

Strategic Environmental Assessment Updated Screening Opinion:

Grove Park Neighbourhood Plan

Grove Park Neighbourhood Plan Forum

December 2018

Quality information

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Grove Park Neighbourhood Plan Forum

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1. Introduction

This SEA Screening Statement has been prepared in relation to the Grove Park Neighbourhood Plan by AECOM.

The purpose of the Screening Statement is to set out a screening opinion in relation to whether a Strategic Environmental Assessment (SEA) process is required to accompany the development of the Grove Park Neighbourhood Plan (GPNP). The Screening Statement has been provided to the statutory consultation bodies for SEA (Historic England, the Environment Agency and Natural England) for their opinion.

SEA is a systematic process undertaken to evaluate the likely significant environmental effects of plans. The requirement for SEA in England was introduced in 2004 through the Environmental Assessment of Plans and Programmes Regulation 2004 ('The SEA Regulations'), which transposed the European SEA Directive (2001/42/EC).

One of the 'Basic Conditions' that a Neighbourhood Plan is tested against is whether the making of the Neighbourhood Plan is compatible with European Union obligations, including obligations under the SEA Directive. Neighbourhood Plans only require SEA where they are likely to lead to significant environmental effects. To decide whether a proposed Neighbourhood Plan is likely to have significant environmental effects, it should be screened against the criteria set out in Annex 2 of the SEA Directive.

Where it is determined that the Neighbourhood Plan is unlikely to have significant environmental effects (and, accordingly, does not require SEA), a statement of reasons for this determination should be prepared and published for consultation with the statutory consultation bodies (Natural England, the Environment Agency and Historic England). Where a Neighbourhood Plan is likely to have a significant effect on the environment an SEA process must be carried out.

This Screening Statement therefore provides a screening opinion as to whether the GPNP is likely to lead to significant environment effects, and as such requires an SEA process. In this context it presents the following:

- Details and context of the Neighbourhood Plan, including its scope and likely content, its relationship with the Lewisham Local Plan and the key environmental constraints in the vicinity of the Neighbourhood Plan area (**Chapter 2**)
- A discussion of potential significant environmental effects of the Neighbourhood Plan and their significance (**Chapter 3**); and
- A summary of the screening opinion (**Chapter 4**).

Statutory environmental bodies for SEA are subsequently invited to provide their comments through the template included in **Chapter 5**.

2. Context for the Neighbourhood Plan

Key information relating to the Neighbourhood Plan is presented in Table 2.1.

Table 2.1: Key information relating to the Grove Park Neighbourhood Plan

Name of Qualifying Body	Grove Park Neighbourhood Forum
Title of the Plan	Grove Park Neighbourhood Plan (GPNP)
Timescale	The Neighbourhood Plan covers a 15 year period from 2018–2033.
Purpose, aims and objectives	<p>The GPNP identifies a number of key goals for the Neighbourhood Plan, which have been grouped as follows:</p> <ul style="list-style-type: none"> • “Embracing Our Heritage” • “A Destination At Last” • “A Neighbourhood to be Proud Of” • “A Community Spirited Neighbourhood” • “A Place Called Home” • “A Thriving Micro-Enterprise Hotspot” • “A Country Walk in the City Through a Linear Urban National Park” • “Be Connected” • “A Sustainable Healthy Place” <p>Policies to achieve these key goals are presented under nine strategic aims. These are:</p> <ul style="list-style-type: none"> • Protection of Heritage Assets • Renewal of Grove Park Centre • Quality of Built Environment • Thriving Community Spaces and Facilities • Quality Housing • Employment and Enterprises • Sustainable Transport • Natural Environment • Sustainable Healthy Environment
Plan contact	<p>Stephen Kenny, Grove Park Neighbourhood Forum</p> <p>stephen@seenyc.org</p>
Area covered by the Plan	<p>The Neighbourhood Plan covers a designated area of approximately 239 hectares within the London Borough of Lewisham in south east London.</p> <p>It covers the entire Grove Park ward as well as parts of Downham and Whitefoot wards.</p> <p>The boundary of the Neighbourhood Plan area is presented in Figure 2.1 below.</p>

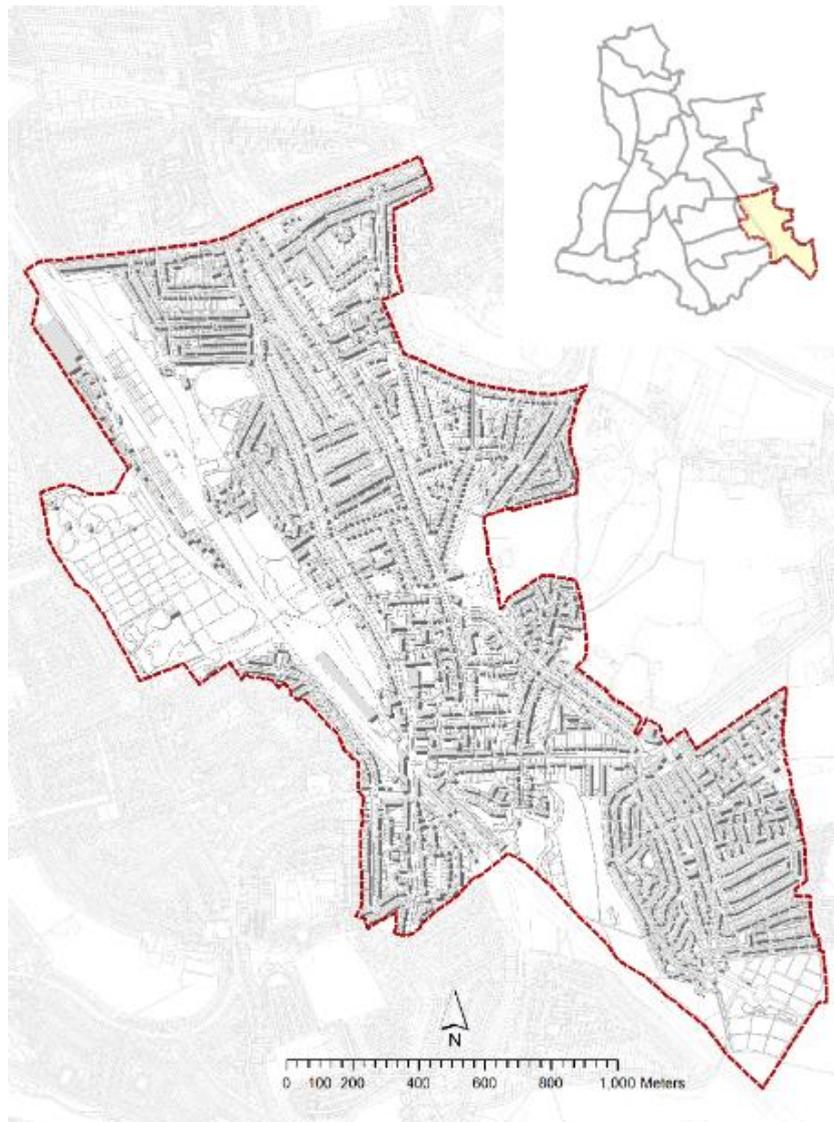


Figure 2.1: Grove Park Neighbourhood Plan area

Further context for the Neighbourhood Plan, including the key environmental constraints in the Neighbourhood Plan area, is presented in Table 2.2.

Table 2.2: Further context relating to the Grove Park Neighbourhood Plan

Local Plan context for the Neighbourhood Plan	<p>The current Local Plan comprises the Lewisham Local Development Framework (LDF). This incorporates the Core Strategy, which was adopted in June 2011, the Site Allocations Local Plan (adopted June 2013), and the Development Management Local Plan (adopted November 2014).</p> <p>Grove Park is classified by the LDF as an “<i>Area of Stability and Managed Change</i>”. In this context, Spatial Strategy Policy 5 of the Core Strategy deals with Grove Park and has an objective to deliver “<i>quality living environments supported by a network of local services and facilities</i>”. This is supported by a number of other statements that seek to ensure that any new development protects or enhances a variety of local services and facilities.</p> <p>Grove Park is one of five Local Neighbourhood Centres in Lewisham, covered by Core Strategy Policy 6 and Development Management Policy 15. It is also the centre that is furthest away from any other. It is defined as “<i>A centre that serves a localised catchment often most accessible by walking and cycling and typically contains mostly convenience goods and other services</i>”. The key objective is to “<i>protect local shopping facilities from change of use or redevelopment where there is an economic demand for such services; in the neighbourhood local centres and parades, change of use and contraction of the shopping facilities will be considered if evidence is established that there is no economic prospect of such uses continuing</i>”.</p> <p>The site of the former dairies, which was allocated through the Site Allocations Local Plan as SA39, has since been delivered, consisting of residential accommodation.</p> <p>Lewisham Borough Council is now in the process preparing a new Local Plan, with initial ‘Regulation 18’ consultation undertaken.</p>
What are the key components of the Neighbourhood Plan?	<p>The GPNP sets out site specific policies. They include policies for one housing site, three mixed use housing-led sites, two sites for community provision, one mixed use community/employment site, one employment site and one mixed use site for housing and community facilities.</p> <p>The GPNP also sets out a range of ambitions with regards to bringing abandoned buildings back into use and intensification of existing buildings’ footprints, as well as the regeneration and renewal of the town centre.</p> <p>In total there are nine site allocations, these are outlined as:</p> <ul style="list-style-type: none"> • SA1 Vacant land, Lions Close (greenfield): Depending on layout it can accommodate between 10 two storey houses or between 24-40 apartments if a denser scheme is built • SA2 Cleared Land on Grove Park Road (brownfield): The site is proposed for housing or as part of a mixed use development scheme. • SA3 Bus Waiting Area & Vacant Land at Rear (brownfield): The site is proposed for mixed-use development with retail units for local businesses on the ground floors fronting Baring road and flats or offices above • SA4 Lewisham Adult Education Centre (brownfield): Subject to the relocation and re -provision of the existing adult education facilities prior to or in tandem with this development, the redevelopment of the Adult Education Centre will be permitted for a range of town centre uses including residential and employment. • SA5 The Ringway Centre (brownfield): This site is to remain as a community hub, with renewed buildings and the gateway to the nature trail and outdoor learning Camp Nesbit site and a link to the proposed Urban National Park. • SA6 The Grove Park Library (brownfield): this site is to remain in Community Use. Any re development of the building will need to remain within the existing building footprint. • SA7 Grove Park Youth Club, Marvels Lane (brownfield): It is proposed that the site becomes an Enterprise Hub / Media Lab in line with the community’s vision. • SA8 Land to rear of Baring Hall Hotel (brownfield): Proposed for retail and employment use, in line with the adjacent use of the Pub. • SA10 W.G. Grace Site and Curtilage (brownfield): Subject to the suitable re -provision of community facilities within the area, the site would be suitable for housing with incorporation of community facilities.

Are there any sensitive receptors within or in close proximity to the Neighbourhood Plan area?

A key determinant of whether effects are likely to be significant is the sensitivity of the asset affected. In this context, the more environmentally sensitive a location, the more likely it is that potential environmental effects from a plan will be significant.

The NPPG provides guidance on this topic through providing a list of sites and areas which should be deemed as 'sensitive areas' for the purposes of environmental assessment.¹

These comprise:

- Sites of Special Scientific Interest (SSSI);
- Natura 2000 sites;
- National Parks;
- Areas of Outstanding Natural Beauty;
- World Heritage Sites; and
- Scheduled Monuments².

In the context of the NPPG, there are no sensitive areas within the GPNP area. The Neighbourhood Plan area is also not within the setting or within potential areas of impact relating to these sensitive areas (including SSSI Impact Risk Zones).

In terms of other key environmental assets (i.e. those which are not defined as 'sensitive areas' by the NPPG) these include in the Neighbourhood Plan area:

- Three Grade II listed buildings, including:
 - A Drinking Trough on Harland Road
 - Telephone Kiosk at the corner of Burnt Ash Hill
 - Baring Hall Hotel and associated stable block
 - Grove Park Cemetery, which is a Grade II listed Registered Park and Garden
 - Three locally listed heritage assets
 - A locally designated Site of Importance for Nature Conservation covers the railway sidings
 - Burnt Ash Pond Local Nature Reserve, comprising a small pond of biodiversity value
 - The Grove Park Nature Reserve (not designated as a Local or National Nature Reserve), comprising largely woodland habitat with mixed species including ash, oak, hornbeam, horse chestnut, lime and poplar.
-

¹ I.e. those sites and areas that should be considered 'sensitive' for the purposes of screening projects for Environmental Impact Assessment.

² <http://planningguidance.planningportal.gov.uk/blog/guidance/environmental-impact-assessment/screening-schedule-2-projects/interpretation-of-project-categories/>

3. Screening assessment

Table 3.1 discusses the significance of the potential environmental effects of the Grove Park Neighbourhood Plan, and their likely significance.

Table 3.1: Potential environmental effects of the Grove Park Neighbourhood Plan and their significance

SEA Topic	Discussion of potential effects and their significance	Is there the potential for a significant effect (Yes/No)?
Biodiversity, flora and fauna	<p>No biodiversity sites in the Neighbourhood Plan area are deemed as 'sensitive areas' as defined by the NPPG. Furthermore, the GPNP area is not within relevant Impact Risk Zones of SSSIs present in the wider vicinity.</p> <p>Due to their location, none of the sites considered for potential allocations through the Neighbourhood Plan have the potential to affect the ecological value of the key biodiversity assets in the Neighbourhood Plan area, including the SINC covering the railway sidings, the two nature reserves present in the Neighbourhood Plan area or ecological networks. Similarly renewal proposed for the town centre is unlikely to significant impact these assets.</p> <p>In terms of potential mitigation measures, a key facet of the evolving plan is the enhancement of green infrastructure networks in the GPNP area. This will help limit effects on biodiversity and support biodiversity improvements. In light of this evidence, effects on biodiversity are <u>unlikely to be significant</u>.</p>	No
Population and human health	<p>The GPNP sets out a range of policies which have an explicit focus on improving the quality of life of residents, including improving the public realm, for accessibility to services and facilities, and improving accessibility via active transport modes. Whilst the benefits which arise for residents from a well-designed Neighbourhood Plan have the potential to be wide-ranging, these are <u>not deemed to be significant</u> with regards to the SEA Directive and its requirements.</p>	No
Soil	<p>The GPNP area is situated in the built up area of Greater London. As such, there are no areas of the best and most versatile agricultural land present within the GPNP area. Furthermore, only one of the ten site allocations is located on previously undeveloped land. As such, the effect on soil resources is <u>deemed to be insignificant</u> with regards to the SEA Directive and its requirements.</p>	No
Water	<p>Development arising as a result of the GPNP may lead to an increase in the population of the GPNP area and create an associated increase in water demand. However, in the context of water management within London, the wider population pressures on London, and with regard to the SEA Directive and its requirements, the effect on water resources is <u>deemed to be insignificant</u>.</p>	No
Air	<p>The GPNP area is not located within one of the wider borough's six Air Quality Management Areas, and in terms of the context of Lewisham and Greater London, any increase in congestion - or alternatively - improvements to traffic flow created by the GPNP, are unlikely to be significant. Therefore with regard to the SEA Directive and its requirements the effect the effect on air is <u>deemed to be insignificant</u></p>	No

SEA Topic	Discussion of potential effects and their significance	Is there the potential for a significant effect (Yes/No)?
Climatic factors	<p>In terms of climate change mitigation, the vision and objectives of the plan actively seek to encourage sustainable modes of transport and discourage private car use. This will help limit potential increases in greenhouse gas emissions from transport that may arise as a result of the plan. Furthermore, the plan contains policies aimed to encourage change adaptation; whilst the proposed areas of development are not within Flood Zone 3, statutory requirements (including the requirements of the NPPF) will ensure that flood risk is addressed through new development proposals. Both climate change mitigation and adaptation will be also supported by the GPNP's focus on enhancing green infrastructure and biodiversity. Given the size of the GPNP area in the context of Lewisham and Greater London, the nature and magnitude of these effects are <u>unlikely to be significant</u> with regard to the SEA Directive.</p>	No
Material assets	<p>The Neighbourhood Plan may lead to small increases in the GPNP area's waste management requirements. No mineral sites are likely to be affected as a result of the GPNP. Potential increases in waste as a result of the GPNP are likely to be limited. Effects are likely to be further limited by statutory requirements regarding waste management. Due to their limited magnitude, effects are therefore <u>unlikely to be significant</u> in the context of the SEA Directive.</p>	No

SEA Topic	Discussion of potential effects and their significance	Is there the potential for a significant effect (Yes/No)?
Cultural heritage	<p>No historic environment assets in the GPNP area are deemed as 'sensitive areas' by the NPPG. There are however three Grade II listed buildings within the GPNP area and a Grade II listed Registered Park and Garden. There are also a limited number of locally listed structures.</p> <p>One allocation (SA8) has the potential to have impacts on the setting of the Grade II listed Baring Hall Hotel, which is located on the corner of Baring Road and Downham Way. This allocation seeks to facilitate the provision of the underused rear car parking/storage space for a market square and community event space, offering weekend or regular market stalls. These proposals are however unlikely to affect the fabric of the listed building. Given the nature, scale and relative lack of permanence of the proposals, which seek to revitalise the car park area for community uses, this allocation has the potential to support the ongoing rejuvenation of this key heritage asset, and support its setting. Policy SA8 also specifically seeks to "<i>respect the setting of the detached and Grade II listed Baring Hall Hotel</i>" and "<i>...future developments should not obscure the heritage asset allowing it to be viewed in the round. (if permanent structures are proposed)</i>". Significant negative effects are therefore not anticipated as a result of this allocation.</p> <p>Otherwise, due to their location and lack of proximity, none of the other sites considered for potential allocations by the Neighbourhood Plan have the potential to affect the fabric and/or setting of these heritage assets. Regeneration, renewal and intensification of the town centre promoted by the Neighbourhood Plan is also unlikely to significant affect these assets.</p> <p>Similarly, key assets located outside of the GPNP area (for example the scheduled monument Eltham Palace, which is located over 1.2km from the Neighbourhood Plan area), are unlikely to be adversely affected by the GPNP due to the distance of proposed development areas from the sites and the unlikelihood of their settings being affected. More broadly, negative effects on the historic environment are likely to be limited by the GPNP's focus on protecting heritage assets and enhancing the townscape of the area. This includes through specific policy approaches which seek to limit the impacts of densification on the townscape and setting of the historic environment of the area.</p> <p>Therefore, negative effects are <u>unlikely to be significant</u> in the context of the SEA Directive.</p>	No
Landscape / Townscape	<p>Although the development of the proposed sites has the potential to affect the townscape character of the GPNP area (both positively and negatively), there are no townscape designations located within the GPNP area. Furthermore, development may not necessarily be harmful to the townscape character of the GPNP area and may contribute positively overall to it. The GPNP also has a focus on conserving and enhancing heritage assets which contribute positively towards the townscape. This will help to minimise any negative effects of development. Therefore, effects are <u>unlikely to be significant</u> in the context of the SEA Directive.</p>	No

4. Summary of screening determination

This screening determination has considered whether the Grove Park Neighbourhood Plan (GPNP) is likely to lead to significant environmental effects in conjunction with Directive 2001/42/EC, the 'SEA Directive' and accompanying regulations.

The determination has considered a number of potential environmental effects that may arise as a result of the GPNP as a result of site allocations. Whilst some limited environmental effects have the potential to take place as a result of the GPNP, including in relation to the majority of the SEA 'topics', it is considered that these are unlikely to be significant in the context of the SEA Directive.

This includes due to:

- the relative lack of sensitivity of the Neighbourhood Plan area in relation to key environmental considerations; and
- the location of the sites considered through the GPNP process for allocation in relation to the environmental constraints which are present in the Neighbourhood Plan area.

In addition a key element of the Neighbourhood Plan's vision and objectives and emerging policies is to limit potential environmental effects and to bring benefits for quality of life of the Neighbourhood Plan area's residents.

For these reasons, it is considered that the GPNP is not subject to the requirements of Directive 2001/42/EC, the 'SEA Directive' and associated regulations. As such, **an SEA process meeting the requirements of the SEA Regulations is not deemed to be required to accompany the development of the GPNP.**

5. Statutory environmental body responses

Date: 06 July 2018
Our ref: 250150
Your ref: SEA Screening for the Grove Park NDP



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Dear Mr Chisholm-Batten

SEA Screening Statement: Grove Park Neighbourhood Plan, London

Thank you for your consultation on the above dated and received by Natural England on 14th June 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Request: Strategic Environmental Assessment

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans in light of the SEA Directive is contained within the National Planning Practice Guidance¹. The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Sharon Jenkins
Consultations Team



Historic England

Nick Chisolm-Batten
Associate, Policy and Appraisal
AECOM

By email: nick.chisholm-batten@aecom.com

Telephone 0207 973 3717

7 January 2019

Dear Mr Chisolm-Batten

SA-SEA Screening for Draft Neighbourhood Development Plan for Grove Park

Thank you for the opportunity to comment on the Screening Opinion for the above Neighbourhood Development Plan, which has been sent to Historic England as one of the three consultation bodies set out in Stage 4 of the SEA Screening Procedure (for compliance with the SEA Directive and the 2004 Regulations). As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of local planning.

Historic England has reviewed your request for a screening opinion to determine whether the revised Grove Park NDP is likely to have significant environmental effects and therefore require a Strategic Environmental Assessment.

On the basis of this information provided we agree with the assessment set out in Draft SEA Screening Report, prepared by AECOM for the London Borough of Lewisham that the proposed Neighbourhood Plan does not set out policies likely to have sufficient significant (detrimental) environmental impacts likely to require full SEA.

If however there are any aspects of the Draft Plan which you consider would benefit from further consideration by Historic England please do not hesitate to contact us.



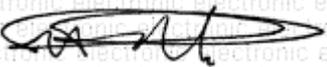
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Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



It must be noted that this advice does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment. We trust this advice is of assistance in the preparation of your scoping opinion.

Yours sincerely,



Richard Parish

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Our ref: SL/2007/101451/SE-13/SC1

Your ref: Email

Date: 24/08/2018

nick.chisholm-batten@aecom.com

Dear Nick Chisholm-Batten,

Grove Park Neighbourhood Plan: Strategic Environmental Assessment Screening Statement

Thank you for consulting the Environment Agency on the above. We have reviewed the Grove Park Neighbourhood Plan and SEA Screening Report submitted and wish to respond as follows:

Neighbourhood Plan and SEA Directive

The National Planning Practice Guidance on the assessment of Neighbourhood Plans highlights three issues that may require the production of a SEA:

- A neighbourhood plan allocates sites for development
- The neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- The neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

The SEA Directive sets criteria for determining the likely significance effects. They are a combination of:

- The magnitude of the plan's effects, including the degree to which the plan sets a framework for projects, the degree to which it influences other plans, and environmental problems relevant to the plan.
- The sensitivity of the receiving environment, including the value and vulnerability of the area, exceeded environmental quality standards, and effects on designated areas or landscapes.
- Effect characteristics, including probability, duration, frequency, reversibility, cumulative effects, transboundary effects, risks to human health or the environment, and the magnitude and spatial extent of the effects.

Statement of reasons for the SEA determination

We consider all the environmental matters within our remit have been considered by the emerging neighbourhood plan. Overall the plan provides positive environmental improvements. We agree that the Neighbourhood Plan's vision and objectives and emerging policies is to limit potential environmental effects and to bring benefits for quality of life of the area residents.

We welcome proposals to improve and link green spaces to local residents and wider population and visitors. Providing new and attractive green grid style development, improving entrance ways and knowledge of parks, enhancing and possible extension of the existing green spaces, would be welcome development. We support the following policies and measures:

- Policy GI4: Enhance Green Infrastructure Provision along Key Public Realm Routes.
- The nature improvements along Quaggy River and proposals to naturalise the rest of the stretch within the neighbourhood, remove the culverts or concrete channels to manage flooding and improve water quality.
- Natural flood management measures to help us to increase society's resilience to floods. They can be cost-effective, reduce flood risk to people and property, and help to protect and improve water, land and biodiversity - our top business priorities
- Policy SE3: Alleviating Flood Risk. However, flood risk cannot be stopped entirely and therefore the focus should be on reducing the risk. The plan should seek flood risk management opportunities and to reduce the causes and impacts of flooding. We welcome the use of sustainable drainage systems in developments.
- Policy SE1: Incorporation of Climate Adaptation Measures. New Development in Grove Park should address climate adaptation at all scales, from the building fabric through to the public realm.
- Policy SE2: Improving Air Quality which is in line with the NPPF. However the Environment Agency have a limited role on air quality in planning.

We are therefore in agreement with the findings of the SEA Screening Statement that the final Grove Park Neighbourhood Plan is unlikely to have any significant environmental effects and a full Strategic Environmental Assessment will not be required.

Please do not hesitate to contact me should you wish to discuss this further.

Yours sincerely,

Charles Muriithi, MRTPI
Planning Specialist

Kent and South London

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