarising the results of Stage 2 and including a draft determination as to whether the SPD is likely to have significant environmental effects – ***this document is the Draft Screening Report.***

Stage 4: Consultation with statutory bodies: the Environment Agency, Historic England and Natural England will be consulted on the Draft Screening Report. In this case, the council will consult additional stakeholders considered to have a strategic interest in this stage of the SPD preparation – *see paragraphs 1.4 – 1.5 and 8.5.*

Stage 5: Final Screening Report: consideration to be given to the responses from the three statutory bodies and other consultees and then a final version of the screening report prepared confirming:

- The result of the screening;
- Responses from the consultation bodies and other consultees;
- The final determination; and
- The statement of reasons if no SEA is required.

Stage 6: Final Screening Report made publically available: the Council will issue the Final Screening Report to each of the three statutory consultees and other consultees and make it publicly available for inspection.

## 7. SCREENING ASSESSMENT

7.1 The document “A Practical Guide to the Strategic Environmental Assessment Directive” (ODPM, 2005), sets out eight criteria that should be taken into account when screening a plan or programme to determine whether it will require SEA. The following Tables 1 and 2 provide LB Lewisham’s screening assessment using these criteria and the recommended methodology within the guide.

7.2 Whilst carrying out the screening assessment, the following national policy and guidance has been taken into account. Paragraph 165 of the NPPF (2012 and last updated 2019) states “A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors”.



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7.3 Paragraph 166 states that “Assessments should be proportionate, and should not repeat policy assessment that has already been undertaken”.

7.4 National Planning Practice Guidance (NPPG) (2016 and last updated 2019) states that:

*“Supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the Local Plan.*

*A strategic environmental assessment is unlikely to be required where a supplementary planning document deals only with a small area at a local level (see regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004), unless it is considered that there are likely to be significant environmental effects.*

*Before deciding whether significant environment effects are likely, the local planning authority should take into account the criteria specified in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004 and consult the consultation bodies.”* These are defined to be Historic England, Natural England and the Environment Agency.

7.5 Before answering the screening questions in Table 1, it is worth noting the context in which this SPD is set. The adopted Core Strategy has already been the subject of Sustainability Appraisal (including SEA) and this included the site allocations within the SPD study area. This SA/SEA process was undertaken throughout the plan preparation process. The Sustainability Appraisal for the Core Strategy was undertaken in September 2010. A separate Habitats Regulations Assessment Screening was also undertaken in February 2010. The relevant Sustainability Appraisal documents and the Core Strategy can be found on the Council’s website.

<https://lewisham.gov.uk/myservices/planning/policy/ldf/core-strategy/about-our-core-strategy-for-the-local-development-framework>.

**Table 1: Application of the SEA Directive to the Proposed SPD**

	<b>Screening Question</b>	<b>Screening assessment</b>
1.	Is the SPD subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority through legislative procedure by Parliament or Government ?	Yes. The SPD will be prepared and adopted by the London Borough of Lewisham in its role as Local Planning Authority.
2.	Is the SPD required by legislative, regulatory or administrative provisions?	. No. The preparation of a SPD is optional. However, once adopted by the LB of Lewisham it will be a material consideration in the determination of planning applications.



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3.	Is the SPD prepared for agricultural, forestry, fisheries, energy, industry, transport or waste management, telecommunications, tourism, town and country planning or land-use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive?	Yes. The SPD will not create new policy or land use designations but it will provide further guidance to support the Core Strategy, which is the town planning policy framework for its area and includes policies for land-use. However, the Core Strategy has been subject to full Sustainability Appraisal (including SEA).
4.	Will the SPD, in view of its likely effects on sites, require an assessment under Article 6 or 7 of the Habitats Directive?	No. The Core Strategy was subject to screening for the need for assessment under the requirements of the Habitats Directive and it was concluded that such assessment was unnecessary. As the SPD will not change or add to policy, proposals or designations within the Core Strategy it is not considered that further screening for such assessment is necessary as there would be no likely effects on European Sites.
5.	Does the SPD determine the use of small areas at local level, OR is it a minor modification of a plan subject to Article 3.2?	No. The SPD will complement the policies that have already been set within the Core Strategy. No aspects of the SPD will modify existing adopted policies nor seek to change existing site allocations, nor add new ones. The SPD will provide additional guidance on the types of small sites at the local level that are considered suitable for infill development, to supplement the policies in the Core Strategy.
6.	Does the SPD set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)?	No. This framework is already set within the Core Strategy. The SPD will provide further guidance on the implementation of these policies.
7.	Is the SPD's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget plan, OR is it co-financed by structural funds or EAGGF programmes 2000-2006/7?	No. The SPD does not fall into any of the criteria listed.



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8.	Is it likely to have a significant effect on the environment?	It is not likely that the SPD will have any significant effect on the borough, beyond those effects that have already been assessed through the Sustainability Appraisal (including SEA) of the Core Strategy.
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7.6 Table 2 establishes whether the SPD might have significant environmental effects by assessing the scope of the SPD against the criteria set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations (2004).

**Table 2: Determining the likely significance of effects**

	<b>SEA Directive Annex II: Criteria for determining likely significance of effects referred to in Article 3(5)</b>	<b>Comment</b>
1.	<b>The characteristics of plans and programmes, having regard, in particular, to:</b>	
1a)	The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	The SPD will provide further guidance to the policies, proposals and the allocations that are contained within the Core Strategy, which already sets the framework for infill development on small sites across the borough. The Core Strategy has been fully assessed for the purposes of SA/SEA.
1b)	The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The SPD, in providing further design guidance to the framework set within the Core Strategy, does not directly affect other specific public sector plans or programmes but rather is influenced by the Core Strategy and other higher tier planning policy and guidance, including the London Plan and NPPF.



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1c)	The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	The Core Strategy and other higher level policies set the context for achieving sustainable development. The SPD will provide further guidance as to how this should be achieved including how small sites can promote high quality, sustainable developments. The SPD will not revisit or change the higher level policy requirements and in the case of the Core Strategy, this has already been assessed through a full SA/SEA.
1d)	Environmental problems relevant to the plan or programme	The SPD will provide guidance on how to create sustainable developments that reduce the impact on the local environment and will encourage suitable bio diverse development based on a landscape led approach. This will help improve local biodiversity, streetscapes and the public realm at the local level.
1e)	The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).	It is unlikely that the SPD will generate any significant impacts that will prejudice the policies in other plans and programmes. The SPD will recommend how small sites follow existing policy and guidelines on water protection, waste management and other environmental plans for instant SUDS.
2	<b>Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</b>	
2a)	The probability, duration, frequency and reversibility of the effects	The probability, duration, frequency and reversibility of effects have been assessed within the full SA for the Core Strategy. There are no additional changes to the effects that would result from the preparation of the SPD. Whilst the SPD will provide further guidance that seeks to help increase the probability and frequency of windfall sites coming forward and producing more affordable housing across the borough, it will not predict the exact amount and location of new windfall sites. . For sites that do come forward for development, each planning application will be judged on its own



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		merit through the standard planning procedure and will assess the probability, duration, frequency and reversibility of the effects on the local environment.
2b)	The cumulative nature of the effects	Cumulative effects of the Small Sites Study have already been assessed within the SA for the Core Strategy. There are no likely cumulative effects that would result from the production of the Small Sites Design Guide SPD.
2c)	The trans-boundary nature of the effects	The study area of the SPD lies adjacent to the LBs of Bromley, Greenwich, Southwark and Tower Hamlets. Increasing the homes within the borough of Lewisham will help to meet local demand for housing and therefore reduce the need for residents to move outside of the borough to live. Local administrative trans boundary effects were considered as part of the SA/SEA of the Core Strategy.
2d)	The risks to human health or the environment (e.g. due to accidents)	The borough remains within the 20% most deprived local authorities in England, and is the tenth most deprived London Borough. The SPD will seek to enhance human health by providing guidance for designing homes that are environmentally sustainable and provide high quality living environments for people to reside in.
2e)	The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The spatial extent of the SPD will be the same as the area already covered in the Core Strategy. The SPD will aim to enhance the quality of the localised environment by enhancing the local streetscene and public realm, thereby providing positive benefits for both new and existing local residents. The magnitude and spatial extent of effects were considered as part of the full SA/SEA of the Core Strategy.



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2f)	<p>The value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> <li>I. special natural characteristics or cultural heritage,</li> <li>II. exceeded environmental quality standards or limit values</li> <li>III. intensive land-use</li> </ul>	<p>The value and vulnerability of the SPD study area have been considered as part of the full SA/SEA of the Core Strategy, including special natural characteristics and cultural heritage aspects. The SPD will take account of the value and vulnerability of all designated and non-designated heritage assets, open spaces and Sites of Importance to Nature Conservation within the SPD study area. Whilst the SPD will encourage development of infill sites, it is not expected to result in over development of land nor detrimentally impact on designated heritage, open space and nature conservation sites.</p>
2g)	<p>The effects on areas or landscapes which have a recognised national, Community or international protection status</p>	<p>There are no landscapes or areas of recognised national, community or international protection status that have been identified in relation to the SPD study area. However, further guidance on appropriate design will generate localised positive benefits in relation to landscapes, green spaces, local character and townscape.</p>

### 8. DRAFT DETERMINATION

- 8.1 An SEA screening assessment has been undertaken on the Small Sites Design Guide SPD, as detailed in Tables 1 and 2.8.2 It demonstrates that any effects resulting from higher tier planning documents including the 'parent policies' relevant to this SPD have already been considered and assessed by a separate full SEA through the Development Plan process.
- 8.2 The SPD does not propose any new policies, or the amendment of existing adopted policies, and will not allocate resources or direct other higher level plans and programmes.
- 8.3 In conclusion, the draft determination is that a SEA will not be required.

### 9. CONSULTATION

- 9.1 Following the draft determination that a SEA will not be required for the SPD, we consulted with the three statutory consultees and other consultees listed in Paragraph 1.4. Emails were sent to the seven consultees seeking their opinions on 12<sup>th</sup> November 2020 and a follow up email was sent on 9<sup>th</sup> December 2020. Comments were invited to be made in writing and returned to the Housing Growth Team by emailing [Housing.Strategy@lewisham.gov.uk](mailto:Housing.Strategy@lewisham.gov.uk) by 14<sup>th</sup> December 2020





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9.2 Table 3 provides an overview of the responses received, demonstrating that the consultees do not have any objections, that they concur with the findings of this report and that a full SEA is not required.

**Table 3: Overview of responses received**

Consultee	Response received
Natural England	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England have no comments to make on this consultation.
Historic England	Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process. We would agree that the SPD in question does not require a separate SEA given that the emerging local plan has been subject to a full Sustainability Appraisal. It should be noted that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposals which may subsequently arise from these documents, and which may have adverse effects on the environment.
Environment Agency	No comments received
Royal Borough of Greenwich	The Royal Borough of Greenwich has reviewed the SEA Screening Report for the Small Sites Supplementary Planning Document and agrees with your determination that a full SEA is not required as the impact has been assessed through the Core Strategy.
London Borough of Bromley	We have no comments on the document, which includes sensible consideration and assessment of relevant issues. The conclusion that an SEA is not required seems appropriate based on the assessment.
London Borough of Southwark	No comments received
GLA	No comments received



## **10. FINAL DETERMINATION**

10.1 An SEA screening assessment has been undertaken on the Small Sites Design Guide SPD, as detailed in Tables 1 and 2. It demonstrates that any effects resulting from higher tier planning documents including the 'parent policies' relevant to this SPD have already been considered and assessed by a separate full SEA through the Development Plan process. Consultation has taken place with seven consultees and their responses found that that they concur with the findings in this report.

10.2 Therefore the final determination is that a SEA will not be required for the Small Sites Design Guide SPD.