

Crofton Park and Honor Oak Neighbourhood Plan – Decision statement

1. Summary

- 1.1. Following an independent examination of the Crofton Park and Honor Oak Neighbourhood Plan (“the Plan”), Lewisham Council recommends that the Plan proceeds to referendum subject to the modifications outlined in Table 1 of this statement.
- 1.2. The Council agrees with the Examiners recommendation that the referendum area for the Crofton Park and Honor Oak Neighbourhood Plan (as modified) should be the designated neighbourhood area set out in (Figure 1) of the Plan.
- 1.3. At its meeting on the 9th March 2022, Mayor and Cabinet approved the officer recommendation that the neighbourhood plan should proceed to a public referendum subject to the policy modifications recommended by the examiner.
- 1.4. The decision statement, Examiners Report and other documents relating to the Plan can be found on the [council website](#)
- 1.5. If the Plan is approved at referendum, the Council will use it alongside the London Plan and Lewisham’s Local Development Framework when making decisions on planning applications in the Crofton Park and Honor Oak Neighbourhood Area.

2. Background

- 2.1. Lewisham Council formally designated the Crofton Park and Honor Oak Neighbourhood Area and approved the Crofton Park and Honor Oak Neighbourhood Forum (“the Forum”) on the 16 July 2014 in accordance with Section 61G of the Town and Country Planning Act 1990.
- 2.2. The designation of the Forum then lapsed after the 5 year term and was formally re-designated on the 20th October 2020 for a further 5 year term.
- 2.3. The Plan was formally submitted to the council at Regulation 15 on the 11th July 2019 where and internal assessment by council officers found the Plan complied with the specified criteria and a Regulation 16 public consultation could be held.
- 2.4. The Plan and its supporting documents went out to a Regulation 16 public consultation for the statutory six week period from the 15th March 2021 to 3rd May 2021. There was then a significant delay in putting the Plan forward to examination due to the form designation lapsing and being unable to hold any consultations during the initial Covid-19 pandemic.
- 2.5. The Council, in consultation with the forum appointed Deborah McCann BSc MRICS MRTPI Dip Arch Dip LD as the independent examiner, to review whether or not the Plan met the basic conditions required by legislation and other legal requirements, and if it should proceed to referendum. The basic conditions are set out in Paragraph 8(2) of schedule 4B of the 1990 Act and provide that the Plan must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area;
- Be compatible with and not breach European Union (EU) obligations and;
- Meet prescribed conditions and comply with prescribed matters

2.6. The examiner considered that a public hearing into the Plan was not required.

2.7. The Examiner's report was issued on the 17th December 2021. It concludes that subject to the modifications recommended in the Report, the Plan meets the basic conditions set out in legislation and should proceed to a local referendum.

3. Decision

3.1. The council has considered each of the recommendations in the Examiner's report and the reasons for them. The council has therefore decided to make the modifications to the Plan set out in Table 1 of this decision statement. These changes are considered to be necessary to ensure that the plan meets the basic conditions and legal requirements

3.2. Lewisham Council agrees:

- a) That the recommendations of the Examiner and the subsequent amendments proposed in Table 1 be accepted
- b) That the Examiner's recommendations that the Crofton Park and Honor Oak Neighbourhood Plan, as modified, proceed to referendum on the basis that the Plan meets the basic conditions and complies with the statutory definition of a neighbourhood development plan.
- c) That the referendum area should be the Crofton Park and Honor Oak Neighbourhood Area as designated by Lewisham Council in July 2014.

Fig 1. Crofton Park and Honor Oak Neighbourhood Area



Proposed modification number (PM)	Page no. of Plan/ other reference	Examiners recommended modifications New text shown as <u>underlined</u> Deletions shown as striketrough	Lewisham Council response and reasons for change
PM1	Policy H1, Pg 37	<p>H1 Housing</p> <p>1. Residential development shall <u>which provides</u> a range of housing types to meet local housing needs, as appropriate This shall be achieved through <u>will be supported where it:</u></p> <p>a. provision of <u>Provides</u> affordable housing in line with the 50% target as set out in the Local Development Plan;</p> <p>b. provision of <u>Provides</u> social and intermediate housing in line with the Development Plan;</p> <p>c. provision of <u>Provides</u> a range of different sized units, including family housing (3+ bedrooms);</p> <p>d. appropriate provision of homes for the elderly and disabled, which promote accessibility;</p> <p>e. <u>Makes an</u> appropriate provision for necessary social infrastructure including education, health and community facilities.</p>	Agree with the modification of the text in this policy as required for clarity and to meet the basic conditions.

		<p>2. All new residential development should reflect the character of the Neighbourhood Plan area and will be required to be of a high design quality in accordance with Policies BE1 and BE2.</p> <p>3. Proposals for community-led self-build housing on appropriate sites will be supported.</p>	
PM2	Policy H2, Pg 38	<p>H2 Windfall Sites</p> <p>The development of sites which are not allocated for housing will be supported where the proposals satisfy the criteria set out in Policy H1 and provided that the proposed development is in accordance with other policies in the Neighbourhood Plan.</p> <p>Residential development will not be permitted <u>supported</u> where:</p> <p>a. the site is located within the Malham Road LEL;</p> <p>b. the site is in existing employment use and development would be contrary to Policy E2;</p>	Agree with the modification of the text in this policy as required for clarity and to meet the basic conditions.

		<p>c. development would result in the loss of existing community facilities contrary to Policies C1 and C2;</p> <p>d. the site is located within a local centre and development would adversely impact on the character and vitality of that centre contrary to Policies NC1 and NC2;</p> <p>e. development would result in the loss of green space;</p> <p>f. development would have an adverse impact on the biodiversity and ecological value of a Site of Importance for Nature Conservation (SINC), on the integrity of the SINC alongside the railway or on an existing or proposed Local Nature Reserve which is not capable of satisfactory mitigation.</p> <p>Residential development within Neighbourhood Centres or Neighbourhood Parades should form part of mixed use development schemes in accordance with Policies NC1 and NC2.</p> <p>Development proposals will be required to include a mix of housing, including family housing, and contribute towards the provision of necessary social infrastructure including health,</p>	
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		<p>education and community facilities, and of wider environmental improvements such as tree planting.</p> <p>Proposals for affordable housing and community-led self-build housing implemented by a Community Land Trust will be supported.</p> <p>Development will be required to be of a high design quality in accordance with Policies BE1 and BE2 and to contribute to the greening of the Neighbourhood Area in accordance with Policy GS2</p>	
PM3	Policy C1, Pg 42	<p>C1 Protection and Enhancement of Community Facilities</p> <p>The following sites and buildings are identified as community facilities:</p> <ol style="list-style-type: none"> 1. Jenner Health Centre, Stanstead Road 2. Crofton Park Library, Brockley Road 3. Ackroyd Community Centre, Ackroyd Road 4. Royal British Legion Club, Eddystone Road 5. Ewart Road Clubroom, Wastdale Road 	Agree with the modification of the text in this policy as required for clarity and to meet the basic conditions.

		<p>6. St Hilda's Church and Church Hall, Courtrai Road</p> <p>7. St Saviour's Church and Church Hall, Brockley Rise</p> <p>8. Scout Hut building and adjoining land, Courtrai Road</p> <p>9. St William of York Catholic Church and Church Hall, Brockley Park</p> <p>10. Malham Christian Centre, Malham Road</p> <p>12. Rivoli Ballroom, Brockley Road</p> <p>13. Brockley Adult Education Learning Centre, Brockley Rise</p> <p>14. Brockley Jack PH and Studio Theatre, Brockley Road 15. Honor Oak PH, St German's Road</p> <p>16. General Napier PH, Bovill Road</p> <p>17. Chandos PH, Brockley Rise</p> <p>18. Blythe Hill Tavern, Stanstead Road</p> <p>Development proposing the change of use/loss of an existing community facility, whether land or premises, currently or last used as a community facility, will not be permitted <u>supported</u></p>	
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		<p>unless it can be demonstrated that:</p> <ul style="list-style-type: none"> i. The use no longer serves the needs of the community in which it is located; ii. There is adequate alternative provision within the Neighbourhood Area which has the capacity to meet the needs of the community which the facility previously served; and iii. The applicant has been unable to secure in consultation with the local community an appropriate alternative community use and it can be demonstrated that the use of the building or land as a community facility is no longer viable. <p>Proposals for the shared use of community facilities will be supported.</p>	
PM4	Policy C2, Pg 43	<p>C2 Redevelopment of Sites in Existing Community Use</p> <p>Redevelopment or intensification of sites in existing community use may be permitted <u>supported</u> subject to development proposals making appropriate on-site provision for community facilities and where this would be in</p>	<p>Agree with the modification of the text in this policy as required for clarity and to meet the basic conditions.</p>

		<p>compliance with other policies. The following criteria will be applied:</p> <ul style="list-style-type: none">i. In exceptional circumstances, off-site provision of community facilities within the vicinity of the existing site may be acceptable where it can be demonstrated that consultation has been undertaken with the local community and this would result in improved facilities which would be accessible to and meet the needs of the community served.ii. Development will be required to be of a high design quality in accordance with Policies BE1 and BE2.iii. In the event of proposals coming forward within the plan period for redevelopment of the Jenner Health Centre site, a Development Brief will be agreed with the local planning authority prior to the submission of any planning application which includes the re-provision of existing health and community facilities.iv. Proposals will be required to satisfy the criteria set out in Policy C1.	
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PM5	Policy E1, Pg 46	<p>E1 Employment Sites and Enterprise</p> <p>1. The Malham Road Local Employment Location (LEL) will be protected for employment uses within Classes <u>E(g)</u> B4, B2 and B8, and complementary uses and development proposals will be supported which enhance employment opportunities and provide a range of accommodation including smaller units for micro-businesses and studio space <u>until such time it is considered that there is no reasonable prospect of an application coming forward for the use allocated in the plan.</u></p> <p>Where the redevelopment of existing employment space is proposed within the Malham Road LEL, development proposals will be required to demonstrate that:</p> <ul style="list-style-type: none"> i. The level of employment floorspace will be maintained or increased; ii Opportunities will be secured for local employment <u>will be promoted</u>; iii. Measures will be taken to mitigate any impacts arising from the development in terms of traffic, parking, servicing, air quality, noise and residential amenity. Residential uses will 	
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		<p>not be permitted <u>supported</u> within the Malham Road LEL</p> <p>2. Where the redevelopment of other land or buildings in existing employment use is proposed outside the Malham Road LEL, development proposals will be required to demonstrate that:</p> <ul style="list-style-type: none">i. The existing level and types of employment floorspace will be maintained;ii. Opportunities will be secured for local employment <u>will be promoted</u>;iii. There would be no unacceptable impact on residential amenity and measures will be taken to address any impacts arising from the development in terms of traffic, parking, servicing, air quality and noise. <p>3. Residential use may be supported where this comprises live-work units with ground floor workspace as part of an employment-led development scheme. There will be a presumption against the change of use to non- employment uses unless it can be demonstrated that the site has been unsuccessfully marketed for employment use and its</p>	
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		<p>continued use for employment is no longer viable.</p> <p>4. Proposals for the conversion of vacant lock-up garages to employment uses within Class B4 <u>E</u> will be supported where this would not impact on residential amenity and subject to an appropriate design and layout, parking provision and access arrangements.</p> <p>5. Proposals for redevelopment of employment sites will be required to be in accordance with Policies BE1 and BE2.</p>	
PM6	Policy E2, Pg 47	<p>E2 Malham Road Employment Regeneration Area</p> <p>The Malham Road LEL is identified as an Employment Regeneration Area and the location for an enterprise hub.</p> <p>Proposals for the regeneration of the Malham Road Local Employment Location (LEL) for employment uses in Classes B4b/e <u>E(g)</u> and B2 to provide a range of employment space (Office/ Research and Development/Light Industry) will be supported subject to <u>compliance with policies BE1 and BE2:</u></p> <p>i. appropriate design and layout, impact on amenity of adjacent residential properties, parking</p>	Agree with the modification of the text in this policy as required for clarity and to meet the basic conditions.

		<p>provision including access arrangements and streetscape improvements and management.</p> <p>ii. Any proposals involving the intensification of employment uses will be required to include measures to mitigate any impacts arising from development in terms of traffic, parking, servicing, air quality, noise and on residential amenity and to improve the environmental quality of the area access arrangements and streetscape improvements and management.</p> <p>iii. Any Proposals involving the intensification of employment uses will be required to include measures to mitigate impacts on residential amenity and to improve the environmental quality of the area for redevelopment of the Malham Road LEL will be required to form part of an overall masterplan for the area and to be in accordance with policies BE1 and BE2.</p> <p><u>The development of a masterplan is strongly encouraged for any proposals for the redevelopment of the Malham Road</u></p>	
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		<u>LEL</u>	
PM7	Policy NC1, Pg 49	<p>NC1 Protection and Enhancement of Crofton Park and Honor Oak Park Neighbourhood Centres</p> <p>1. The change of use of retail units within Crofton Park and Honor Oak Park Neighbourhood Centres (as defined in Figure 6) will not be permitted <u>supported</u> unless it can be demonstrated that the unit has been vacant for a significant period and has been unsuccessfully marketed for a period of 12 months for retail use, and retail use within Class A1, A2 and A3 <u>E (a), E (b) or E (c)</u> is unviable.</p> <p>2. Where it can be demonstrated that continued retail use within Class A1, A2 and A3 <u>E (a), E (b) or E (c)</u> is unviable, proposals for the change of use of vacant retail units to provide co-working space for small start-up businesses will be supported subject to an appropriate shop front design and the retention of an active building frontage. <u>Where planning permission is required</u> Change of use of ground floor retail premises to residential will not normally be permitted <u>supported</u>.</p>	Agree with the modification of the text in this policy as required for clarity and to meet the basic conditions.

		<p>3. The redevelopment of inappropriate uses in the neighbourhood centres which are not identified as main town centre uses in the NPPF (annex 2) and have a negative impact on amenity will be supported. Development should include an active town centre use at ground floor with residential or office use on upper floors.</p> <p>4. Development will be required to <u>should</u> preserve or enhance the character of the Local Neighbourhood Centres as mixed retail areas with a diverse range of shops and businesses. This will be achieved by <u>and will be supported where:</u></p> <ul style="list-style-type: none">i. The control of <u>Signage</u>, adverts and forecourt developments to respect and be sympathetic to the character of the area;ii. They <u>Increasing</u> the range of retail outlets, food/drink outlets and commercial premises;iii. Contributions to <u>They include</u> public realm improvements which enhance the character of the Centre. <p>Development proposals should be of high-quality design in</p>	
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		<p>accordance with Policies BE1, BE2 and BE3 and improve the appearance of the neighbourhood centres. Shop fronts, shutters and signs for shop fronts should be well designed and at a suitable scale, taking into account the Lewisham Shopfront Design Guide.</p>	
PM8	Policy NC2, Pg 50	<p>NC2 Protection and Enhancement of Local Neighbourhood Parades</p> <p>Planning permission for change use of retail units within Local Neighbourhood Parades (as defined in Figure 6) will not be permitted <u>supported</u> if the change of use would result in a reduction in the percentage of units falling within Class A1, A2 and A3 <u>E (a), E (b) or E (c)</u> across the whole parade, unless the unit is vacant and has been unsuccessfully marketed for retail use.</p> <p>Proposals for a change of use of a vacant retail unit to provide co-working space for small start-up businesses within Class B1a <u>E (g) (i)</u> or community uses within Class D4 <u>F2</u> may be permitted <u>supported</u>.</p> <p><u>Where planning permission is required, the</u> C <u>changes</u> of use</p>	<p>Agree with the modification of the text in this policy as required for clarity and to meet the basic conditions.</p>

		<p>of ground floor premises to residential use will only be permitted <u>supported</u> in exceptional circumstances where it is not possible to find a suitable commercial or business use for the retail unit and it has been demonstrated that the preferred uses are unviable, and where the development will be of a high design quality which will not adversely impact on the character of the frontage.</p> <p>The amalgamation of adjacent units to form larger retail units will generally be discouraged unless it can be demonstrated that the proposed use will meet local priorities and add to the vitality of the local parade.</p> <p>The redevelopment of sites in inappropriate uses along shopping parades which are not identified as main town centre uses in the NPPF (annex 2) and have a negative impact on amenity will be supported. Mixed use development will be permitted comprising retail, business, and community uses at the ground floor and residential uses on the upper floors <u>will be supported</u>. Development will be required to incorporate active frontages and improvements to the public realm on Stondon Park and Brockley Rise.</p> <p>Development proposals should be of a high quality design in</p>	
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		<p>accordance with Policies BE1 and BE2 and improve the appearance of the Local Neighbourhood Parades. Shop fronts, shutters and signs for shop fronts should be well designed and at a suitable scale taking into account the Lewisham Shopfront Design Guide.</p>	
PM9	Policy BE3, Pg 55	<p>Policy BE3 Areas of Special Local Character</p> <p>Nine areas are identified as Areas of Special Character (ASLC): Honor Oak Park, Crofton Park, Brockley Hill, Blythe Hill Fields, Brockley Hall Estate, Ewart Road Estate, Brockley Park Estate, Montem Road Estate, Segal Close (as shown in Figure 7 on page 57 and described in detail in Appendix B).</p> <p>Development within an ASLC will be required to protect and enhance the characteristics that contribute to its special local landscape, architectural and townscape distinctiveness.</p> <p>This shall be achieved by the following requirements:</p> <p>i. Development should respect and creatively respond to the features and context of the ASLC, based on an understanding of each site including its context and the surrounding</p>	<p>Agree with the modification of the text in this policy as required for clarity and to meet the basic conditions.</p>

		<p>townscape and landform;</p> <p>ii. The design of all new development should respond creatively to, and enhance, its context. Development will be required to incorporate exemplary standards of high quality design befitting each ASLC's diverse and locally distinctive built and landscape setting and its public realm context;</p> <p>iii. New development should protect and enhance important local social, cultural and heritage assets, including the distinctive landscape character of Buckthorne Cutting, and significant local views as defined in Figure 7;</p> <p>iv. Demolition of a principal building frontage facing the public realm will be resisted where the frontage is of architectural and townscape merit and contributes to the distinctiveness of the area;</p> <p>v. The existing built fabric and building features should be carefully repaired/restored with matching materials, details and workmanship. Where this is not feasible, these should be carefully replaced with matching features. Materials should be reused on site wherever possible;</p>	
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		<p>vi. Development will be required to demonstrate that opportunities have been taken to improve the character and quality of the ASLC and the way it functions.</p> <p>vii. Development proposals <u>within the Areas of Special Local Character</u> should be accompanied by a statement in proportion to the significance of <u>demonstrate how</u> the proposed development which justifies any proposed changes to the ASLC and demonstrates how it will preserve and enhance the area's character and <u>will protect the area's character and</u> distinctiveness.</p>	
PM10	Policy GS1, Pg 58	<p>Policy GS1 Protecting Green Space and Local Green Space</p> <p>Development which results in the loss of a local green space or in any harm to its character, setting, accessibility, appearance or amenity value will not be permitted. Small structures which are ancillary to and will enhance the use of these sites as local green space may be permitted.</p> <p>The following existing sites are designated as Local Green Spaces (see Figure 10):</p>	Agree with the modification of the text in this policy as required for clarity and to meet the basic conditions.

		<p>a. Crofton Park Station Community Garden</p> <p>b. Ewart Road Estate Green</p> <p>c. Dalmain Wildlife Garden, Grove Close</p> <p>d. Duncombe Hill Green</p> <p>The importance of green spaces in the Neighbourhood Plan area is demonstrated clearly by the content of the ten Projects listed and described on pages 72-73 and in Appendix A (pages 81-89). <u>Inappropriate development on any of the Local Green Spaces designated in this policy will only be supported in very special circumstances.</u></p>	
PM11	Policy GS3, Pg 60	<p>Policy GS3 Designation of the <u>The Three Peaks Green Walk</u></p> <p>The designation of a <u>A</u> local green walk (the Three Peaks Green Walk) (as shown on Figure 8 on page 61) will <u>has been identified to</u> create a green link between the hilly parks of One Tree Hill, Blythe Hill Fields and Hilly Fields, which all sit within or just outside the boundary of the HopCroft area, and</p>	Agree with the modification of the text in this policy as required for clarity and to meet the basic conditions.

		<p>improve links with the South East London Green Chain Walk.</p> <p>Streetscape and public realm improvements will be promoted along connecting streets with improved pedestrian crossings, wayfinding, tree planting and the promotion of the features of interest and views. Opportunities should be taken to improve access to green spaces and key places on the route, such as Eddystone Road footbridge.</p> <p>The Three Peaks Green Walk will improve accessibility to green spaces and connect features of interest.</p>	
PM12	Policy GS4, Pg 61	<p>Policy GS4 Protection of Sites of Importance for Nature Conservation</p> <p>Development <u>proposals</u> that would adversely impact (either directly or indirectly) <u>result in significant harm to biodiversity</u> on a designated or proposed Site of Importance for Nature Conservation (SINC), Nature Reserve or Wildlife Garden (as shown on Figure 9 page 63) <u>which cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for will not be permitted refused.</u></p>	Agree with the modification of the text in this policy as required for clarity and to meet the basic conditions.

		<p>The 'New Cross to Forest Hill' Metropolitan SINC is identified as a Nature Improvement Area and development will not be permitted <u>supported</u> which would damage the integrity of the corridor or impact on its nature conservation designation.</p> <p>Measures will be supported which would protect and enhance the distinct landscape character it affords and deliver a biodiversity 'net gain', improved public access to nature and better ecological management.</p>	
PM13	Policy T1, Pg 65	<p>Policy T1 Enhancement of Brockley Corridor</p> <p>A coordinated scheme will be developed and implemented for the <u>Proposals to improve the</u> Brockley Road Corridor which will be supported where they:</p> <ul style="list-style-type: none"> i. Create a sense of place throughout the corridor; ii. Improve pedestrian/cycling safety and movement; iii. Improve connections with nearby cycle routes; iv. Enhance public realm through green infrastructure-led improvements; 	<p>Agree with the modification of the text in this policy as required for clarity and to meet the basic conditions.</p>

		<p>v. Improve air quality along the Corridor;</p> <p>vi. Reduce the dominance of motor vehicles;</p> <p>vii. Encourage use of sustainable public transport;</p> <p>viii. Reduce traffic speeds through the creative planting and placement of green infrastructure, speed cameras and raised plateaux to create a sense of arrival in the higher footfall areas. Ease bus movements and simplify road layouts;</p> <p>ix. Ease traffic congestion;</p> <p>x. Provide new and safer pedestrian crossings;</p> <p>xi. Achieve improvements to the pedestrian environment, including increasing the amount of space for pedestrians around public transport facilities and in local neighbourhood centres and parades;</p> <p>xii. Substantial greening of the corridor, including boulevard planting at 7-10m intervals of medium to large street trees which are in keeping with the scale of the roadway and pavement between buildings;</p>	
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		<p>xiii. Create attractive ‘gateways’ into the Neighbourhood Plan area at Crofton Park and Brockley Rise/Stanstead Road;</p> <p>xiv. Provide parking bays in appropriate locations, with provision for car clubs and electric charging points;</p> <p>xv. Involve Transport for London and the London Borough of Lewisham with the local community in developing proposals;</p> <p>xvi. Require new development in the Brockley Corridor to incorporate improvements to the streetscape and make an appropriate financial contribution to the implementation of improvements in accordance with Policy T1.</p> <p><u>The involvement of Transport for London and the London Borough of Lewisham together with the local community in developing proposals is encouraged.</u></p>	
PM14	Policy T2, Pg 66	<p>Policy T2 Pedestrians</p> <p><u>Where appropriate, Ddevelopment will be required to improve pedestrian access in the Neighbourhood Plan area. Schemes will be required to <u>Proposals will be</u></u></p>	<p>Agree with the modification of the text in this policy as required for clarity and to meet the basic conditions.</p>

		<p><u>supported where they:</u></p> <p>i. Provide safe pavements, giving the maximum possible space to pedestrians. This may require buildings to be set back from the back edge of pavement to allow for pavement widening in appropriate locations;</p> <p>ii. Contribute to new and improved pedestrian crossings on the Brockley Corridor and other principal roads, with safer sightlines at junctions;</p> <p>iii. Improve accessibility for disabled people and those with push chairs;</p> <p>iv. Increase the amount of space for pedestrians around public transport facilities;</p> <p>v. Improve the existing network of footpaths in the area and wayfinding signs;</p> <p>vi. Contribute to the provision of new walking routes such as the Three Peaks Green Walk.</p>	
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PM15	Policy T3, Pg 66	<p>Policy T3 Cyclists</p> <p><u>Where appropriate</u> Ddevelopment will be required to promote improved provision for cycling throughout the Neighbourhood Area and to encourage cycling. In order to achieve this, new development will be required to <u>supported where they:</u></p> <ul style="list-style-type: none"> i. Contribute to the improvement of existing cycle lanes and paths, including the Brockley Corridor, with safer surfaces and sightlines; ii. Contribute to the provision of safe and well-designated cycle routes and signage; iii. Contribute to the provision of new bicycle stands in the local neighbourhood centres and parades and at stations; iv. Provide appropriate bicycle storage and facilities for cyclists in residential and commercial development. 	
PM16	Policy HW1, Pg 69	Policy HW1 Managing Flood Risk	Agree with the modification of the text in this policy as

		<p>Developments in or adjacent to areas at risk of surface water flooding must <u>Proposals should</u> demonstrate that they will not increase flood risk <u>on or off site</u>, and will be <u>Where</u> required to contribute to surface water flood risk mitigation in the area. This will need to be reflected through the inclusion of a positive statement within the a site specific Flood Risk Assessment (FRA) for the site that sets out how this will be delivered <u>should be provided in accordance with national policy which demonstrates that the proposal is protected from flooding and that there is no increase in risk for any third parties over the lifetime of the development (include an allowance for climate change).</u></p> <p>Where required, new developments should incorporate sustainable urban drainage systems (SuDs) unless there are practical or viability reasons for not doing so. SuDs will be required to provide habitat, amenity and water quality benefits in addition to attenuation of flow, and information will be required to be submitted in outline and full planning applications to demonstrate that SuDs can be accommodated within the proposed development. Parking spaces and driveways associated with new development will be required to have permeable surfaces. The paving over of front gardens</p>	required for clarity and to meet the basic conditions.
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		with impermeable materials will be discouraged and will not be permitted where planning permission is required.	
PM17	Policy D1, Pg 71	<p>Policy D1 Community Infrastructure Levy Priorities</p> <p>The Neighbourhood Plan identifies the following main priority areas for the use of Community Infrastructure Levy and if applicable Section 106 funding in the Neighbourhood Area:</p> <ul style="list-style-type: none"> i. Enhancement of community facilities ii. Improved educational facilities in the area, including nurseries iii. Support for local businesses and enterprise iv. Improvements to the Neighbourhood Local Centres and Parades including street furniture, signs and pavements v. Schemes providing improved facilities for pedestrians and cyclists vi. Improvements to existing pedestrian and cycle routes 	Recommendation accepted Policy removed and text moved to main body of text within the plan.

		<p>including improvement to bridges over railway lines</p> <p>vii. Improvements to existing parks and green spaces and provision of new public green spaces and nature reserves</p> <p>viii. Additional tree planting and measures to green the area</p>	
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