

## **Climate Action Lewisham response to the draft Lewisham Local Plan**



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Climate Action Lewisham is a local community group working to support and generate initiatives to reduce our collective greenhouse gas emissions and create thriving sustainable neighbourhoods in the face of the ecological crisis. We supported Lewisham borough to declare a Climate Emergency in 2019 and we have maintained a relationship with the council since then. We aim to communicate with the borough's communities about the ecological crisis and run projects which support local people to make greener choices and contribute to their sustainable communities across Lewisham. We would love to see Lewisham become a leader in reducing carbon emissions and supporting social justice and sustainable outcomes in collaboration with its people in decades to come.

### **1. Response to Strategic Objectives**

Climate Action Lewisham (CAL) welcomes the emphasis on the climate emergency and the way that this features in the strategic objectives of the plan (E: Responding to the climate emergency). We strongly believe that this must remain a key part of the plan.

With regard to the strategic objective, we believe that a key opportunity has been missed in terms of green jobs. In strategic objective C: *A thriving local economy that tackles inequalities*, objective 5 we would like to see a commitment to pursuing green jobs. This would strongly align with the priorities set out in this strategic objective of diversifying the local economy and could take advantage of national government policies and funding for green jobs (for example through the 80 million Green Recovery Challenge Fund). We address this further under our responses to Economy and Culture.

In addition, we believe that there are many places in part 2 of the plan where policies that enable the council to respond to the climate emergency must be strengthened (both in terms of language and content). We have outlined these below in our responses to part 2 of the plan below.

### **2. Response to Spatial Strategy**

We welcome the fact that the spatial strategy is underpinned by a commitment to development that protects, enhances and connects green infrastructure as well as development that responds to the climate emergency (OL1h p.66).

We feel, however that there could be more ambitious language surrounding this in the strategy. Whilst there is a commitment that all new development should respond to the climate emergency through adaptation and mitigation, we believe that responding to the climate emergency should also be part of wider decision making, for example in OL1b *Directing new investment to the Borough's strategic Area for Regeneration, and other local areas for regeneration, and coordinating the delivery of this investment to help tackle deprivation and ensure equality of opportunity within the context of an effort to tackle the climate emergency and strategically use the opportunities that this may bring*

## **Response to Part 2: Managing Development**

### **Economy and Culture**

Policy EC1 (p. 247) outlines the roadmap to a “Thriving and inclusive local economy” but the plan is missing an obvious and important opportunity to create employment and apprenticeships for green jobs. Policy EC9 B (P. 277) states the need for local developments to offer local apprenticeships but has no target or quota for green industry opportunities. The Local Plan must feature green job opportunities as central to development across the borough. Green employment opportunities should not be limited to building and trade but extend to civic life and the service industries as well as a whole range of other possibilities such as city farming, communal composting and environmental education. The intention to revitalise the arts sectors and night culture will necessitate additional infrastructure – this is an opportunity to create green jobs for example in regenerative waste management and sustainable procurement.

### **Community Infrastructure**

The Community infrastructure part of the plan gives details on the localisation of services such as childcare and health, and this is excellent, but retail, business and leisure provision on a local level need to be part of a landscape of local, accessible and human-level communities that are genuinely healthy and positive to live in. The principles of localisation that are explored in the community infrastructure section must not be siloed but rather need to be applied across the plan in particular with regard to creating sustainable transport that provides for residents’ needs within walking distance of their homes, supporting vibrant small business and attractive public realm on a local level so that the incentive to walk and cycle is higher than the disincentive to drive.

Closely linked into our comments on transport (below), we support the policy C13D (p.339) explained on page 341, point 9.17 that ‘incidental’ play spaces should be included in large-scale public realm developments. The net losers in car-dependent development are children, and this point, while marginal and seemingly incidental to the main thrust of the chapter, if implemented well will put children’s culture, development, enjoyment and safety at the heart of urban development. In a borough with a high proportion of very young people, this can only be a positive promise for the future.

### **Green infrastructure**

Our key concern with the green infrastructure section of the plan is the phrasing of policies and explanations which is frequently weak or ambiguous. Lewisham has declared itself to be in a state of climate emergency, yet the “Green Infrastructure” section has weak wording (for example “we expect” and “should”) and conditions that are far too easily negotiable for developers looking to maximise profit in lieu of preserving natural assets. For example, policy GR1B ‘Development proposals will be expected to investigate and maximise opportunities for enhancing existing green infrastructure and creating new provision on site through the design-led approach’. Or policy GR3B ‘developments...should also seek positive gains for biodiversity wherever possible’. This language is not concurrent with a genuine commitment to addressing the climate crisis. Words like ‘must’ in place of this weaker wording would ensure that future developments are in absolute alignment with the aims of the Climate Action Plan: this section must be rewritten accordingly in order to demonstrate that the crisis is being taken seriously.

In some areas, greater clarity is also required. For example, in policy GR3E (P. 367) it states that ‘a suitable qualified surveyor must carry out the ecological assessments. It is essential that all surveyors are independently appointed, and to the highest standard. Such professional requirements are outlined in reference to other parts of the document but must be specified according to each section in order to prevent potential exploitation, bias or unqualified decision making.

Additionally, policy GR2A Page 357(A) references “inappropriate” developments but fails to define what that means in this instance. Such loose wording will undoubtedly be exploited and must be rewritten to account for loopholes and misappropriation.

We welcome policy GR2H Neighbourhood forums and their contributions in identifying ‘appropriate sites to designate as Local Green Space in neighbourhood development plans’. However, page 361(10.10) states that ‘It is recommended that all such assessments apply a robust methodology and are published as part of the technical evidence base’. We would like further clarification on how forums will be supported in this process. The plan states that forum activity will be encouraged but not by what means or to what degree. In the interests of inclusion, diversity and representation, forum facilitation must be proactive and sincere.

### **Sustainable Design**

As in other areas, the approach to low carbon buildings in the Draft Lewisham Local Plan brings good intentions but fails to deliver ambition commensurate with a Climate Emergency. Many building energy policies in the plan need strengthening but there are three in particular which CAL believes need urgent revisions:

- A. The requirement for major developments to achieve a 35% reduction against current building standards (SDC3 on p.395) is particularly disappointing. National government has mandated a reduction of 31% in 2021 whilst the 2025 Future Homes Standard will require reductions of 75%. As a framework through to 2040, the current Draft Lewisham Plan cannot in our view be reconciled with a genuine desire to address the Climate Emergency. It is imperative that a significantly more ambitious requirement is adopted from today. Doing so will not only limit the contribution of new homes in Lewisham to the climate emergency but also ensure that Lewisham’s future residents are not left in homes unsuitable to 21<sup>st</sup> century requirements. The housing crisis of today will not be solved by building homes unsuitable for tomorrow.
- B. We recognise that heat networks have the potential to make a material contribution to Lewisham’s approach to low carbon heating (SD4B on p.395). However, historically there is a track record (including in some of Lewisham’s landmark developments) of simply swapping individual gas boilers for centralised plant rooms burning natural gas. As it stands, the current policy could lead to developers in some areas being encouraged to install a gas-powered communal heating system rather than individual air source, ground source or water source heat pumps. We recognise the council’s desire to provide ready offtake customers for future heat networks, but we do not believe that this should come at the expense of renewable solutions which could be deployed today. Heating hierarchies such as that proposed in SD4 D should be replaced with hierarchies which prioritise deployment of renewable heating today even where this makes connection to future heat networks more difficult. Lewisham does not have time to wait for future networks before starting to roll out low carbon heating in the borough.
- C. Whilst the Plan seeks to address the challenges of operational carbon emissions it remains completely silent on the embodied carbon emissions in new developments in Lewisham. The most energy efficient building could also be the highest carbon if the materials and techniques that it is built with release emissions at or prior to the time it is constructed. CAL believes that the Lewisham plan must include a requirement for all major developments to at least assess and in time to address the carbon embodied in their designs. [The London Energy Transformation Initiative (LETI) have provided extensive guidance on this element of low carbon design and we would urge the council to adopt their design guide as an aspiration and ultimately a requirement for all Lewisham development.]

It is also CAL’s view that policies in this area are not enough. Enforcement and planning practice is integral to successfully addressing the climate emergency in Lewisham’s new developments. Many

of the Lewisham Plan policies designed to limit carbon have “get out clauses” as in SD3 D where developers are invited to demonstrate that low carbon approaches are too expensive or not practical and pay for offsets instead. Currently this results in developments regularly being approved which will need significant retrofitting in the coming years to achieve net zero carbon. We urge the council to adopt a holistic approach to the Climate Emergency and ensure that throughout all departments and especially in planning, a rigorous approach to the net zero ambition is embedded.

### **Transport and connectivity**

We strongly support Lewisham’s ambitious target of 90% of journeys being by active travel or public transport by 2041, which exceeds the London-wide target of 80%. This is ambitious but the council must consider the whole borough and absolutely all development decisions if they are to have the possibility of achieving this target, and to prioritise how they support residents to use active travel and public transport in place of private vehicles. We applaud plans to ensure that blue badge access is protected and prioritised in all decisions, and the emphasis given to cycling facilities. The requirement on developers to submit healthy streets assessments (Policy TR3 B p.451) is excellent, and we would like to see the details of what stringent standards developments are required to reach and have a clear indication of the consequences of failure to meet them. Council clarity of priority and leadership in creating the kind of urban spaces that encourage and enable sustainable transport options is crucial.

However, there is a contradiction and a lack of leadership implied in the explanation to Policy TR4 F which says (p.457 12.24) that car-free and car-capped developments will only be ‘acceptable in principle where the development is located within a highly accessible location and within an area where there is an existing Controlled Parking Zone’. In reality, this excludes the majority of the borough as the PTAL map on page 442 shows: huge areas of the borough, including Sydenham, Forest Hill, Crofton Park, Downham, Bellingham, Hither Green and Lee Green and Brockley, as well as the far north of the borough, are all low in public transport access. Controlled Parking zones similarly only apply to 23% of the borough (central Lewisham, Blackheath, Lee Green, Hither Green, Rushey Green, Ladywell and part of Catford). It seems that Lewisham is not as committed as it may wish to seem to providing car-free or car-capped developments if its commitment in terms of car-free development is so strongly conditional. Real leadership would be shown by stronger language and more concrete intentions in a holistic and strategic approach to borough-wide sustainable transport and reducing dependence on the car.

Policy TR4K states that ‘development proposals for residential and commercial uses will be expected to investigate opportunities to implement rapid electric vehicle charging points, having regard to the Council’s Low Emissions Vehicle Charging Strategy’. Climate Action Lewisham does not support the uptake of electric vehicles (EV) as a panacea for the issues surrounding over-reliance on personal transport in urban and suburban areas. The environmental problems caused by widespread use of EVs are almost as negative as for petrol cars, in the energy-and-resource-intensive manufacture of EV batteries, and the problems of their end-of-life disposal. The brake dust generated by EVs contributes to PM2.5 particulates, which are the most dangerous for asthma sufferers, and they do nothing to alleviate congestion, parking pressure or safety. We urge Lewisham council to consider supporting them for essential vehicles only, such as ambulances, disabled transport, public transport and works transport and provide charging points for those vehicles, not for public use.

With a view to encouraging active travel and a small-business-based local economy, supporting last-mile delivery hubs (p460; 12.30) is an excellent idea, which will help congestion on suburban roads and encourage engagement with local businesses.