

Lee Neighbourhood Plan

Joint Statement of Common Ground

July 2023

Pre-examination stage of the Lee Neighbourhood Plan

1. General Information

- 1.1. This Statement of Common Ground (SoCG) has been prepared by the London Borough of Lewisham (LBL), Royal Borough of Greenwich (RBG) (the Councils) and the Lee Neighbourhood Forum (the Forum) to assist the Examiner at the Lee Neighbourhood Plan (the Plan) Examination by informing the Examiner of areas of agreement and disagreement between the Councils and the Forum.
- 1.2. The SoCG was prepared at the request of the Lee Neighbourhood Forum through a facilitation programme with Ann Skippers PPRPTI who was appointed by Locality as part of their Technical Support programme.

2. Background

- 2.1. During the Regulation 16 public consultation on the Lee Neighbourhood Plan, the councils both submitted detailed responses to the consultation providing suggested improvements, amended wording and an acknowledgment of whether the council supported the policy. Additionally, RBG clarified the council's position on whether the policy would meet the basic conditions at the examination stage. These comments are included in column 1 & 2 of the SoCG table(s) below.
- 2.2. As a result of the comments submitted by the councils the forum engaged with locality and requested a facilitation programme to be undertaken with the purpose of drafting a SoCG that would be submitted to the examiner as part of the examination.
- 2.3. The SoCG was drafted as a result of both virtual meetings attended by council officers, the forum chair and associated members of the neighbourhood forum and Ann Skippers who acted as an independent facilitator, and e-mail correspondence between the councils and the forum. Additionally, a meeting focusing on the site allocations was held with the forum and an LBL officer due to the site allocations being situated within Lewisham. Officers from Greenwich did not partake in this meeting. These meetings took place on:
 - Tuesday 4th April
 - Wednesday 10th May
 - Thursday 11th May (Site allocations)
- 2.4. The SoCG as presented in the table(s) below outlines an agreed position between the councils and the forum on the policies found in the Lee Neighbourhood Plan. Although an agreed common ground was found between the three parties on the majority of policies, there are still areas/policies where disagreement could not be resolved. In these instances, it has been agreed by the councils and the forum to allow the examiner to determine the soundness of the policy.
- 2.5. The SoCG is split into two tables:
 - Table A – SoCG on Lee Neighbourhood Plan planning policies
 - Table B – SoCG on Lee Neighbourhood Plan site allocations

3. Agreement of SoCG

Signed on behalf of Lewisham Council		
Name / Title	Signature	Date

Signed on behalf of Royal Borough of Greenwich		
Name / Title	Signature	Date

Signed on behalf of Lee Neighbourhood forum		
Name / Title	Signature	Date

Lee Neighbourhood Plan

Joint Statement of Common Ground

Table 1 – SoCG Planning Policies

July 2023

Pre-examination stage of the Lee Neighbourhood Plan

Section/Policy reference	Lewisham Response	Greenwich Response	Forum Response	Statement of common Ground
GB1: Protection and Enhancement of Green space	<p>A: The open spaces identified in Figure 5 are designated within the Lewisham Local Plan and are afforded protection against development as per policy Core Strategy Policy 12. this policy is replicating pre-existing policy. Is the intention here to uplift some of these designations to LGS to provide more protection?</p> <p>B: The Council supports this policy</p> <p>C: Through policy DM25 in the adopted Lewisham DMLPA and policy SD2 in the emerging draft Lewisham Local Plan it is already a requirement of major development to submit a landscape scheme or a sustainable design statement as part of the planning application. It is recommended that the specific threshold requirements be removed and replaced with “major development”</p> <p>D: The Council supports this policy</p>	<p>All Green spaces, regardless of designation (MOL, Community Open Space, Allotments etc) are treated in the same way by this Policy. There needs to be a distinction between the differing levels of protection.</p> <p>A - would allow development on MOL if there are public benefits. This would be contrary to RBG Policy OS2.</p> <p>C Policies for development do not fit well in a policy to protect open space! The RBG local validation list requirement to submit a landscaping strategy should be referenced here instead.</p> <p>As drafted, Policy GB1 does not meet the Basic Conditions (general conformity with the strategic policies).</p>	<p>Part A: No new designations for Green Spaces are being designated in this policy. We are happy to insert ‘this policy doesn’t apply to MOL’ as requested by RBG.</p> <p>Regarding replication of policy, during the development of the Plan, as a Forum we discussed at length whether to repeat policy where it repeated higher level policy. We decided that, given that the Local Plan is being replaced, that this policy reflects local consultation, and that local residents will read the neighbourhood plan more than the local plan (different audience) we would keep repeated policies in. We are happy to amend wording to make clearer.</p>	<p>A:-Councils recommend deletion of this part of the policy as it replicates higher level policy and does not add any issues of local significance. No new designations for Green Spaces are being designated in this policy. Forum recommend retaining the policy because of the local plans contexts but are happy to insert ‘this policy doesn’t apply to MOL’</p> <p>B: Councils and Forum are agreed on this policy.</p> <p>C: Councils and Forum are agreed that this policy should relate to Major Developments as defined in the glossary</p> <p>D: Councils and Forum are agreed on this policy.</p>
GB2 Achieving a Green Infrastructure – led development approach	<p>The threshold requirements should be removed and replaced with “major development”</p> <p>The Council considers the wording “demonstrate how it meets the following criteria” to be unreasonable and should be modified to reflect this.</p>	<p>As in 3.3 above, the threshold of 150sqm is arbitrary and inappropriate.</p> <p>The policy should be reworded to state “The scale of green infrastructure provision should be proportionate to the size of the scheme and seek to address the following criteria...”</p> <p>As drafted, Policy GB2 does not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies).</p>	<p>We would like to understand in what way the council considers it unreasonable. Please suggest preferred wording, for example should we clarify how they should do that eg by supplying a supporting statement?</p>	<p>Councils and Forum agree that a threshold is cited for a development of ‘major development’</p> <p>All parties agree the policy should be reworded as recommended by RBG to say: “The scale of green infrastructure provision should be proportionate to the size of the scheme and <i>seek to address the following criteria....</i>”</p>

<p>GB3 Designation of Nature Improvement Areas: River Quaggy Trail and Hither Green Nature Trail</p>	<p>It is unclear if the intention of this policy is to designate a Nature Improvement Area through this policy, or through a subsequent consultation with the community.</p> <p>It is recommended that this policy be reframed as a project catered around delivering the River Quaggy Trail and Hither Green Nature Trail.</p> <p>It is of the officers belief that a significant and robust evidence base would be needed to designate these areas as Nature Improvement Areas which is a national designation covering areas of 10,000-50,000 ha. A Local NIA can be designated by the Local Authority in partnership with the Forum, however should be achieved independently from the neighbourhood plan.</p>	<p>A – “Two Nature Improvement Areas are to be designated, in consultation with the local community” is not clear. Are the Nature Improvement Areas intended to be designated through this plan or through a subsequent consultation process?</p> <p>“the vicinity of the area” requires quantifying</p> <p>B – This is confusing, the policy states “will be designated” and “proposed trail”. Is this Policy designating the trail or flagging up a future project / community objective / aim of the Forum? Reference to SE London Green Chain Walk should be deleted as this is not within the control of the Forum or Councils.</p> <p>Criterion 2 – Reference to the Local Open Space Deficiency Area should be deleted. Improved access to the River Quaggy may not address this deficiency.</p> <p>Criterion 6 – “close to” needs to be quantified. “preserve / enhance” is terminology usually associated with the built environment.</p> <p>As drafted, Policy GB3 does not meet the Basic Conditions (having regard to national policies / general conformity with the strategic policies).</p>	<p>Reply to RBG:</p> <p>Part A: Yes they are being designated. We suggest removing ‘to be’</p> <p>Would RBG suggest appropriate planning language wording?</p> <p>Part B: The words are meant to add context (This could form an extension of the South East London Green Chain Walk). Is context permitted within planning policy?</p> <p>Criterion 2: We don’t understand this point. The trail would open up several metres of river banks space for several kilometres.</p> <p>Criterion 6: Would the word ‘bordering’ be satisfactory?</p> <p>Reply to LBL:</p> <p>Yes it is the intention to designate these areas as NIAs. Suggest change wording to make clear - say ‘two nature improvement areas are designated (not are to be designated).</p> <p>Please see evidence at the end of the policies and community consultation. If this is not considered enough evidence we suggest changing the name for example to ‘Areas of Nature Improvement’/’Nature Trail Enhancement Areas’</p> <p>What are the processes to go through to do that?</p>	<p>The Councils agree on the position that this is a project and not a policy and therefore should be deleted.</p> <p>The Councils believe that the designation of an NIA is not achievable through a neighbourhood plan and we would encourage the forum to explore the Local NIA program in partnership with the relevant stakeholders. The Councils have agreed to allow the examiner to determine the soundness of this policy.</p> <p>The contributions towards nature conservation from major developments in the vicinity of the trail could be elaborated on in a review of the plan if the trail is developed. Adjacent to would be more appropriate wording than ‘in the vicinity of’.</p> <p>The Forum would prefer to retain this as a policy, there is evidence to support the designation within the supporting documents to this plan and additionally listed at 4.1.7 of the neighbourhood plan.</p> <p>The Councils and the forum have agreed to let the examiner determine the soundness of this policy during the examination. Councils and Forum are agreed that, should the examiner consider this evidence to not warrant designation as an NIA, that an alternative designation be presented by the examiner.</p>
<p>GB4 Protection and Increase of Tree Cover</p>	<p>A: Neighbourhood plans cannot request or determine changes in the Council’s validation criteria regarding planning applications. All of the points within this policy are considered through the development management</p>	<p>A This is outside of the scope of a neighbourhood plan; a Neighbourhood Plan cannot include a Policy to set out what a Council should include in its validation criteria.</p> <p>In any case, it should be noted that the RBG Local Validations list requires a tree</p>	<p>A: We suggest that the wording is changed to say ‘where relevant, every planning application must ensure that:’?</p> <p>Part 4B: We agree to the removal of this if it is not within the remit of planning policy</p>	<p>The Forum and Councils are agreed that the examiner should decide the soundness of this policy</p>

	<p>process and covered by existing London Plan, Local Plan Policies and reflected in the emerging draft Local Plan.</p> <p>B: The Council supports the intention of the plan to protect canopy and tree cover within the neighbourhood area, however protections cannot be provided to trees purely on their age or maturity. There are significant protections for trees covered by TPOs and conservation areas.</p> <p>B: Any tree covered by a TPO or situated within a conservation area is subject to a tree application as assessed by the Council's tree officer and is required to be replaced by an appropriate species as determined through the permission if granted. The tree protection does not cover "mature" trees that are not subject to protection through a TPO or conservation area.</p> <p>Part 4B of the policy should be removed and included in the recommended further actions section</p>	<p>survey / arboriculture report to be submitted with any application where there are trees within the application site or on land adjacent that would be affected by the development (including street trees). The Council's tree officer would be consulted on relevant applications by the case officer, and may be involved in pre-application discussions, but it is not appropriate for applicants to be required to consult tree officers prior to submission of an application in order for an application to be considered to be valid. The Lee Forum can respond to the consultation on a planning application but a developer would not be required to consult them in advance of submission of a planning application, although the council encourages early engagement by developers with communities at an early stage in the process.</p> <p>B 'Mature trees' is open to interpretation, however, trees would not be afforded protection purely due to their age. RBG Policy OSF iii acknowledges the importance of tree retention, however this will not be feasible in every situation. Trees with TPO's are provided greater protection and the council would resist removal.</p> <p>B4 is not a planning issue and cannot be required.</p>		
GB5 Managing Flood Risk	<p>A: Applicants for major development are required to submit a Flood Risk Assessment summarising how a reduction on flood risk will be delivered. This is replicating existing policy.</p> <p>B: The Council supports this policy in line with emerging Local Plan policy SD8. It</p>	<p>B – It is unreasonable to expect demonstration that SuDS can be accommodated on all outline applications. The expectation of what SuDS should achieve in this policy is too specific. The Council's Local Validation list requires details of SuDs on all major applications; and on developments on land over 0.25ha in area and in areas identified in the Royal Borough's Surface Water Management Plan. The</p>	<p>A: Regarding replication of policy, during the development of the Plan, as a Forum we discussed at length whether to repeat policy where it repeated higher level policy. We decided that, given that the Local Plan is being replaced, that this policy reflects local consultation, and that local residents will read the neighbourhood plan more than the local plan (different audience) we would keep repeated</p>	<p>The Forum and Councils are agreed that the examiner should decide the soundness of this policy</p> <p>Part A: Council and forum agree that Major development threshold be added to part A of the policy with recommended wording: "All <i>major</i> development in or adjacent to..."</p> <p>Part B: The Councils and Forum agree to include the wording 'Sustainable Drainage Systems should be integrated into major development proposals wherever possible. SUDs should achieve green field run off rates to ensure that water runoff is managed as close to the source as possible'.</p> <p>C: Councils and Forum agree on this Policy</p>

	<p>would be worth reinforcing in the policy that the any SuDs should achieve green field run off rates to ensure that water runoff is managed as close to the source as possible.</p> <p>C: The council supports this policy</p> <p>D: This policy should be re-worded to “Where planning permission is required the paving over of front gardens will not be supported”</p>	<p>London Sustainable Drainage Proforma sets a clear standard for the information that should be provided in a Sustainable Drainage Strategy.</p> <p>As drafted, Policy GB5 does not meet the Basic Conditions (general conformity with the strategic policies).</p>	<p>policies in. We are happy to amend wording to make clearer.</p> <p>We are happy to write that A only applies to major developments</p> <p>B: We request that the Councils provide this wording.</p> <p>D: Agreed</p>	<p>D: Councils and Forum are agreed to include the wording ‘Where planning permission is required the paving over of front gardens will not be supported”</p>
<p>GB6 Protection and Enhancement of Lee’s Playing Fields</p>	<p>This policy is replicating Sport England’s national policy regarding no net loss of playing fields.</p>	<p>The Sport England Playing Fields Policy and Guidance sets out exceptions where they will not oppose development on playing fields, or land previously used as playing fields. RBG Core Strategy Policy OS (d) also sets out exceptions. This Policy should also set out the exceptions, in order to align. However, there is a question as to whether this policy is needed if it is duplicating Local Plan Policy.</p> <p>As drafted, Policy GB6 does not meet the Basic Conditions (general conformity with the strategic policies).</p>	<p>The policy as drafted states that it is ‘in line with Sport England policy guidance’ – we suggest we amend to say. ‘This policy to be applied in conjunction with Sport England and RBG policy’</p> <p>Regarding replication of policy, during the development of the Plan, as a Forum we discussed at length whether to repeat policy where it repeated higher level policy. We decided that, given that the Local Plan is being replaced, that this policy reflects local consultation, and that local residents will read the neighbourhood plan more than the local plan (different audience) we would keep repeated policies in. We are happy to amend wording to make clearer.</p>	<p>Council and forum agree that this is replication of Sport England policy and suggest that the exceptions within the Sport England Policy and Guidance should be listed.</p>
<p>TC1 Protect, Promote and Enhance Public Transport</p>	<p>A: The Council in principle supports this policy however a neighbourhood plan does not have the ability to propose the creation of new bus routes or the enhancement of existing bus routes. This will be determined by TFL in partnership with Lewisham Council. The policy is however supported by the</p>	<p>A – Improvements to bus / train services are not within the control of a Local Authority. CIL contributions could be used towards new or enhanced public transport if appropriate.</p> <p>B – The threshold of the size of development to which this Policy applies should be clarified. It is important to consider when these requirements are reasonable and proportionate. The RBG Local validation</p>	<p>We suggest moving reference to specific routes to recommended actions.</p>	<p>A: Councils and Forum agreed keep the first line of the policy but recommend removing the reference to which bus routes should be prioritised for improvement. The removal of provision of cycle hire facilities also be recommended for removal and added to recommended actions.</p> <p>B: Councils and Forum are agreed that this policy should relate to Major Developments as defined in the glossary</p>

	<p>emerging Lewisham Local Plan TR1B which states that “ Development proposals must aim to improve and not adversely impact on the effective function and safe use of Lewisham’s transport network and public realm”</p> <p>B: Similarly this is supported by Lewisham Core Strategy policy 14 and policy TR1F-I in the emerging Lewisham Local Plan where development will need to demonstrate that it will not adversely impact on the function of Lewisham’s transport network. The size of the development should be clarified within the policy.</p>	<p>list requires transport assessments on residential applications of more than 50 units, major commercial applications (>1000sqm) and major applications for commercial development (including retail); and all applications for schools and nurseries, hospitals, places of worship and others where the proposed development would have significant transport implications. Transport Statements are required for residential schemes of 10-50 units and all applications where traffic and travel implications will be increased.</p> <p>Policy TC1 does not meet the Basic Conditions ((having regard to national policies / achievement of sustainable development).</p>		
<p>TC2 Improve Measures to Reduce pollution Levels</p>	<p>The Council generally supports this policy however there should be a threshold of the size of development that this applies policy applies to.</p> <p>Much of this policy is covered by existing London Plan (Policy SI 1) Lewisham Local Plan (Policy DM 23) as well as the emerging draft Local Plan (Policy SD6).</p> <p>3: Parking standards are set by the London Plan and the Local and Neighbourhood Plan will conform to these standards. It is also unreasonable to expect that all major schemes will provide underground parking and should be considered on a case by case basis.</p>	<p>The threshold of the size of development to which this Policy applies should be clarified. It is important to consider when these requirements are reasonable and proportionate. Policy could make reference to the validation requirement to provide an air quality assessment.</p> <p>3 Provision of off-street parking does not discourage private vehicle use. Parking provision should be considered in line with the London Plan’s maximum parking standards depending on the PTAL score of the site. It may not be appropriate for any off-street parking to be provided. Furthermore, there is little justification for requiring basement parking on all major schemes. This should be considered from a design perspective on individual developments rather than covered by a blanket statement. The purpose of the statement ‘ Developers will make best efforts to ensure delivery of suitable public transport solutions to population increases’ should be deleted. This is a strategic issue, not to be addressed on a</p>	<p>We would be happy to consider the ‘major development’ threshold</p> <p>The Forum are aware that other plans have set parking standards so consider the wording of this policy around parking to be appropriate</p> <p>Regarding replication of policy, during the development of the Plan, as a Forum we discussed at length whether to repeat policy where it repeated higher level policy. We decided that, given that the Lewisham Local Plan is being replaced, that this policy reflects local consultation, and that local residents will read the neighbourhood plan more than the local plan (different audience) we would keep repeated policies in. We are happy to amend wording to make clearer.</p> <p>Regarding underground parking we would consider changing the word ‘should’ to ‘should be considered’</p>	<p>Councils and Forum are agreed that this policy should relate to Major Developments as defined in the glossary</p> <p>TC2(3): The Councils and Forum agree that underground parking facilities should be agreed on a case-by-case basis by replacing the word ‘should’ with ‘should be considered’.</p>

		<p>site –by site basis through Neighbourhood Plan Policy.</p> <p>There is an overlap between the requirements of this Policy and improvements to the area that could be sought through S106/CIL.</p> <p>Policy TC2 does not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies).</p>		
TC3 Improve Active Travel Options and Road Safety Measures in the Forum Area	<p>Rename to TC3 in the Policy Index</p> <p>Much of this policy is covered by existing London Plan (Policy T2) Lewisham Local Plan (Policy CS14) as well as the emerging draft Local Plan (Policy TR3).</p> <p>The Council supports the principle of this policy and the encouragement of active travel options and improving Road safety, however there needs to be a realistic threshold of size of development. The impact on the capacity or provision of road infrastructure could be as little as one residential unit and would therefore be unreasonable for the applicant to address all of the considerations outlined below.</p> <p>It is requested that the inclusion of French style crossing and their reason for being cheaper be removed. All crossing must comply with UK regulation.</p>	<p>Proposals impacting on capacity or provision of road infrastructure could be just one residential unit. The effect of this policy would then mean that any new house being built in the plan area would have to address all of the considerations that would be considered unreasonable. The developments to which this Policy applies should be defined; requirements on development has to be proportionate to the scale of development. Reference to a need for a Transport Impact Assessment should be added.</p> <p>The ‘positive contribution to the Mayor’s Healthy Streets Approach’ is not something that can easily be assessed.</p> <p>Provision of parking spaces for different types of development will be subject to the London Plan maximum parking standards. It may therefore not always be appropriate to provide parking for shops, depending on the site’s location and size.</p> <p>Depending on the size of individual proposals, many of the clauses here may not be applicable to the grant of planning permission and are more appropriately addressed under the council’s capacity as highway authority. It should be made clear that these may</p>	<p>TC3(2): We would prefer to keep traffic islands as this is the cheapest most effective way to reduce speed; we think it policy and would prefer to keep it but can be flexible on wording.</p> <p>TC3(4): Regarding point 4, parking for shops, local businesses made strong representations about this we would prefer this to remain and let the examiner determine if it should be removed, We would prefer this to remain and let the examiner determine if it should be removed</p> <p>Regarding replication of policy, during the development of the Plan, as a Forum we discussed at length whether to repeat policy where it repeated higher level policy. We decided that, given that the Lewisham Local Plan is being replaced, that this policy reflects local consultation, and that local residents will read the neighbourhood plan more than the local plan (different audience) we would keep repeated policies in. We are happy to amend wording to make clearer.</p>	<p>Councils and Forum agree on threshold of major development as defined in the glossary for all parts of this policy as it would be considered unreasonable and onerous for developments that sit under the major development threshold to meet the requirements set out in this policy.</p> <p>TC3(1): Councils and Forum agreed to removal of the wording French style crossing. National requirements for road crossing should be used.</p> <p>TC3(2): Councils and Forum agree regarding traffic islands, that any road improvements would be undertaken and assessed on a case-by-case basis and so the wording ‘where appropriate’ should be inserted</p> <p>TC3(4): Councils and Forum agree to leave it to the examiner to determine the acceptability of point 4 regarding parking for shops.</p> <p>TC3(9) Councils and Forum agree to leave it to the examiner to decide re cycle storage</p>

	<p>Similarly the provision of small traffic islands to reduce road width where it is 9 metres kerb to kerb will be subject to the relevant assessment process to determine whether or not it is appropriate</p> <p>9. Cycle storage provision is a project and not a policy. This could be added as a priority for Neighbourhood CIL spend.</p> <p>Although the Council supports increasing electric charging ports within the borough, this point would not reduce the road use from motor vehicles</p>	<p>only apply where the comprehensive redevelopment of a large site is being proposed.</p> <p>There is an overlap between the requirements of this Policy and improvements to the area that could be sought through S106/CIL. For example, clause 9 would be unlikely to be secured via planning condition or S106 planning obligation where it does not directly relate to the individual development concerned.</p> <p>The provision of electric charging points would not reduce the reliance on motor vehicles and should be separated from this clause (9 ii).</p> <p>1 Delete reference to 'French style crossings'. These are not currently permitted on UK roads.</p> <p>Policy TC3 does not meet the Basic Conditions (having regard to national policies / achievement of sustainable development).</p>		
<p>BHA1 Protection, Enhancement and Provision of Community Buildings</p>	<p>A: The Council supports this policy however some modifications are recommended</p> <ol style="list-style-type: none"> 1. Include a defined timeframe for how long is considered reasonable for "efforts to be made to increase utilisation" 2. No comment 3. This is confusing, is this policy presuming that new community space will be achieved through new development? <p>C: Provision for community space will be secured through s106 agreement with the developer and a suitable alternative can be</p>	<p>A – 1. Requiring a space to be both under-utilised <i>and</i> no longer serving the community is considered excessive. Under-utilisation could be a consideration in determining whether the use continues to serve the community. The phrase 'efforts have been made' is open to interpretation. A time period needs to be defined. 3. Is unclear, any development where a community building is lost would lead to a net loss of overall community space. A reworded criterion 1 together with criterion 2 should suffice</p> <p>C- Is there an evidence base which identifies local needs? Such improvements to the area would normally be sought through S106/CIL contributions where applicable. It is not considered necessary to have further policy to ensure such contributions are made. The threshold requires reconsideration and should be aligned</p>	<p>A: Is there a time scale in council's policy that we can replicate? If not we suggest 12-18 months</p> <p>D: We came to this definition since we faced the difficulty of Greenwich and Lewisham having differing definitions, so if we used one Councils definitions we did not fit the definition of the other - we felt it best to have a definition that covered both – we would be happy to identify them in a glossary or map for example</p>	<p>A: Councils and Forum agree that an 18 month timescale is reasonable for this policy.</p> <ol style="list-style-type: none"> (1) Councils and Forum agree the definition of under-utilised is that efforts have been made to increase utilisation over an 18 month period, and or the use no longer serves the needs of the community. (2) Council and Forum agree on this policy (3) Councils and Forum agree to leave it to the examiner to determine the soundness of this policy <p>C: Councils and Forum are agreed to remove the reference to Leigate and add instead a threshold of 'major development' as defined in the appendix</p> <p>D: Councils and Forum agree that the plan can use the Forums own terminology within the policy wording as long as the policy points to a glossary which highlights both Councils formal designations. (link to retail and economy map which shows hubs)</p>

	<p>agreed through this mechanism. The Council requests that the reference to Leegate centre be removed from this section.</p> <p>D: Local Retail and Economy Hubs are not a recognised designation and should be replaced with a formal designation as recognised through planning policy such as District Centres, Local Centres and Local Parades. There needs to be more clarity on where would be the most appropriate location for a particular type of community facility.</p>	<p>to existing Local Plan policy if retained. Delete reference to Leegate Centre as this is confusing.</p> <p>D Clarify ' local retail and economy hubs' which are not currently defined. It would be better to refer to designated local centres here. If community buildings or facilities are those limited to the types of facility listed in the table above the policy, provision would be generally appropriate in local centres (with the possible exception of sports clubs); however, if other types of facility (e.g. nurseries, doctors surgeries) are encompassed by this policy, other more residential locations may be appropriate. There is a lack of clarity over whether the policy is supposed to incorporate other types of facility and if so, what criteria could be considered for alternative locations outside of designated centres.</p> <p>Policy BHA1 does not meet the Basic Conditions (having regard to national policies /general conformity with strategic policies / achievement of sustainable development).</p>		
<p>BHA2 Protection, Enhancement and Provision of Social Infrastructure</p>	<p>Although the Council understands the principle of this policy the identification of essential infrastructure is undertaken through the Local Plan process within the Infrastructure Delivery Plan which assesses future infrastructure need against projected population growth. S106/CIL is then used to fund these projects. This is further supplemented by all major development undertaken a series of assessments which aid the negotiation of S106 requirements. As this is a strategic issue we do not believe the neighbourhood</p>	<p>An assessment of the existing and future infrastructure requirements to support population growth is prepared by the Local Authority in collaboration with infrastructure providers and published in an Infrastructure Delivery Plan (IDP). The council's latest IDP was published in 2021 and is available on the council's website. Any identified infrastructure is then secured through S106, CIL or other wider funding sources. Social infrastructure should be strategically planned, not required on development sites on an adhoc basis.</p> <p>Policy BHA2 does not meet the Basic Conditions (having regard to national policies /general conformity with strategic policies / achievement of sustainable development).</p>	<p>Our understanding is that NPs can deliver infrastructure that can include social infrastructure per Planning Policy Guidance:</p> <p>From Planning Practice Guidance (PPG)</p> <p>"Should a neighbourhood plan consider infrastructure? A qualifying body may wish to consider what infrastructure needs to be provided in their neighbourhood area from the earliest stages of plan-making (as set out in paragraph 102 of the National Planning Policy Framework) alongside development</p>	<p>The Councils and Forum are to allow the examiner to determine the soundness of this policy.</p>

	<p>plan does not have the scope to deliver “social infrastructure”.</p>		<p>such as homes, shops or offices. Infrastructure is needed to support development and ensure that a neighbourhood can grow in a sustainable way. The following may be important considerations for a qualifying body to consider when addressing infrastructure in a neighbourhood plan:</p> <ul style="list-style-type: none"> ☐ what additional infrastructure may be needed to enable development proposed in a neighbourhood plan to be delivered in a sustainable way ☐ how any additional infrastructure requirements might be delivered ☐ what impact the infrastructure requirements may have on the viability of a proposal in a draft neighbourhood plan and therefore its delivery ☐ what are the likely impacts of proposed site allocation options or policies on physical infrastructure and on the capacity of existing services, which could help shape decisions on the best site choices <p>Qualifying bodies should engage infrastructure providers (eg utility companies, transport infrastructure providers and local health commissioners) in this process, advised by the local planning authority.</p> <p>Paragraph: 045 Reference ID: 41-045-20190509 Revision date: 09 05 2019 See previous version</p> <p>What should a qualifying body do if it identifies a need for new or enhanced infrastructure?</p> <p>A qualifying body should set out and explain in their draft neighbourhood plan the prioritised infrastructure required to address the demands of the</p>	
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			<p>development identified in the plan.” Paragraph: 046 Reference ID: 41-046-20140306 Revision date: 06 03 2014</p> <p>We could consider changing the wording to ‘local infrastructure’</p>	
BHA3 Enhancement of Public Realm Facilities	<p>The public realm improvements discussed in this policy are more likely to be delivered through the Neighbourhood CIL program or similar council grant programs. It is recommended that the outcomes that this policy wishes to achieve be considered as an NCIL priority rather than a policy.</p>	<p>The projects in this policy could be delivered through CIL or other funding sources.</p> <p>C – the provision of litter bins is likely to be permitted development if considered development at all and this clause should be removed.</p> <p>D – The provision of street lighting in most cases is covered by highways rather than planning powers and would not be considered as part of a planning application unless comprehensive redevelopment was proposed. Furthermore, not all lights will be in correct location for electric vehicle charging. Suggest amending to ‘where appropriate’.</p>	<p>The Forum are willing to be less prescriptive and make it less detailed such as ‘public realm facilities including xxxx (as examples)</p>	<p>Councils and Forum agree that this policy should apply to major developments to be defined in the appendix</p> <p>Councils and Forum agree to retain a more generalised public realm policy and that the specific improvements be moved to a recommended list of projects as Councils feel this could add more weight to their delivery.</p>
BHA4 Housing Delivery	<p>A – Although this policy generally replicates London Plan and Local Plan policies it is less robust than both higher level policy documents. .</p> <p>A1: The policy should use recognised terminology such as affordable housing as found in Policy 3.10 of the London Plan. The wording of the policy is also confusing and should be modified. The strategic target of affordable housing in the London Plan policy H4 is 50%. It is recommended that the wording “at least minimum viable” is removed.</p>	<p>A1 – ‘Social housing’ should be changed to ‘affordable housing’ to reflect the terminology used widely in other Plans and the NPPF.</p> <p>A3 – Is there an evidence base of local need A4 This would be delivered through CIL etc and should not be included here.</p> <p>Policy BHA4 does not meet the Basic Conditions (having regard to national policies /general conformity with strategic policies)</p>	<p>Regarding replication of policy, during the development of the Plan, as a Forum we discussed at length whether to repeat policy where it repeated higher level policy. We decided that, given that the Local Plan is being replaced, that this policy reflects local consultation, and that local residents will read the neighbourhood plan more than the local plan (different audience) we would keep repeated policies in. We are happy to amend wording to make clearer.</p> <p>BHA4 A(1): We are happy to define social housing</p> <p>BHA4 A(3): We assume councils prepare evidence of local need borough wide and would be happy to reference</p>	<p>The Councils and Forum agree that ‘residential development of 10 units or more’ be replaced with ‘major development’ as defined in the appendix</p> <p>BHA4 A(1): Councils and Forum agree that recognised terminology for housing as found in London Plan Policy 3.10 be used.</p> <p>BHA4 A(4): the Councils and Forum agree that should be deleted as it does not relate to housing policy.</p> <p>BHA4 A(5): the words ‘and the Area Design Guidance at appendix x’ should be added to the end of this policy</p>

	<p>A4: As noted in policy BAH2 anything that the plan considers to be social infrastructure will be delivered through the identified need realised in the Infrastructure Delivery Plan and funded through s106/CIL developer contributions.</p> <p>A5: This part of the policy is replicating a pre-existing mechanism regarding design scrutiny and can be removed.</p>		BHA4 A(4): See above re Infrastructure and Neighbourhood Plans.	
BHA5 windfall Sites	<p>What is the definition of underused within this policy? Who would define a particular site as being underused? Regardless of how well a site is or isn't used, it can still be identified as a small site/windfall site used for development.</p>	<p>A site should not necessarily have to demonstrate it is underused before being brought forward for development. This will depend on the existing use of the site and should be determined on a case-by-case basis in accordance with other development plan policies. This clause would benefit from re-wording to make clear that use of under-used sites is welcomed, but not a condition of bringing a site forward for redevelopment.</p> <p>Policy BHA5 does not meet the Basic Conditions (achievement of sustainable development / general conformity with strategic policies).</p>	<p>We would be happy to define it somewhere 'land that is not being used efficiently' or 'land is underutilised'</p>	<p>Councils and Forum agree that policy should be amended to include the word 'particularly' here: 'The development of sites which are not allocated for housing will be supported, <u>particularly</u> where...'</p>
BHA6 Design of New Development	<p>This policy as written is confusing as it tries to combine a number of disparate topics. We would recommend that this policy be removed from the plan.</p>	<p>The threshold of the size of development to which the parts of this Policy apply should be clarified., particularly A3 as Energy efficiency standards vary according to scale of development in the London Plan. (update ref to London Plan). The phrase 'environmentally conscious design' is also unclear. It would be better to refer to high standards of sustainability or similar, e.g. highly sustainable design.</p> <p>Policy BHA6 does not meet the Basic Conditions (achievement of sustainable development / general conformity with strategic policies).</p>	<p>We would be happy to say that major developments will be required, and other developments will be encouraged</p>	<p>A: Councils and Forum agree that the policy in part A should be amended by removing 'environmentally conscious design' and replace with 'high standards of sustainability'.</p> <p>A: The Councils and Forum agree to change 'all new developments will be required to' to 'major developments will be required, and other developments will be encouraged to'</p>

<p>RLE1 Maintain, Improve and Sustain Diversity, Vitality and Viability of Retail Sites</p>	<p>A: The council requests that the wording “proposals should” be amended to “proposals that require planning permission will be supported”</p> <p>Part 1 - Due to permitted development rights relating to changes in use class of town centre uses as defined in the NPPF this policy as written could not be implemented as policy cannot control as retail has a use class of E, any other use within the E use class can be achieved through permitted development rights.</p> <p>Lewisham Council through Mayor and Cabinet have approved a non-immediate Article 4 Direction that removes permitted development rights for the change of use from Use Class E to Residential Use Class C3.</p> <p>B: It is requested that the text “will be resisted” be amended to “will not be supported”</p>	<p>‘Employment’ ‘socio-cultural’ and ‘leisure’ should be defined as these terms are open to interpretation. Reference to the Use Classes Order would be more appropriate, particularly Classes E and F. It is important to recognise that retail falls within Use Class E, and that planning policy cannot control the loss of existing retail use where the change is to another use within Class E.</p>	<p>Reply to RBG:</p> <p>We could use dictionary definition or an alternative planning term if RBG prefer please advise</p>	<p>A: The Councils and Forum agree that the wording “proposals should” be amended to “proposals that require planning permission will be supported if”</p> <p>B: Councils and Forum are agreed to amend the wording of this policy from “resisted” to “will not be supported” in continuity of the plan.</p>
<p>RLE2 Improve Shopfronts and Advertising in Retail Spaces</p>	<p>A: The Council supports this policy and would like to see a more considered approach to shop front design as a whole, the policy needs to recognise that some aspects of shop front design will not need planning permission if the shop sits outside of a conservation area or is not part of a listed building.</p>	<p>Whilst we agree with the principles of this policy, it is important to note that many changes to shopfronts will not require planning permission (e.g. installation of internal security shutters).</p> <p>Clause B is not needed. Adverts and signage usually fall under the advert regulations for determination, which only assess the impact on public safety and amenity. Some advertisements do not require consent.</p>	<p>We understand that this is a complicated area – shop fronts versus signage but would be happy to add ‘where planning permission is required’</p>	<p>A & B: Councils and Forum agree that “where planning permission is required” to be added at the start of the policy for both A and B</p>
<p>RLE3 Improve and Enhance the Public Realm of</p>	<p>The policy is too prescriptive and onerous and will not be deliverable for every development that meets the required policy threshold.</p>	<p>Reference to retail/cultural activity sites would be better rephrased to retail centres, to reflect existing Local Plan designations.</p>	<p>Reply to RBG:</p> <p>Lewisham and RBG have different definitions for retail and cultural areas so we are unable to match both of</p>	<p>Councils and Forum agree that the title of the policy be shortened to “improve public realm”</p> <p>A: The Councils and Forum agree that ‘developments of 10 residential units or 150 sq metres’ be replaced with ‘major development’ as defined in the appendix</p>

Retail/Cultural Activity Sites	The wording should include “where appropriate” or “should aim to” to allow a degree of flexibility.	As in 3.3 above, the threshold of 150sqm is arbitrary and inappropriate. It is difficult to imagine how a small retail site of 150sqm could meet all of the criteria set out as it may in practice have little to no public realm. The policy is more appropriate for major development affecting the public realm. Furthermore, there could be an overlap between the requirements of this Policy and improvements to the area that could be sought through S106/CIL. Suggest reword to “proposals in respect of retail centres should where possible, aim to ...” otherwise the Policy, particularly Criterion 4, is too onerous. The reference to 10 residential units appears inappropriate here, including it indicates that residential use is appropriate in retail locations, which may not always be the case. Policy RLE3 does not meet the Basic Conditions (achievement of sustainable development / general conformity with strategic policies).	them. We have defined what the terms we have used mean in the plan. We prefer that ‘where possible is not used, but could add ‘major development’ Reply to LBL: We understand where the council is coming from, but suggest that we leave the wording as it is and see what the examiner says.	A4: Councils and Forum agreed to remove -specific place names in RLE3A4 and replace with ‘particularly in the retail centres found in fig 12 ‘
RLE4 Protect and Encourage Local Employment Sites	A. The Council supports this policy and its commitment to protecting and enhancing the land use of LEL sites, the plan is unable to secure property for a specific type of business or occupant. B. The wording in this policy needs to be modified to delete the word permitted and replace with “will be supported”. The use class B1c listed in part C and D of this policy are no longer considered and instead should be replaced by use class E as referred to in the new Use Classes Order in England which came into place in September 2020	It is unclear whether the entire Policy only applies to existing Local Employment Sites identified in Table 5, this needs to be clarified A – Planning can secure / protect land for a particular use but cannot reserve it for a particular business or occupier. C&D – Reference to use class B1c is no longer appropriate as this now falls within new use class E Policy RLE3 does not meet the Basic Conditions (achievement of sustainable development / having regard to national policies).	A: We understand where councils are coming from, but would prefer to keep in as it was one of the highest community feedback points received. We suggest that we leave the wording as it is and see what the examiner says there was much community feedback about supporting local businesses.	A: The Councils and Forum agree that proposals for regeneration should protect existing business uses and efforts made to reinstate local employment opportunities B: Councils and Forum agreed to replace “resisted” should be removed and replaced with “will not be supported” C&D: In policies RLE4C and RLE4D Councils and Forum agreed to change reference to B1c/B2 to class E(g)
RLE5 Revitalise Lee Green	A: The text “proposals should” should be amended	A – amend policy to say ‘where possible / where appropriate’ as some criteria will not be valid for all schemes.	A: We suggest that it applies to ‘major development’ as this is a defined term	A : Councils and Forum agreed to replace ‘should’ with “proposals will be supported” at the end of the policy and that it be clarified to apply to ‘major developments’ as defined in the appendix

District Town Centre	<p>to “proposals will be supported if encourage to”</p> <p>B: The Neighbourhood Plan is unable to set the requirement for the production of a masterplan through planning policy. It is recommended that this be removed from the policy section and included as a project. It also needs to be clear who will be responsible for the delivery of the master plan.</p>	<p>B – It is not clear who is to prepare the Masterplan? Further actions listed in para 4.4.6 suggest that this will be for the Forum and the Boroughs, but the Neighbourhood Plan cannot tell the Councils to prepare a document, this is for the LA’s to determine. It is not clear if numbered criteria 1-9 are policy or suggested future content for a proposed Masterplan. Suggest deleting RLE5B in its entirety or moving from policy to the recommendations section of the chapter or to the ‘Priority Projects’ section. If retained it needs to be clearly reworded and the opportunity taken to update the references to use classes to reflect new class E.</p> <p>Policy RLE5 does not meet the Basic Conditions (achievement of sustainable development / having regard to national policies).</p>	<p>B: Either Councils or Lee Forum, or all together, could masterplan. This policy is not requiring anyone to prepare a masterplan, but is intended to be a reminder that one is needed, given that Lee Green town centre is divided between 2 Councils and three wards.</p>	<p>B: The Councils and Forum are agreed to remove the current wording of RLE5B and to include it instead in priority project section 6. The Councils and Forum also agree that the wording of RLE5B be instead ‘the development of a masterplan is strongly encouraged’</p>
HD1 Designation, conservation and Enhancement of Heritage Assets	<p>National and Local Policy that protects heritage assets and conservation areas is already well established and therefore does not need to be replicated within neighbourhood planning policy. It is worth noting that non designated heritage assets are not afforded the same protections as designated heritage assets at a local and national level.</p>	<p>While non-designated heritage assets can be identified through the neighbourhood plan making process, the Planning Practice Guidance for the Historic Environment is clear that decisions to identify non-designated heritage assets must be based on sound evidence. Historic England further advises that there should be a consistent and accountable approach to the identification and management of local heritage assets, selected by uniform criteria.</p> <p>Figure 14 shows ‘proposed conservation areas’ and Figure 13 (in a previous section of the plan) shows ‘heritage buildings of townscape merit – to be protected’. It is not clear if these are intended to be ‘non-designated heritage assets’. If they are, they need to be clearly identified as such, with a list of addresses in an appendix to the Plan. Robust justification would need to be provided, including evidence of consultation with land owners. The ‘heritage and character assessment’ evidence report, lists buildings</p>	<p>The neighbourhood plan is not intended to identify non designated assets. By ‘non-designated assets’ the Forum means ‘locally listed assets’.</p> <p>Figure 14 references proposed conservation areas which are detailed further in ‘recommended further actions’ at the end of the Heritage and Design section of the neighbourhood plan. It is illustrative, and is not intended to designate conservation areas which we appreciate cannot be designated through a neighbourhood plan</p> <p>Figure 13 We aren’t seeking to designate new assets with this map. These are buildings which we plan to include in an application for a conservation areas outside of the neighbourhood plan process.</p>	<p>The Councils and the forum agree that the Plan needs to clarify that ‘non designated heritage assets’ are those on the Councils’ local lists only. This could be within the Policy, or in the glossary.</p> <p>The Councils and Forum agree that HD1A1 should be amended to say ‘Protect, conserve or enhance the architectural authenticity <u>significance</u> of heritage assets.....’</p>

		<p>identified as being of heritage interest during a 'site walkover'. It is not clear if, or how, this list of buildings relates to the proposed conservation areas or heritage buildings of townscape interest, but it is not considered to be sufficient evidence for to justify identification as 'non designated heritage assets'.</p> <p>Reference to 'Non designated heritage assets' in this Policy requires clarification; it should be clear that such buildings are those on the Councils' local list only. There is concern that this Policy could be misinterpreted as applying to areas shown as 'heritage buildings of townscape merit' or to 'proposed conservation areas'</p> <p>A1 – The phrase 'architectural authenticity' is not consistent with the NPPF tests when referring to heritage assets. It would be better to refer to 'interest', 'quality' or 'significance' here.</p> <p>It is important to note that many 'public realm heritage features' can be removed without planning consent. It would be useful to identify a list of these features and their locations, in line with the principles of identifying non-designated heritage assets above. Policy HD1 does not</p>		
HD2 Design and Scale of New Development	<p>A design and access statement is required to be submitted as part of the validation for all major developments in Lewisham and should be proportionate to the scale of the development.</p> <p>A3: The text "new development will be required to" should be amended to "new development will be supported or aim to". Also front walls do not need planning permission if they</p>	<p>The policy should reference the need to submit a Design and Access Statement, the RBG Local validations List requires this for major developments and the level of detail should be proportionate to the development proposal.</p> <p>A3 – front walls can be permitted development up to 1m and existing walls above 1m can often be rebuilt under permitted development. This should therefore be removed or altered accordingly.</p> <p>C2 – references to Lifetime Homes standards should be removed as these are no longer applicable. Accessibility</p>	<p>We would be happy to clarify with 'where planning permission is required'</p> <p>Regarding A3 we would prefer to keep as 'should demonstrate' as its stronger – we could clarify that it should demonstrate with a supporting statement</p>	<p>HD2 The council and Forum are agreed to add a reference to the need to submit a design and access statement as required through both Lewisham's and Greenwich's validation lists for major developments.</p> <p>A3: The Councils and Forum are happy with the amendment to this policy which adds "where planning permission is required" to the end of this policy</p> <p>C2: Councils and Forum agree that the Lifetime Homes Standard be removed and replaced with the correct terminology from London Plan D7 which is now 'Accessible Housing'.</p> <p>Councils and Forum agree that ' designs for new development should demonstrate ' be replaced with 'designs for new developments will be supported where....'</p>

	<p>are of a height of 1m or less so this section should be removed.</p> <p>C: Lifetime Homes Standard is no longer in place, correct terminology, London Plan Policy D7 Accessible Housing should be used as a replacement. .</p> <p>The text for this section should also be amended “should demonstrate” to “will be supported”</p>	<p>standards are now controlled through Building Regulations.</p>		
<p>HD3 Extensions, Alterations and New Buildings</p>	<p>It is recommended that this policy references the Lewisham Extensions and Alterations SPD. A1 – the council does not support this statement – there are many occasions where an extension or alteration of contemporary, contrasting palette of materials is an appropriate solution. Planning policies should not prescribe architectural style.</p> <p>A3 – this may not be required unless the property is identified as a heritage asset and/or in a conservation area.</p> <p>What is the status of the design guide and how does it interact with established SPDs such as the Extensions and Alterations SPD and Small Sites SPD? Much of opportunities outlined within the design guide in areas that are not Conservation Areas may not be enforceable as small extensions, alterations and front boundary treatments will fall under permitted development. Where</p>	<p>This policy is too prescriptive in favour of a traditional architectural approach, non-traditional proposals which provide a high quality outcome may be considered appropriate.</p> <p>Policy HD3 does not meet the Basic Conditions (general conformity with strategic policies).</p>	<p>We believe the following sections of the plan address the council’s concerns:</p> <p>5.1. Area Design Guidance Site specific design is encouraged throughout the Forum area since developments should complement or enhance their surroundings, which vary across the Forum area.</p> <p>The design guidance in this Plan should be read alongside Lewisham’s Alterations and Extensions SPD (2019) and Greenwich’s Residential Extensions, Basements and Conversions Guidance SPD (2018) Detailed guidance on shopfronts can be found at Annex 1 of this Plan. This should be read alongside Lewisham Shop Front Design Code SPD (2006) and Greenwich Design Guidance for Shop Fronts SPD (2005)</p> <p>If RBG would like to offer additional wording we are happy to consider that also</p> <p>Reply to LBL:</p> <p>Harmony does not prescribe architectural style so we don’t agree with this point. The design codes make clear that modern designs are welcomed, where in harmony with context</p> <p>We accept that we can’t require it but we would like to encourage it.; We</p>	<p>A1: Councils and Forum agree that the wording could be clearer. It is intended to support innovative design of a high quality per HD2B and we suggest this amended wording <i>“Colour and material palate are generally in harmony with those of its context. Any exception to this principle, including contrasting colours and materials on extensions and infill schemes more markedly contemporary in character, should prove to add positively to the surrounding context and be justified by a high architectural and detailing quality”</i>. This may be too long, and perhaps just adding ‘generally’ would be sufficient? <i>“Colour and material palate are <u>generally</u> in harmony with those of its context.”</i></p> <p>A3: Councils and Forum agree that the wording could be clearer. It is intended to support innovative design of a high quality per HD2B ‘may contribute to the ongoing evolution of the local character and identity in order to create a legible historic reference’ and we suggest this amended wording, <i>“applicants are encouraged to consider if the original....”could be repaired and restored..</i></p> <p>Councils and Forum agree that there is confusion about the status of the Area Design Guidance and are agreed in the following steps to address this:</p> <ul style="list-style-type: none"> - Moving the Area Design Guidance, currently in the body of the plan, to an appendix in the neighbourhood plan - Ensuring that all references in the neighbourhood plan consistently use the name ‘Area Design Guidance’ - Ask that applicants ‘demonstrate how the Area Design Guidance’ in appendix X has been taken account of

	<p>planning permission is required, but not in a conservation area is there sufficient evidence within the Neighbourhood Plan to justify the opportunities and make a decision (say to refuse) on this guide?</p>		<p>would like to keep this wording to encourage good design throughout the area</p> <p>We understand this is the case, as it is for Lewishams own SPD, but we would like it to be beefed up as much as possible to maximise chances of implementation. Would Lewisham recommend some wording they would like to see that makes the status and usage of the guide clear to planners – we would be happy to consider incorporating</p>	
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Lee Neighbourhood Plan

Joint Statement of Common Ground

Table 2 – SoCG Site Allocation Policies (Lewisham)

July 2023

Pre-examination stage of the Lee Neighbourhood Plan

All Site Allocations are located within the London Borough of Lewisham; therefore Royal Borough of Greenwich were not involved in the discussions regarding the statement of common ground for the site allocations found in the draft Lee Neighbourhood Plan.

SA01 – Land of Dacre Park	<p>i. Through the consultation period, the Council have held discussions with the forum following a number of objections to this site. It has been agreed with the forum that this site allocation be removed from the plan completely and has been acknowledged that the inclusion of this site allocation in the submission version of the plan was indeed a mistake made by the forum</p>	No site allocations are situated within the Royal Borough of Greenwich.	<p>i. Forum agreed with Council comment</p>	It is agreed by the Council and Forum that this site allocation be removed from the Plan at examination.
SA02 – Land on Old Road	<p>i. As a requirement any proposed new development will have to submit a design and access statement as part of the validation process for the planning application which will address issues around “residential privacy”. The policy however should use recognised terminology such as overlooking. The Lewisham Council Small Sites SPD provides a clear expectation of the level of design expected in small site developments within the borough.</p> <p>ii. Who would be responsible for drafting a clear design code?</p> <p>iii. There is no indicative capacity presented in the Site Allocation</p>	No site allocations are situated within the Royal Borough of Greenwich.	<p>i. We are happy to change the wording to ‘overlooking’ per Lewisham’s suggestion and also to refer to Lewisham’s small sites SPD</p> <p>ii. There has been a misunderstanding in the wording used by the Forum. We were meaning to refer to the design guidance in the neighbourhood plan and had not understood that a design code was something different. We suggest therefore</p> <ul style="list-style-type: none"> - moving the Area Design Guidance, currently in the body of the plan, into an appendix to the neighbourhood plan - ensuring that all references in the neighbourhood plan consistently use the name ‘Area Design Guidance’, not ‘Design Guide’ or ‘Design Code’ as we have currently used, referring to the same thing, which has caused this confusion. - In this site allocation, to include the wording ‘applicants must demonstrate how the Area Design Guidance in Appendix x has been taken account of’. <p>iii. We understand it is not a requirement of a site allocation to include a capacity range. We have instead taken a design led approach which increases flexibility and will ensure that any scheme makes effective use of land.</p>	<p>i. Council and Forum are agreed in changing wording to ‘residential amenity such as overlooking’, to making reference to The Council’s Small Sites SPD in this section</p> <p>ii. Council and Forum agree with the position of</p> <ul style="list-style-type: none"> - moving the Area Design Guidance, currently in the body of the plan, into an appendix to the neighbourhood plan - ensuring that all references in the neighbourhood plan consistently use the name ‘Area Design Guidance’, not ‘Design Guide’ or ‘Design Code’ as we have currently used, referring to the same thing, which has caused this confusion. - In this site allocation, to include the wording ‘applicants must demonstrate how the Area Design Guidance in Appendix x has been taken account of’. <p>iii. Council and Forum are agreed that this is a design led site allocation</p>

SA03 – Old Road Depot	<p>This is a Council owned site still in use, however after consulting with the capital programme delivery team there are no serious objections to this site allocation, however;</p> <ul style="list-style-type: none"> i. If the wall is not nationally listed there is no guarantee that it can be protected through planning policy ii. As a requirement any proposed new development will have to submit a design and access statement as part of the validation process for the planning application which will address issues around “residential privacy”. The policy however should use recognised terminology such as overlooking. The Lewisham Council Small Sites SPD provides a clear expectation of the level of design expected in small site developments within the borough. iii. Who will produce the design code? Please reference the Lewisham Council Small Sites SPD. iv. There would need to be significant evidence to show why the building heights should not exceed adjacent buildings in height v. Please reference Lewisham Council’s Small Sites SPD vi. There is no indicative capacity presented in the Site Allocation 	No site allocations are situated within the Royal Borough of Greenwich.	<ul style="list-style-type: none"> i. We suggest changing the wording to ‘attempt to preserve’ (the wall) ii. We are happy to change the wording per Lewisham’s suggestion iii. There has been an misunderstanding in the wording used by the Forum. We were meaning to refer to the design guidance in the neighbourhood plan, and had not understood that a design code was something different. We suggest therefore <ul style="list-style-type: none"> - moving the Area Design Guidance, currently in the body of the plan, into an appendix - ensuring that all reference to the plan consistently uses the name Area Design Guidance, not Design Guide or Design Code as we have currently done, which has caused confusion - In this site allocations to include the wording ‘applicants must demonstrate how the Area Design Guidance in Appendix x has been taken account of’. iv. We would be happy to remove the wording ‘building heights should not exceed adjacent buildings’ heights’. This was inserted in error between S14 and S16 due to error in communication between forum committee members editing the plan, who had meant only to reference specific heights in three Lee Green town centre sites, where additional supporting evidence had been obtained. v. We are happy to refer to Lewisham’s small sites SPD vi. We understand it is not a requirement of a site allocation to include a capacity range. We decided instead to take a design led approach which increases flexibility and will ensure that any scheme makes effective use of land. 	<ul style="list-style-type: none"> i. Council and Forum are agreed with the wording ‘will support applications attempting to preserve the surrounding wall’ ii. Council and Forum are agreed in changing wording to ‘residential amenity such as overlooking’. iii. Council and Forum agree with the position of <ul style="list-style-type: none"> - moving the Area Design Guidance, currently in the body of the plan, into an appendix to the neighbourhood plan - ensuring that all references in the neighbourhood plan consistently use the name ‘Area Design Guidance’, not ‘Design Guide’ or ‘Design Code’ as we have currently used, referring to the same thing, which has caused this confusion. - In this site allocation, to include the wording ‘applicants must demonstrate how the Area Design Guidance in Appendix x has been taken account of’. iv. Council and Forum are agreed to remove this phrase since it was inserted in error between S14 and S16 and Council remain concerned that there is not enough evidence regarding building heights for this site v. Council and Forum are to making reference to the Council’s Small Sites SPD in this section vi. Council and Forum are agreed that this is a design led site allocation
SA04 – Garage Site on Burnt Ash Hill	<ul style="list-style-type: none"> i. This site has recently received planning permission REF DC/20/119025. It has since been removed from the emerging Local Plan. It is advised that the Neighbourhood Plan does the same. 	No site allocations are situated within the Royal Borough of Greenwich.	<ul style="list-style-type: none"> i. Forum agrees with Council comment 	<ul style="list-style-type: none"> ii. The Council and Forum agree that this Site Allocation be removed from the Plan
SA05 – Site of disused	<ul style="list-style-type: none"> i. As a requirement any proposed new development will have to submit a design and access statement as part of the 	No site allocations are situated within the Royal Borough of Greenwich.	<ul style="list-style-type: none"> i. We are happy to change the wording to ‘overlooking’ per Lewisham’s suggestion 	<ul style="list-style-type: none"> i. Council and Forum are agreed in changing wording to ‘residential amenity such as overlooking’ and to

Garages on Wisteria Road	<p>validation process for the planning application which will address issues around “residential privacy”. The policy however should use recognised terminology such as overlooking.</p> <p>ii. The Lewisham Council Small Sites SPD provides a clear expectation of the level of design expected in small site developments within the borough. Who would be responsible for drafting a clear design code?</p> <p>iii. There is no indicative capacity presented in the Site Allocation</p>		<p>ii. There has been a misunderstanding in the wording used by the Forum. We were meaning to refer to the design guidance in the neighbourhood plan, and had not understood that a design code was something different. We suggest therefore</p> <ul style="list-style-type: none"> - moving the Area Design Guidance, currently in the body of the plan, into an appendix - ensuring that all reference to the plan consistently uses the name Area Design Guidance, not Design Guide or Design Code as we have currently done, which has caused confusion - This site allocation to include the wording ‘applicants must demonstrate how the Area Design Guidance in Appendix x has been taken account of’ <p>iii. We understand it is not a requirement of a site allocation to include a capacity range. We decided instead to take a design led approach which increases flexibility and will ensure that any scheme makes effective use of land.</p>	<p>making reference to The Council’s Small Sites SPD in this section</p> <p>ii. Council and Forum agree with the position of</p> <ul style="list-style-type: none"> - moving the Area Design Guidance, currently in the body of the plan, into an appendix to the neighbourhood plan - ensuring that all references in the neighbourhood plan consistently use the name ‘Area Design Guidance’, not ‘Design Guide’ or ‘Design Code’ as we have currently used, referring to the same thing, which has caused this confusion. - In this site allocation, to include the wording ‘applicants must demonstrate how the Area Design Guidance in Appendix x has been taken account of’. <p>iii. Council and Forum are agreed that this is a design led site allocation</p>
SA06 – Effingham Road	<p>i. Any development within a conservation area will be assessed on its own merits with particular consideration given to the impact the development will have on the built heritage in which surrounds it.</p> <p>ii. There is no indicative capacity presented in the Site Allocation</p>	No site allocations are situated within the Royal Borough of Greenwich.	<p>i. The forum agrees</p> <p>ii. We understand it is not a requirement of a site allocation to include a capacity range. We decided instead to take a design led approach which increases flexibility and will ensure that any scheme makes effective use of land.</p>	<p>i. Council and Forum agree regarding planning requirements for development within the conservation area</p> <p>ii. Council and Forum are agreed that this is a design led site allocation and to also state in this section that ‘Applicants must demonstrate how the Area Design Guidance in Appendix x has been taken account of’</p>
SA07 – Sainsburys Site	<p>i. This site allocation has been identified in the emerging Lewisham Local Plan as a major strategic site within the Borough and is required to meet its London Plan targets. The Council does not consider that the restrictive approach to design and particularly building heights would be consistent with London Plan policies including GG2 Making Best Use of Land or Policy D3 Optimising site capacity through the design- led approach.</p> <p>Part vi. This policy stipulates that building heights do not exceed adjacent building heights. This section should be deleted as there is no appropriate evidence to support this being included.</p> <p>There is no indicative capacity presented in the Site Allocation. The Council would</p>	No site allocations are situated within the Royal Borough of Greenwich.	<p>i. Lewisham council released its Tall Building Addendum and S19 Local Plan for consultation after the Lee Neighbourhood Plan was submitted for S16 consultation. The forum consider Lewisham’s evidence to be stronger than the forum’s evidence and wish to align with the council’s Local Plan as requested by the council.</p> <p>For this reason we are happy to follow option B proposed by the council and replace the current wording at vi. with wording copied from Lewisham’s S19 Local Plan policy QD4C and 5.22 pg 84 and the neighbourhood plan’s Area Design Guidance as follows</p> <p>“ the maximum height of building on this site shall not normally be more than 32.8 meters(10 storeys) to 39.2 meters (12 storeys; Development should be designed and built to the human scale per Policy HD2C of this plan, for example, by integrating generous public realm treatments, building set-backs and articulations, active</p>	<p>i. Part vi currently reads as:</p> <p>‘ vi. Building form, proportions, height, and overall appearance should be considerate towards local character and any new addition should positively contribute to this character. Building heights should not exceed adjacent buildings’ height and height and bulking should be of human scale per Policy HD2C of this plan; consider the use of upper storey set backs, where appropriate, to reduce any height impacts at street level’’</p> <p>Council and Forum are agreed to replace the wording with wording found in the Lewisham Local Plan mainly regarding height, whilst retaining the rest at part vi.</p> <p>“ the maximum height of building on this site shall not normally be more than 32.8 meters(10 storeys)</p>

	<p>advise the Forum to either A – Remove the site allocations to avoid confusion or B ensure the allocations are consistent with the draft Local Plan and add further local detail in an evidenced manner</p> <p>ii. There is no indicative capacity presented in the Site Allocation</p>		<p>ground floor frontages and greening measures. applicants must demonstrate how the Area Design Guidance in Appendix x has been taken account of”</p> <p>ii. We understand it is not a requirement of a site allocation to include a capacity range. We decided instead to take a design led approach which increases flexibility and will ensure that any scheme makes effective use of land.</p> <p>We do not intend to include these as have taken a design led approach</p> <p>iii. Although the council has not requested removal of v. ‘Lee High and Lee Green crossroads are proposed conservation areas in this plan and this site’s Lee High Road facing side would fall within and face these conservation areas, so should be developed with sensitivity and appropriately to this heritage’, it has required removal of similar on other sites, and if required at examination we would be happy to remove this: the proposed conservation areas are aspirations which are referenced in Recommended Actions in the plan and we are advised are best not referenced in policy</p>	<p>to 39.2 meters (12 storeys); Proposals will be supported if it is designed and built to human scale showing regard to Policy HD2C of this plan, for example, by integrating generous public realm treatments, building set-backs and articulations, active ground floor frontages and greening measures. <i>Applicants must demonstrate how the Area Design Guidance found in Appendix x has been considered in the design and access statement, illustrating how proposals respect the grade II listed police station within the immediate vicinity of the building</i></p> <p>ii. Council and Forum are agreed that this is a design led site allocation</p> <p>iii. Councils and Forum are agreed to remove reference to proposed conservation areas</p>
SA08 – Site at 321-341 Lee High Road	<p>i. This site allocation has been identified in the emerging Lewisham Local Plan as a major strategic site within the Borough and is required to meet its London Plan targets. The Council does not consider that the restrictive approach to design and particularly building heights would be consistent with London Plan policies including GG2 Making Best Use of Land or Policy D3 Optimising site capacity through the design- led approach. The Council would advise the Forum to either A – Remove the site allocations to avoid confusion or B ensure the allocations are consistent with the draft Local Plan and add further local detail in an evidenced manner.</p> <p>ii. Conservation areas proposed through the neighbourhood plan do not offer any protection and can therefore not be considered during a planning application.</p> <p>iii. There is no indicative capacity presented in the Site Allocation</p>	No site allocations are situated within the Royal Borough of Greenwich.	<p>i. The forum are happy to remove the wording ‘Building heights should not exceed adjacent buildings’ height’ from point v. in the site allocation and replace it with this wording taken from Lewisham’s Tall Building Addendum 4.51 Step 1: ‘Tall buildings would not be appropriate on this site due to site size and sensitivities’</p> <p>ii. we are happy to remove reference to proposed conservation areas: the proposed conservation areas are aspirations listed elsewhere in the plan as ‘recommended actions’ which we are advised are best not referenced in policy</p> <p>iii. We understand it is not a requirement of a site allocation to include a capacity range. We decided instead to take a design led approach which increases flexibility and will ensure that any scheme makes effective use of land.</p>	<p>i. The table on pg 51 of the tall building review 2023 states that the council does not believe that tall buildings would be possible for this site due to its size and sensitivities and is again clearly identified as unsuitable for tall buildings in the map on page 53. Council recommend wording of part v of this policy be amended to “<i>Proposals where building heights should do not exceed adjacent buildings will be supported..”</i></p> <p>ii. Council and Forum are agreed to remove reference to proposed conservation areas</p> <p>iii. Council and Forum are agreed that this is a design led site allocation</p> <p>iv. Applicants must demonstrate how the Area Design Guidance found in Appendix x has been considered in the design and access statement for development proposals within an immediate vicinity of a listed building</p>

SA09 – Disused Lockup garages of Burnt Ash Road	<ul style="list-style-type: none"> i. As a requirement any proposed new development will have to submit a design and access statement as part of the validation process for the planning application which will address issues around “residential privacy”. The policy however should use recognised terminology such as overlooking. The Lewisham Council Small Sites SPD provides a clear expectation of the level of design expected in small site developments within the borough. ii. Who would be responsible for drafting a clear design code? iii. There is no indicative capacity presented in the Site Allocation 	No site allocations are situated within the Royal Borough of Greenwich.	<ul style="list-style-type: none"> i. We are happy to change the wording to ‘overlooking’ per Lewisham’s suggestion and also to refer to Lewisham’s small sites SPD ii. There has been a misunderstanding in the wording used by the Forum. We were meaning to refer to the design guidance in the neighbourhood plan, and had not understood that a design code was something different. We suggest therefore iv. moving the Area Design Guidance, currently in the body of the plan, into an appendix to the neighbourhood plan ensuring that all references in the neighbourhood plan consistently use the name ‘Area Design Guidance’, not ‘Design Guide’ or ‘Design Code’ as we have currently used, referring to the same thing, which has caused this confusion. v. In this site allocation, to include the wording ‘applicants must demonstrate how the Area Design Guidance in Appendix x has been taken account of’. vi. We understand it is not a requirement of a site allocation to include a capacity range. We have instead taken a design led approach which increases flexibility and will ensure that any scheme makes effective use of land. 	<ul style="list-style-type: none"> i. Council and Forum are agreed in changing wording to ‘residential amenity such as overlooking’ and to making reference to The Council’s Small Sites SPD in this section ii. Council and Forum agree with the position of vii. moving the Area Design Guidance, currently in the body of the plan, into an appendix to the neighbourhood plan ensuring that all references in the neighbourhood plan consistently use the name ‘Area Design Guidance’, not ‘Design Guide’ or ‘Design Code’ as we have currently used, referring to the same thing, which has caused this confusion. viii. In this site allocation, to include the wording ‘applicants must demonstrate how the Area Design Guidance in Appendix x has been taken account of’. ix. Council and Forum are agreed that this is a design led site allocation
SA10 – Leegate Shopping centre	<ul style="list-style-type: none"> i. The site allocation for the Leegate centre was submitted as part of the Reg 15 submission version of the neighbourhood plan meaning the Council did not have an opportunity to comment on this during the Reg 14 consultation. It is therefore recommended that this site allocation be removed from the plan. ii. This site allocation has been identified in the emerging Lewisham Local Plan as a major strategic site within the Borough and is required to meet its London Plan targets. The Council does not consider that the approach to building heights is evidenced in an appropriate manner and do not consider the site allocation to be consistent with London Plan policies including GG2 Making Best Use of Land or Policy D3 Optimising site capacity through the design-led approach. <p>The council would also like to note its concern to rigid building height requirements</p>	No site allocations are situated within the Royal Borough of Greenwich.	<ul style="list-style-type: none"> i. The forum was in possession of evidence capable of backing a site allocation at 2019 S14 neighbourhood plan consultation, however, as agreed with the council at the time, it was decided not to include a site allocation as a planning application had been submitted to the council for the site in 2018 and as such it was felt that the plan could hold no weight for the site at that time. <p>By the time of the 2022 S16 neighbourhood plan consultation, the site had been sold to a new owner, and the 2018 submitted plans withdrawn. Lewisham’s Local Plan was then released for consultation and we saw that it had included a site allocation for Leegate so we realised it was possible for a site allocation to be included. For these reason the Forum decided to include a site allocation using the evidence it had (AECOM’s Design and Masterplanning report; Lee Forum’s community consultation, Lewisham’s 2021 Local Plan consultation evidence on Commonplace, and HTA’s Basic Conditions statement)</p>	<ul style="list-style-type: none"> i. Part vii currently reads as: ‘vii. This site faces an area proposed to be a conservation area by Edmond Bird, Mayor of London heritage advisor in 2009, and formally applied to be such by Lee Forum in 2021. This local heritage which fronts the site on two sides consists of 2-4 storey buildings. Behind Leegate, set back from public realm is a 1960s housing estate 11 stories high. Lewisham’s draft Local Plan states that these estates are anomalies and should not be taken as absolute reference for future building hights. AECOM’s 2022 SEA compared the environmental and social benefits of building taller than current heights versus building no higher than 11 stories and scored building no higher than 11 highest. AECOM’s design report of 2019 and 2021 Lewisham’s Local Plan consultation also gathered

	<p>without sufficient design development in accordance with London plan Policy D3. The detail of evidence provided through the SEA undertaken by ACEOM regarding the suitability of a 11 or 15 story structure at Leegate is considered to be insufficient to determine suitable building heights through this site allocation.</p> <p>iii. There is no indicative capacity presented in the Site Allocation</p>		<p>We wish to retain the site allocation in the plan as it is the most commented-on and analysed site in the forum area evidence</p> <p>ii. Lewisham council released its Tall Building Addendum and S19 Local Plan for consultation after the Lee Neighbourhood Plan was submitted for S16 consultation. The forum consider Lewisham’s evidence to be stronger than the forum’s evidence and wish to align with the council’s Local Plan, as requested by the council.</p> <p>For this reason we are happy to follow option B proposed by the council (be consistent with the draft Local Plan) and suggest replacing the current wording at vii. with wording copied from Lewisham’s S19 consultation Local Plan policy QD4C and 5.22 pg 84 and the neighbourhood plan Area Design Guidance as follows</p> <p>“ In accordance with Lewisham’s 2022 S19 Local Plan policy QD4C and 2023 Tall Building Addendum, the maximum height of building on this site shall not normally be more than 32.8 meters(10 storeys) to 39.2 meters (12 storeys, and designed and built to the human scale per Policy HD2C of this plan, for example, by integrating generous public realm treatments, building set-backs and articulations, active ground floor frontages and greening measures. Applicants must demonstrate how the Area Design Guidance in Appendix x has been taken account of’</p> <p>iii. We understand it is not a requirement of a site allocation to include a capacity range. We have decided instead to take a design led approach which increases flexibility and will ensure that any scheme makes effective use of land.</p>	<p>overwhelming evidence that the local community agree do not want to see the site built over 11 stories. Height and bulk therefore should be of human scale per Policy HD2C of this plan; consider the use of upper storey setbacks, where appropriate, to reduce any height impacts at street level.</p> <p>Council and Forum are agreed to replace the wording with wording found in the Lewisham Local Plan mainly regarding height, whilst retaining the rest at part vii as follows</p> <p>““ In accordance with Lewisham’s 2022 regulation 19 Local Plan policy QD4C and 2023 Tall Building Addendum, the maximum height of building on this site shall not normally be more than 32.8 meters(10 storeys) to 39.2 meters (12 storeys, and designed and built to the human scale per Policy HD2C of this plan, for example, by integrating generous public realm treatments, building set-backs and articulations, active ground floor frontages and greening measures. Applicants must <i>demonstrate how the Area Design Guidance found in Appendix x has been considered in the design and access statement, illustrating how proposals respect the grade II listed fire station within the immediate vicinity of the building</i></p> <p>ii. Council and Forum are agreed that this is a design led site allocation</p>
<p>SA11 – Garages on the corner of Millbank Way and Osberton Road</p>	<p>i. As a requirement any proposed new development will have to submit a design and access statement as part of the validation process for the planning application which will address issues around “residential privacy”. The policy however should use recognised terminology such as overlooking. The Lewisham Council Small Sites SPD provides a clear expectation of the</p>	<p>No site allocations are situated within the Royal Borough of Greenwich.</p>	<p>i. We are happy to change the wording to ‘overlooking’ per Lewisham’s suggestion and also to refer to Lewisham’s small sites SPD</p> <p>ii. We understand it is not a requirement of a site allocation to include a capacity range. We have decided instead to take a design led approach which increases flexibility and will ensure that any scheme makes effective use of land.</p>	<p>i. Council and Forum are agreed in changing wording to ‘residential amenity such as overlooking’ and to making reference to The Council’s Small Sites SPD in this</p> <p>ii. Council and Forum agree with the position of</p>

	<p>level of design expected in small site developments within the borough</p> <p>ii. There is no indicative capacity presented in the Site Allocation</p>			<p>x. moving the Area Design Guidance, currently in the body of the plan, into an appendix to the neighbourhood plan ensuring that all references in the neighbourhood plan consistently use the name 'Area Design Guidance', not 'Design Guide' or 'Design Code' as we have currently used, referring to the same thing, which has caused this confusion.</p> <p>xii. In this site allocation, to include the wording 'applicants must demonstrate how the Area Design Guidance in Appendix x has been taken account of'.</p> <p>iii. Council and Forum are agreed that this is a design led site allocation</p>
SA12 – Vehicle Hire Corner of Lee High Road and Monor Park	<p>i. As a requirement any proposed new development will have to submit a design and access statement as part of the validation process for the planning application which will address issues around "residential privacy". The policy however should use recognised terminology such as overlooking. The Lewisham Council Small Sites SPD provides a clear expectation of the level of design expected in small site developments within the borough.</p> <p>ii. Conservation areas proposed through the neighbourhood plan do not offer any protection and can therefore not be considered during a planning application.</p> <p>iii. There is no indicative capacity presented in the Site Allocation</p>	No site allocations are situated within the Royal Borough of Greenwich.	<p>i. We are happy to change the wording to 'overlooking' per Lewisham's suggestion and also to refer to Lewisham's small sites SPD</p> <p>ii. we are happy to remove reference to proposed conservation areas: the proposed conservation areas are aspirations listed elsewhere in the plan as 'recommended actions' which we are advised are best not referenced in policy</p> <p>iii. We understand it is not a requirement of a site allocation to include a capacity range. We decided instead to take a design led approach which increases flexibility and will ensure that any scheme makes effective use of land.</p>	<p>i. Council and Forum are agreed in changing wording to 'residential amenity such as overlooking' and to making reference to The Council's Small Sites SPD, and to include the wording 'applicants must demonstrate how the Area Design Guidance in Appendix x has been taken account of' in this section</p> <p>ii. Council and Forum are agreed to remove reference to proposed conservation areas</p> <p>iii. Council and Forum are agreed that this is a design led site allocation</p>