

Mark Rochell
Joint Chair Lee Forum
Lee Neighbourhood Forum

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Our ref: SL/2007/101451/OR-14/IS1

Your ref: Email

Date: 30 August 2019

Dear Mark Rochell

Lee Neighbourhood Development Plan. Draft for public consultation June 2019

Thank you for consulting us on the above. We have reviewed the Lee Neighbourhood Development Plan and overall, we are very pleased with the plan and the objectives that it sets out to achieve. We support the nature improvements along River Quaggy and proposals to naturalise the rest of the stretch within the neighbourhood. River corridors are important habitats and can be valuable links between larger areas of habitat enabling wildlife to move between them. Establishing green buffer zones along watercourse helps to protect and enhance this function.

A key challenge to the plan is private spaces interrupting the connectivity of the public access links along the river corridors. Where the key public access links along the river corridors are interrupted by land in private ownership, the Council can use its powers to make changes to the Public Rights of Way network within the Borough. New routes may be created either through an agreement between the local authority and the landowner, or compulsorily by order. The London Rivers Action Plan provides a tool for identifying river restoration opportunities early in the planning process. For more detail please visit <http://www.therrc.co.uk/lrap.php>

All our maps and data sets are regularly reviewed and updated so it's important you are using the latest data as part of the evidence base for the Neighbourhood Development Plan. The latest data and maps are available to download from: <https://data.gov.uk/data/search?theme-primary=Environment>

We have provided more information below for your consideration. Please do not hesitate to contact me should you wish to discuss this further.

Yours sincerely,

Charles Muriithi, MRTPI
Planning Specialist

Sustainable Places
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We have the following comments:

5.3.3. Objectives

We are very pleased to see that sustainable drainage has been included in the objectives of the plan. Increasing the amount of green space within the neighbourhood will help to reduce the risk of surface water flooding.

5.3.6. Lee Neighbourhood Development Plan Policies

There are 2 'A' bullet points under Policy GB1

Policy GB2 - We are pleased to see that inclusion of these requirements as they will help to manage surface water flood risk within the area.

Policy GB3 – It is good to see the commitment to ensure that natural banks and floodplain of the River Quaggy are maintained. It could be possible to expand this requirement to require new riverside developments to naturalise the riverbank where it has not already been done.

5.3.7. Recommended Further Actions

It would be useful to include parts of the Environment Agency as a partner to work with in designing the linear park along the River Quaggy. This is because some of the works may need to be covered by a Flood Risk Activity Permit and some teams may have certain requirements for these sort of works.

Policy B5 Managing Flood Risk

The boroughs Strategic Flood Risk Assessments should be the primary source of flood risk information in considering whether particular neighbourhood planning areas may be appropriate for development. As pointed out in the National Planning Policy Practice Guidance, where the neighbourhood planning area is in Flood Zone 2 or 3, or is in an area with critical drainage problems, advice on the scope of the flood risk assessment required should be sought from the Environment Agency. Where the area may be subject to other sources of flooding, it may be helpful to consult other bodies involved in flood risk management as appropriate.

We've updated our external guidance for Local Planning Authorities (LPAs) on how to prepare a Strategic Flood Risk Assessment (SFRA). The guidance was published on GOV.UK on Monday 12 August 2019. The URL is unchanged: <https://www.gov.uk/guidance/local-planning-authorities-strategic-flood-risk-assessment>.

SFRAs are a vital tool for understanding all sources of flood risk and for assessing how climate change will change this risk over time. They help LPAs make informed decisions about future development. They're also invaluable for identifying the opportunities sustainable development may present for reducing the causes and impacts of flooding, and for safeguarding the land likely to be needed for future flood risk management infrastructure.

We are pleased to see the requirement for new development to incorporate SuDs into new development. However, we believe that the wording of point 'B' may create a 'get out clause' for developers who are able to demonstrate that including SuDs is not viable. Wording should be included that states that if SuDs cannot be included on the site, the developer should contribute to a scheme in the surrounding area – this could be by implementing a scheme, or by providing some money for a future scheme.

It will be essential that SUDS are properly planned at the onset of planning for the development. Developers and their design teams need to take into account different factors including the layout of the site, topography and geology when planning and positioning the different SUDS elements for the whole development schemes. This information will be required for both outline and full applications so it is clearly demonstrated that the SUDS can be accommodated within the development that is proposed.

6.1.7. Policy SA07: Sainsbury's Site

This site is located within our modelled flood outline of the River Quaggy. This should be included within the site constraints and to ensure that any future development takes this into account. The Environment Agency would not support any development at this site that would result in an increase in flood risk – both on and off the site.

6.1.8. Policy SA08: Site at 321-341 Lee High Road SE12 8RU

This site is located within our modelled flood outline of the River Quaggy. This should be included within the site constraints and to ensure that any future development takes this into account. The Environment Agency would not support any development at this site that would result in an increase in flood risk – both on and off the site.

This site is located within 8m of the River Quaggy and as such, any works on this site may be subject to a Flood Risk Activity Permit. This should be included within the site constraints so that any future development will take this into consideration at the appropriate time.

6.1.13. Policy SA13: Courtlands Estate Lockup garages

This site is located within our modelled flood outline of the River Quaggy. This should be included within the site constraints and to ensure that any future development takes this into account. The Environment Agency would not support any development at this site that would result in an increase in flood risk – both on and off the site.

This site is located within 8m of the River Quaggy and as such, any works on this site may be subject to a Flood Risk Activity Permit. This should be included within the site constraints so that any future development will take this into consideration at the appropriate time.

We would advise that any works to create the green chain walk along the River Quaggy may be subject to a Flood Risk Activity Permit. We would advise that early contact is made with the Environment Agency to begin these conversations as soon as possible. We will be able to advise what works will need to be covered by a permit and what level of information will be required. For more detail please contact us at: PSO.SELondonandNKent@environment-agency.gov.uk

Ravensbourne River Corridor Improvement Plan

The London Borough of Lewisham and the Environment Agency have worked in partnership to produce the Ravensbourne River Corridor Improvement Plan. The purpose of the plan is to ensure that all works along the river corridors are of a high quality and guided by the protection and enhancement of local amenity. It promotes the sustainable and efficient use of space by protecting and enhancing the multifunctional nature of the Ravensbourne, Quaggy and Pool Rivers, Deptford Creek and the River Thames. A balance is sought between the interests of environmental protection and enhancement, flood risk, housing supply and economic growth.

The River Quaggy is designated as a single water body under the Water Framework Directive (WFD). The main issue that affects the Quaggy is modifications made to the river as a result of urbanisation of the catchment, including land usage for residential, commercial and transport infrastructure as well as alterations to the river channel for flood defence purposes. This has resulted in the degradation of habitat in large stretches of the river, generally due to the widening of the channels and installation of concrete walls and sections of culverts. This issue is accentuated by low summer flows and the 'flashy' nature of the catchment, with rainwater falling on hard surfaces and flowing directly to the river channel without any attenuation or settlement. This results in fluctuations in water quality and flows, both of which are impacting the biological potential of the river, with fish, invertebrates and plant life struggling to colonise and survive in the catchment.

Urban watercourses often provide excellent opportunities to include biodiversity enhancements in a development. Environmental improvement options and case studies are available on the Healthy Catchments section of the RESTORE website (<http://www.restorerivers.eu/RiverRestoration/Floodriskmanagement/HealthyCatchmentsmanagingforfloodriskWFD/tabid/3098/Default.aspx>). Land adjacent to watercourses is particularly valuable for wildlife and it is essential this is protected. Article 10 of the Habitats Directive also stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity. Such networks may also help wildlife adapt to climate change

Biosecurity measures to prevent the spread of invasive non native species are particularly important for works near watercourses, during both development and subsequent maintenance. Construction Management Plans/Method Statements and Landscape Management Plans should incorporate principles of the Check-Clean Dry campaign. For more detail please visit: <http://www.nonnativespecies.org/checkcleandry/>