

Lee Draft Neighbourhood Plan Pre-submission Consultation

I General Comments on draft Plan

- I.1 Officers acknowledge the hard work that has gone into identifying and planning for those issues that the Forum feels are of particular importance within their Neighbourhood Area. The content of the Draft Neighbourhood Plan has clearly been carefully considered and prepared to reflect the proprieties of local people, following local engagement. Officers are aware that engagement events have occurred but these will need to be evidenced. Section 1.8 Community Engagement refers to a Consultation Statement: the statement has not been provided; it will need to be provided at the Submission stage.
- I.2 It is good practice for a Neighbourhood Forum to prepare a basic conditions statement to demonstrate to the Inspector that the Neighbourhood Plan meets the basic conditions. Section 1.9 of the Draft Plan refers, but the statement has not been supplied. The Forum should be advised to consider how their Draft Plan meets the basic conditions and to prepare such a statement explaining this in further detail.
- I.3 The role of a Neighbourhood Plan is to support the delivery of sustainable development in the local area. It must support the delivery of strategic policies that are contained within the Boroughs' Local Plans and conform with policies set out in the higher-level planning documents; the NPPF, London Plan and RB Greenwich Local Plan. They can also identify locally specific issues and policies, identify small sites, and set priorities for the use of neighbourhood Community Infrastructure Levy (CIL) funding.
- I.4 It is worth noting that the Neighbourhood Plan will be required to be in conformity with adopted versions of these plans at the time it undergoes examination. The Forum should be advised to give consideration to the latest emerging higher-level documents, in order to avoid the need for an early stage review of the Neighbourhood Plan, should it come into force. The Forum should also be advised to commission an independent Health Check prior to the submission stage.
- I.5 Neighbourhood plan policies should be supported by sufficiently robust evidence to withstand scrutiny at examination and/or challenge from developers during the development management process. A strong localized evidence base should support neighbourhood policies that add local specificity to strategic policies. Section 1.9 refers to Key Supporting Evidence which has informed the development of Policies in the Plan. Annex 1 lists the Key Evidence Reports and it is positive to note that there are a number of locally prepared documents; however links to these documents are not included. They will need to be provided at Submission stage.
- I.6 The Neighbourhood Plan is rather long, taking the focus away from the objectives and policies. The forum should be advised to consider moving Section 2 (Lee Forum Area Profile), and Section 4 (Lee Forum Area – Strengths, Weaknesses and Opportunities) into the Appendices. This would also improve the flow of the Plan, moving straight from the 'Strategic Spatial Principles' identified in Section 3.3 onto the Policies in Section 5.
- I.7 Section 3.3 identifies three Strategic Spatial Principles:
- Green Infrastructure-led development to achieve:
 - *A continuous local green chain walk between Manor Park and Sutcliffe Park linking the route of the River Quaggy*
 - *Increased opportunities for active travel such as walking and cycling in the Forum area.*
 - *The creation of a nature trail connecting the Hither Green Triangle to railside sites of nature conservation importance south of St Mildred's Road. (LB Lewisham)*
 - Heritage-led development to achieve:

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- *Protection and enhancement of heritage assets (designated and non-designated).*
- *Heritage-sensitive design of new development, particularly in the District Town Centre, that considers scales, symmetry, form, massing, detailing and lines of vision.*
- Accessible and connected social-cultural nodes of retail and social activity to achieve
 - *A healthier public realm of routes linking and within the Lee Forum area's retail activity nodes to encourage a thriving local economy.*
 - *Amenities that are able to serve all cultures living in the Forum area, and all age groups from young to old.*

1.8 The Plan contains 21 policies, presented across 6 topic areas:

- Retail and Local Economy
- Heritage and Design
- Green and Blue Spaces
- Community Infrastructure
- Transport and Connectivity
- Building New Homes and Amenities

1.9 For each Policy area, the plan sets out the Policy Intent, Strategic Aim, Objectives, Identification and Mapping, Existing Policies, Lee Neighbourhood Development Plan Policies and Recommended Further Actions. It is considered that this is a logical approach and the Policies are easily identifiable and clearly presented. Some of the detail on the Maps is hard to read at this scale; although this is helped by the identification table.

1.10 When presenting the existing policies however, it would be sufficient to include just the reference numbers, rather than a precis of the Policy. This is unnecessary duplication, and important policy detail could be lost by presenting a summary.

1.11 It is usual practice for policies in plans to include a reasoned justification. The Forum should consider whether this would be helpful to explain the proposed Policy.

1.12 While the general thrust of the Policies is supported, there are issues of concern in many of the policies which it is recommended that the Forum consider. These specific comments are detailed in the attached table.

1.13 Section 6 identifies thirteen Site Allocations, four of which are within RB Greenwich:

- Ref. 9: Derelict Launderette, Ravens Way
- Ref. 10: Garages, Corner of Weigall Road and Ravens Way
- Ref. 11: Site of Demolished Club, Off Weigall Road
- Ref. 13: Lockup Garages, Courtlands Estate (17 blocks)

1.14 Paragraph 6.1 states that the Forum is not supporting development of these sites by including them in the Neighbourhood Plan. This is unusual and requires further consideration. For detailed / specific Site Allocations comments, see attached table.

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- I.15 Section 7 of the plan outlines the Delivery Strategy. Para 7.2 and 7.3 suggest that the Forum be involved in the negotiation of S106 planning agreements and infrastructure provision. This is not considered to be appropriate and should be deleted.
- I.16 Para 7.3 says that the starting point for infrastructure capacity needs should be the Lee Priority Projects Report. Reference should also be made here to the Borough Infrastructure Delivery Plans.
- I.17 Annex 2 contains Area Design Guidance; the Neighbourhood Area is split into 7 character areas. Two of the character areas are within RB Greenwich: North Lee and East Lee. For each area there is an 'Area Policy'. Alternative terminology should be considered as these are not Neighbourhood Plan Policies.
- I.18 Annex 3 sets out the Lee Forum Priority Projects, which is useful to identify areas where Neighbourhood CIL receipts may be directed. The following are relevant to RB Greenwich:
- The River Quaggy Trail
 - Weigall Sports Ground
 - Tree Planting
 - Osborne Terrace Pocket Park
 - Public Realm Improvements
 - Community Facilities and Centres

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2 Specific Policy Comments on draft Plan

REF	POLICY TITLE (if applicable)	RBG COMMENTS
RETAIL AND LOCAL ECONOMY		
Table 1	Retail and Local Employment Sites	Lee Green District Centre is proposed to become a 'District Hub Opportunity Area'. This is not recognised terminology in the retail hierarchy, which in any case is determined at a Regional level. It would be useful to include a column showing the Borough
Figure 6	Retail and Local Employment Sites	It would be useful to show the sites identified in Table 1 on the Map
R1	Maintain, Improve and Sustain the Diversity, Vitality and Viability of Retail Sites	Criterion A will effectively allow any proposals in these areas. There is no reference to protecting retail, which is the prime function of the RBG Local Plan Policy for such areas. 'Employment' should be defined.
R2	Improve Design and Cohesion of Retail Sites	A - Proposal for LBL and RBG to work together to create design code needs clarification C- Suggest rewording to remove 'the Council will exercise strict control over''
R3	Improve and Enhance the Public Realm of Retail/ Cultural Activity Sites	The threshold of the size of development to which this Policy applies should be clarified. There could be an overlap between the requirements of this Policy and improvements to the area that could be sought through S106/CIL.
R4	Protect and Encourage Local Employment Sites	Unclear whether the entire Policy only applies to existing Local Employment Sites identified in Table 1. This needs to be clarified D – This conflicts with SA13
Figure 7	Lee Green District Town Centre Strategy	This map is unclear. Suggest different shading to differentiate between Heritage Buildings and Greenspace

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HERITAGE AND DESIGN		
Table 4	Non-Designated Heritage Assets	Entries 54, 55 & 56 have already been considered by RBG for local heritage listing, and they did not meet the selection criteria for inclusion on the list. It needs to be made clear that it is the Lee Forum which considers these buildings to have merit, but that they have no heritage designation and have not been designated by RB Greenwich. Also, 'buildings of townscape merit' is not a classification that RBG use.
HD1	Designation, Conservation and Enhancement of Heritage Assets	Could this policy be more specific to Lee and the local heritage and identity of the area?
HD2	Design and Scale of New Development	Could this policy be more specific to Lee and the local heritage and identity of the area?
5.2.7	Recommended Further Actions	It should be noted that RBG has a Conservation Area Designation Procedure Note, which sets out the process through which community groups can nominate areas for conservation area status.
GREEN AND BLUE SPACES		
5.3.3	Objectives	2&5 While supported, are not planning matters 3 - The designation of Sites of Importance for Nature Conservation is carried out at a Regional level.
Table 5	Green Space Designation	9 - The designation of Community Open Space should be done through the Local Plan review process. 10-16 – Please consider the RBG Playing Pitch Strategy and the Sport England Criteria for playing field designation.
Figure 9	Green Spaces in Lee Forum Area	Suggest showing MOL / Community Open Space on the key
5.3.5	Existing Policies	Add in: RBG Core Strategy Open Space Policies
GB1	Protection and Enhancement of Green Spaces	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.

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		<p>Ist A (There are 2As) is weaker than the RBG MOL Policy and would allow non-ancillary development on MOL.</p> <p>B/C Policies for development do not fit well in a policy to protect open space. Consider moving these 2 criteria.</p> <p>D is duplication of existing Policy without any local significance. This is already covered by higher level policies and therefore we suggest that the neighbourhood plan avoids unnecessary duplication</p>
GB2	Achieving a Green Infrastructure-led Development Approach	<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.</p> <p>There could be an overlap between the requirements of this Policy and improvements to the area that could be sought through S106/CIL.</p> <p>It is not understood what is meant by the term 'Biodiversity Green Infrastructure'</p> <p>Maintenance would normally be addressed via a planning condition</p>
GB3	Designation of Nature Improvement Areas	<p>A - The threshold of the size of development to which this Policy applies should be clarified.</p> <p>B - Quaggy Trail – Consider whether it is appropriate to include this as a planning policy? As a community objective and physical project, it is useful to include it within the plan to set priorities for the use of neighbourhood Community Infrastructure Levy (CIL).</p>
GB4	Protection and Increase of Tree Cover	<p>A – Non TPO trees can be felled without planning consent.</p> <p>B – Clarify how it will be determined whether a tree is 'impacted'; this could be a subjective judgement.</p> <p>D - The threshold of the size of development to which criterion D2 applies should be clarified. D4 – delete reference to allergy sufferers. Clarify meaning of 'unintended pollution corridors'.</p> <p>E – Non TPO trees can be felled without planning consent. The majority of these issues would be considered in a</p>

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		standard tree survey as required by the RBG local validation list. E6 is not appropriate.
Figure 10	Nature Improvement Areas	Suggest showing MOL / Community Open Space on the key
COMMUNITY INFRASTRUCTURE		
Table 6	Community Buildings in the Lee Forum Area	It would be useful to have a column identifying the Borough, as per other Tables.
5.4.5	Existing Policies	Add in RBG Policy OS(d) Sportsgrounds and Playing Fields
CI1	Protection, Enhancement and Provision of Community Buildings	A – Need to clarify whether all or just one of criteria 1,2 and 3 should be met. B – Need to clarify whether this applies in addition to A. B as a stand-alone criteria would not be supported. C - 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.
CI2	Protection, Enhancement and Provision of Social Infrastructure	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.
CI3	Enhancement of Public Realm Facilities	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. C – Placing of litter bins is unlikely to be considered development and therefore would not require planning permission. D – not all lights will be in correct location for electric vehicle charging. Suggest amending to ‘where appropriate’ E – not appropriate
TRANSPORT AND CONNECTIVITY		
TC1	Protect, Promote and Enhance	A – PTAL is improved only by new public transport, which is a TFL issue

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	Public Transport Provision	
TC2	Improve Measures to Tackle Pollution Levels	<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.</p> <p>A5 – Unreasonable and not appropriate. London Plan sets an appropriate target.</p> <p>A&B could be combined</p>
TC3	Improve Road and Traffic Safety Measures	<p>The catchment area for the impact of individual proposals should be clarified. It is important to consider when these requirements are reasonable and proportionate. There could be an overlap between the requirements of this Policy and improvements to the area that could be sought through S106/CIL.</p>
BUILDING NEW HOMES AND AMENITIES		
5.6.5	Existing Policies	Add in: RBG Core Strategy Housing Policies
Policy Boxes		Shading colour makes the text difficult to read
B1	Housing Delivery	<p>The threshold of the size of development to which this Policy applies should be clarified.</p> <p>B – unnecessary as the Plan should be read as a whole</p>
B2	Windfall Sites	A – delete ref to B1 and the Lee NP, unnecessary as the Plan should be read as a whole
B3	Design of New Development	<p>The threshold of the size of development to which this Policy applies should be clarified. Particularly A3 where the energy efficiency standards vary according to scale of development in the London Plan.</p> <p>A – delete ref to HD2, unnecessary as the Plan should be read as a whole</p> <p>Duplication of existing policies, consider adding local context</p>
B4	Extensions and Alterations to	A6 is too onerous for small scale development which may be unrelated

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	Existing Buildings	
B5	Managing Flood Risk	Duplication of existing policies, consider adding local context
SITE ALLOCATIONS		
SA9	Derelict Launderette, Ravens Way	The site is rather small to be included as a Site Allocation and should be addressed as a windfall site instead. If retained, consider whether the proposed use should be residential or community space. If an appropriate residential scheme is proposed, this would be preferable to the site remaining vacant awaiting a community use proposal.
SA10	Garages, Corner of Weigall Road and Ravens Way	The site is rather small to be included as a Site Allocation and should be addressed as a windfall site instead. If retained, consider whether the proposed use should be restricted to community space/A3. If an appropriate residential scheme is proposed, this would be preferable to the site remaining vacant.
SA11	Site of Demolished Club, Off Weigall Road	This site is Metropolitan Open Land and any proposed development must be ancillary to the existing use of the MOL
SA13	Lockup Garages, Courtlands Estate (17 blocks)	Consider whether it is appropriate for separate sites be treated as one site allocation The SA acknowledges the 'restrictive nature of these small sites' and makes reference to a 'design code'. It is not clear who is to prepare this design code.