



# Basic Conditions Report

Crofton Park and Honor Oak Park Neighbourhood Plan  
(HopCroft Plan) 2017-2027

September 2018



## Acknowledgements

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This draft plan has also been made possible by the dedication of the Neighbourhood Forum Steering Group who have devoted many hours of volunteer time in making it happen.

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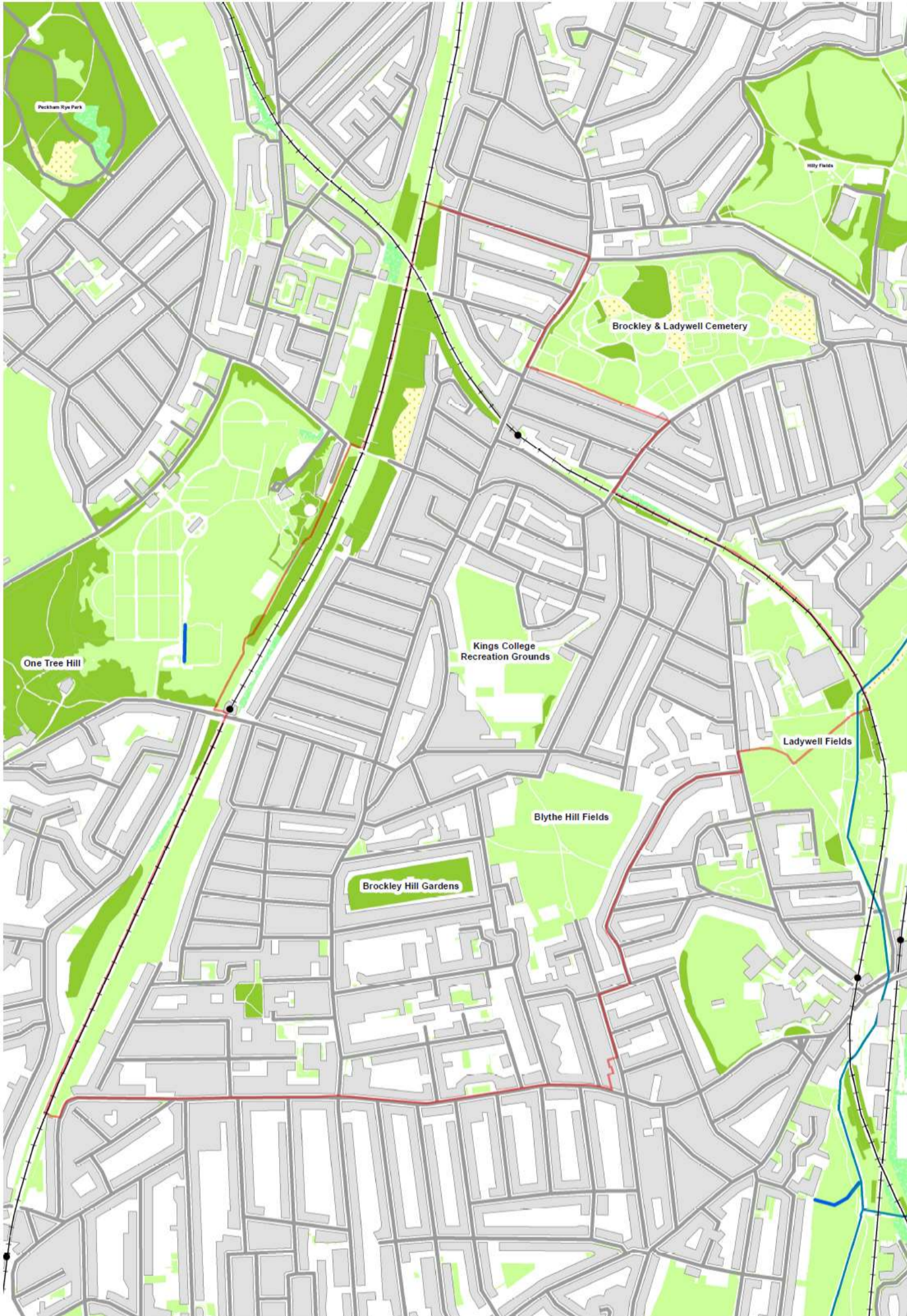


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# 1 Introduction

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## 1.1 Background

Like other parts of London, Crofton Park and Honor Oak Park is facing pressures for change and development. If this is to be addressed in a way which benefits the people who live and work here, it must respond to the existing character of the area and the future needs of the community.

The Neighbourhood Plan provides the opportunity for the community to come together to shape development and growth of the area; protecting and enhancing what is good and improving those parts which need it. The Crofton Park and Honor Oak Park Neighbourhood Plan (The HopCroft Neighbourhood Plan) has been prepared by the Crofton Park and Honor Oak Park Neighbourhood Forum (the HopCroft Forum) which was designated by the Mayor of Lewisham in July 2014 and is made up of people living and working within and in close proximity to the designated boundary. The area covered by the Plan corresponds to the boundary of the Crofton Park Ward and is shown on Figure 1.

The HopCroft Neighbourhood Plan has been developed within the context of national, strategic and local planning policy and the overriding objective of promoting sustainable development. It has been informed by community engagement, consultation and research undertaken by the Neighbourhood Forum and the evidence base documents. The Neighbourhood Plan outlines a strategy for the Neighbourhood Area and sets out planning policies and other related actions to shape the neighbourhood in the period up to 2027 and contribute to the achievement of sustainable development.

The Plan covers the ten year period 2017-2027 and is for the benefit of people who will live and work in the area. It must therefore reflect the aspirations and views of the local community and have broad support. The draft Neighbourhood Plan has been prepared following extensive analysis of the area and consultation with the local community by the HopCroft Forum. It has addressed the comments raised by the local community at the various engagement events which took place in the Spring/Summer of 2015 and the responses received during consultation on the draft Neighbourhood Plan between October 2016 and January 2017.

Following public consultation and any subsequent amendments to the draft Plan to address comments received, the final Neighbourhood Plan will be submitted to the London Borough of Lewisham who will appoint an independent inspector to examine the Plan. If the Plan is approved by the examiner, the Neighbourhood Plan will be subject to a local referendum and if successful will be brought into legal force by Lewisham Council as the local planning authority. Following approval, the Neighbourhood Plan will have the same legal status as the council's Local Development Plan and become part of the statutory development plan. Any development that requires planning consent will need to comply with the Neighbourhood Plan along with local and national planning policies.

In submitting the draft Neighbourhood Plan to LB Lewisham, the legislation requires a number of other documents to be submitted with the Neighbourhood Plan. One of these is a 'basic conditions statement.' Only a neighbourhood plan that meets each of the 'basic conditions' can be put to a referendum and, if successful, be used to assist in the determination of planning applications. The basic conditions statement must set out how our Neighbourhood Plan meets the requirements of each basic condition and other legal tests. It is our opportunity to clearly set out how the Neighbourhood Plan meets the legal tests and should therefore proceed to referendum. It will be used by both the independent examiner and LB Lewisham to help them decide whether or not our plan meets the basic conditions.

## 1.2 What are the basic conditions?

The right for communities to prepare Neighbourhood Plans was established by Government in the Localism Act 2011, which was accompanied by the Neighbourhood Planning Regulations 2012. As a result, Neighbourhood Plans are required to meet a number of basic conditions which are detailed within Schedule 4B of the 1990 Planning Act, as inserted by the provisions of Schedule 10 of the Localism Act.

There are five basic conditions that are relevant to a neighbourhood plan. These are:

- having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- the 'making' of the neighbourhood plan contributes to the achievement of sustainable development

- the 'making' of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- the 'making' of the neighbourhood plan does not breach, and is otherwise compatible with EU obligations
- prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan

The prescribed condition is that the 'making' of the neighbourhood plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2012) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007) (either alone or in combination with other plans or projects).

### 1.3 What are the legal requirements?

There are five prescribed legal requirements for a neighbourhood plan.

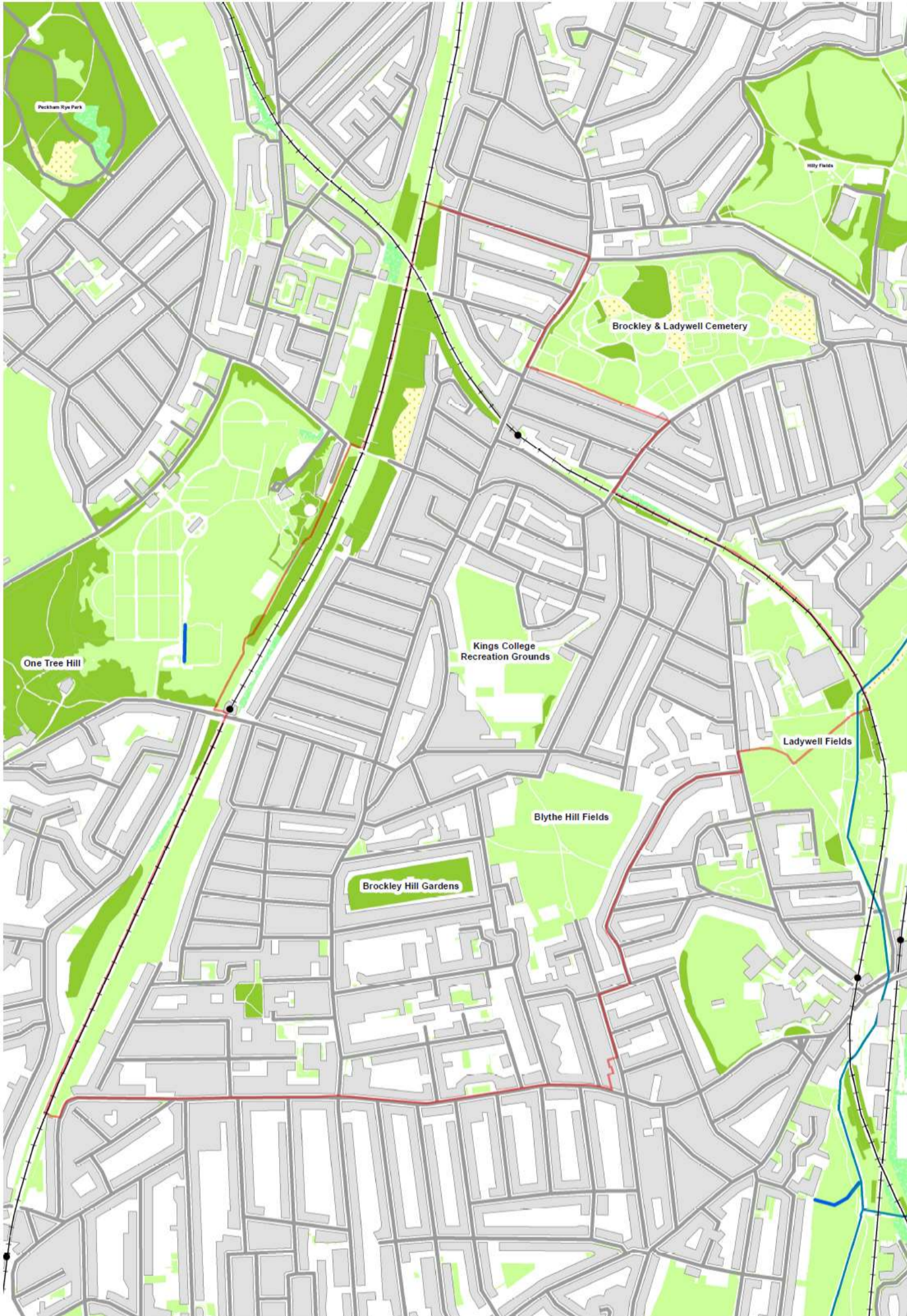
- The plan is being submitted by a qualifying body. In a neighbourhood area that covers the whole or any part of the area of a parish / town council only a parish / town council can submit the neighbourhood plan. If the plan is for an area that includes the whole or part of the area of another parish or town council (a multi-parish plan), consent must be obtained from all of the parish / town councils whose area is included. This could take the form of a written consent form. Elsewhere the plan must be submitted by a designated neighbourhood forum.
- The draft neighbourhood plan sets out policies in relation to the development and use of land in the whole or any part of a neighbourhood area. A neighbourhood plan must include land use planning policies that can be used in the determination of planning applications. It must also relate to a designated neighbourhood area. The statement needs to confirm these two matters, clearly stating which designated neighbourhood area the draft plan relates to.
- The proposed neighbourhood plan states the period in which it is to have effect. This should be clearly shown on the front of the plan and confirmation of the period should also be included within the basic conditions statement.
- The policies do not relate to excluded development. For example county matters (mineral extraction and waste development) and Nationally Significant Infrastructure Projects
- The proposed neighbourhood plan does not relate to more than one neighbourhood area. You cannot submit a neighbourhood plan that relates to more than one neighbourhood area and there can only be one neighbourhood plan in force for each neighbourhood area.

### 1.4 Structure of the Basic Conditions Statement

This document explains how the HopCroft Neighbourhood Plan taken as a whole and the policies (including any policies that allocate site/s for development) meet the requirements of each of the basic conditions and other legal tests. It is structured as follows:

- Section 2: sets out how the Neighbourhood Plan has had regard to national planning policies and advice.
- Section 3: explains how the 'making' of the neighbourhood plan contributes to the achievement of sustainable development.
- Section 4: explains how the 'making' of the Neighbourhood Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority.
- Section 5: explains how the 'making' of the Neighbourhood Plan does not breach, and is otherwise compatible with EU obligations.
- Section 6: confirms how the prescribed conditions are met in relation to the Neighbourhood Plan and prescribed matters have been complied with in connection with the proposal for the Neighbourhood Plan





**Figure 1: Boundary of area covered by Honor Oak Park and Crofton Park Neighbourhood Plan**



## 2 Conformity with National Policy and Guidance

### 2.1 Introduction

There is an obligation for any Neighbourhood Plan to have regard to the National Planning Policy Framework (NPPF).

Introduced in 2012 the National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. Critically, it established a 'presumption in favour of sustainable development' unless there are policies which provide a specific reason for refusing development relating to areas or assets of particular importance. It provides a framework within which local people and their accountable local authorities can produce their own distinctive local and neighbourhood plans which reflect the needs and priorities of the community. The NPPF also stipulates that, where appropriate, the plans must reflect and promote relevant EU obligations and statutory requirements. Principally, the NPPF stipulates that any planned development is sustainable and achieves improvements in in the environment, economy and wellbeing of people.

The draft revised National Planning Policy Framework was published for consultation in March 2018 and incorporates policy proposals previously consulted on in the Housing White Paper and the 'Planning for the Right Homes in the Right Places' consultation. The presumption in favour of sustainable development remains at the heart of the Framework but there is a stronger focus on improving the supply of new homes.

**The HopCroft Plan promotes sustainable development in line with the NPPF together with improvements to the environment, economy and wellbeing of people in the Neighbourhood Area. It has been prepared having full regard to national policies and advice.**

### 2.2 Core Principles

The NPPF sets out a set of core land-use planning principles which underpin this Neighbourhood Plan. Table 1 sets out how the HopCroft Neighbourhood Plan and the policies and actions set out in it satisfy these core principles.

NPPF Principle	Satisfied?	How?	Neighbourhood Plan Policies
Planning should be plan-led and local people should be empowered to shape their surroundings, through the development of neighbourhood plans setting out a positive vision for the future of the area. Plans should be based on joint working and co-operation and should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency	✓	The draft Neighbourhood Plan has been prepared following extensive analysis of the area and consultation with the local community by the HopCroft Forum. It has addressed the comments raised by the local community at the various engagement events which took place in the Spring/Summer of 2015 and the responses received during consultation on the draft Neighbourhood Plan. It includes land use planning policies and actions which are in conformity with national, strategic and local planning policies and provides a clear and practical framework within which decisions on planning applications can be made. The Neighbourhood Forum has worked closely with the local planning authority at each stage of preparation of the plan.	All
Take account of the different roles and character of different areas and promote the vitality of urban areas	✓	A detailed assessment has been undertaken of the neighbourhood area which is set out in the evidence base documents. The issues and options identified from our assessment of existing conditions and consultation with the local community have provided the basis for the overall strategy and objectives for and the development of planning policies and related actions. The Neighbourhood Plan seeks to protect the character and vitality of the neighbourhood area through the protection and enhancement of neighbourhood centres; the protection and enhancement of community facilities; the designation of areas of	G1 C1 E1 NC1, NC2, NC3 BE1, BE2, BE3 GS1, GS2, GS3



		special local character and to ensure new development complements and enhances local character and identity	
Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy)	✓	A key objective of the Neighbourhood Plan is to create a healthier living environment and improve the well-being of residents through measures to improve air quality and address impacts of climate change. This is reflected in policies to promote sustainable transport (walking, cycling and use of public transport), greening of the neighbourhood, sustainable design with a high level of resource efficiency and resilience to climate change, appropriate conversion and reuse of existing buildings and measure to improve air quality. The plan includes the designation of a new local green walk (The Three Peaks Green Walk).	BE1, BE2 GS1, GS2, GS3 T1, T2, T3, T4 HW2
Contribute to conserving and enhancing the natural environment and reducing pollution	✓	A core objective is to conserve and enhance the natural environment. The Neighbourhood Plan seeks to protect green spaces and promotes the provision of new green infrastructure. Development will be required to provide a measure of biodiversity and an overall 'net gain' in biodiversity for the site and to make provision for new tree planting and landscaping and protect trees in good health that contribute to the character of the Area, individual streetscapes and green spaces. Development that would adversely impact on a designated or proposed Site of Importance for Nature Conservation (SINC) Nature Reserve and/or Wildlife Garden will not be permitted. The 'New Cross to Forest Hill' Metropolitan SINC is identified as a Nature Improvement Area.	G1 H1, H2 BE1 GS1, GS2, GS3, GS4 HW1, HW2
Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value	✓	There is a shortage of larger development sites in the neighbourhood area and a key objective is to make best use of land to meet local priorities whilst protecting the environment and character of the area and access to local services and jobs. The Neighbourhood Plan encourages the effective use of land by reusing land that has been previously developed at Whitbread Road and Beecroft Mews and is currently underutilised. This will promote the efficient use of land.	G1 H1, H2 C2 E1 E2 NC1, NC2, NC3 BE1, BE2, BE3 GS1, GS2, GS4 HW1, HW2
Promote mixed use developments, and encourage multiple benefits from the use of land in urban areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production)	✓	There is a shortage of larger development sites in the neighbourhood area and the scale and type of development will generally be smaller scale than in other parts of the borough. The Neighbourhood Plan encourages residential development on suitable sites and provides an appropriate policy framework for dealing with proposals which may come forward on unallocated sites. A mix of uses is essential to the promotion of sustainable development and many existing uses are susceptible to pressures for redevelopment. The Neighbourhood Plan therefore seeks the retention and enhancement of existing community facilities and the protection and enhancement of neighbourhood centres and local neighbourhood parades and employment sites. The plan promotes multi-functional green infrastructure and encourages shared use of community facilities and co-working spaces.	G1 H1, H2 E1 NC1, NC2 GS2



Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations	✓	The neighbourhood plan seeks to protect and enhance the area's built heritage, particularly its arts and crafts, Victorian and Edwardian townscape character and buildings of architectural or historic merit and to ensure new development responds positively to the character and quality of its surroundings. It seeks to ensure that future development creates streets that will be equally loved and cherished as the terraced streets of the past and will become heritage features of the future and to protect the special character of the area through the designation of areas of special character	G1 BE1, BE2, BE3 GS3
Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable	✓	The neighbourhood plan promotes increased use of sustainable transport modes through the provision of improved facilities for pedestrians and cyclists and promotion of improved public transport services and facilities.	G1 H1 E1, E2 NC1 GS3 T1, T2, T3, T4
Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs	✓	The neighbourhood plan seeks to improve health and wellbeing and to protect and enhance community, leisure and cultural facilities in the neighbourhood. The shared use of community, sports and cultural facilities is supported. Policy GS1 also seeks to improve the existing limited access to private open spaces and sports provision, such as Kings College Sports Ground and Brockley Hill Park. Improved access to these areas will support the health and wellbeing of residents by enhancing access to sport and recreation, facilitating improvements in levels of physical activity.	C1, C2 NC1, NC2 GS1, GS2, GS3 HW1, HW2

**Table 1 Conformity of HopCroft Neighbourhood Plan with national policy and guidance**

## 2.3 Policy Themes

The Neighbourhood Area is defined in the Lewisham Development Plan as an Area of Stability and Managed Change. This means our area is not identified as somewhere for major development or regeneration, rather the scale and type of development is expected to be smaller and to respect the surrounding residential character. The overall objective is to promote sustainable development in the Neighbourhood Plan area.

The Neighbourhood Plan has however built on the key policy themes and guidance set out in the NPPF as follows:

- 1. Build a strong and competitive economy** – the Neighbourhood Plan seeks to create a strong independent/home-grown local economy and to support local businesses, Small and Medium- sized Enterprises (SMEs) and creative enterprises thrive in vibrant local centres and parades and employment hubs; to create vibrant neighbourhood local centres and local shopping parades which meet the needs of residents and to regenerate the area around Brockley Rise/Stanstead Road Parade (Policies E1, E2, E3 and SA2)
- 2. Ensuring the vitality of town centres** - the Neighbourhood Plan promotes and supports vibrant neighbourhood centres and local neighbourhood parades to provide a range of retail facilities and other local services for the communities they serve (Policies NC1, NC2 and NC3)
- 3. Promoting sustainable transport-** the Neighbourhood Plan promotes the use of sustainable transport- walking, cycling and public transport as an alternative to the car through the provision of new, improved and safer pedestrian and cycle routes and support for improved public transport services and facilities (T1, T2, T3 and T4)
- 4. Delivering a wide choice of high quality homes-** the neighbourhood area does not have the capacity for significant residential development. The Neighbourhood Plan therefore seeks to make the best use of to deliver a range of homes including affordable housing, whilst ensuring that this does not conflict with other policies in the Plan. it is possible that larger sites may come forward as 'windfalls' during the plan period in response to the demand for housing in the area. This is likely to involve the proposed redevelopment of sites which are currently in other uses or subject to existing planning designations or require the intensification of



land in existing residential use. Policy H2 encourages residential development on suitable sites and provides an appropriate policy framework for dealing with proposals which may come forward on unallocated sites. (Policies G1, H1 and H2).

5. **Requiring good design-** the NPPF places good design at the heart of sustainable development. All new development will be required to be of a high quality of design which complements and enhances the local character and identity of the Neighbourhood Area. Development proposals for alterations and extensions to existing residential and commercial properties, including roof extensions, will be required to be of a high, site specific, and sensitive design quality, complementing the form, setting, period, architectural characteristics, and detailing of the original buildings and context, including external features such as chimneys, and porches. The Neighbourhood Plan designates a number of areas of special local character where particular attention will be required (Policies BE1, BE2 and BE3).
6. **Promoting healthy communities-** the objective of supporting a strong, vibrant, healthy and inclusive community sits at the heart of this Neighbourhood Plan. The shared vision and policies set out in the plan have been developed in consultation with the community. The Neighbourhood Plan seeks to ensure the needs of the community are met for local services, social, recreational and cultural facilities and that development meets local needs for housing and jobs. It seeks to protect and enhance existing community facilities and to create an attractive and safe place to live (Policies G1, H1, H2, C1, C2, E1, NC1, NC2, NC3, GS1, GS2, GS3, GS4, T1, T2, T3 and T4).
7. **Meeting the challenge of climate change and flooding-** the Neighbourhood Plan includes policies which require new development to manage flood risk, including the use of sustainable urban drainage systems where required and to incorporate measures to improve air quality. Measures are supported to encourage walking, cycling and the use of public transport. New development is required to promote principles of healthy and sustainable design with a high level of resource efficiency and resilience to climate change, with consideration being given to the incorporation of features such as Electric Vehicle charging points, living roofs, green walls, rainwater harvesting, passive solar design and zero carbon buildings. New development will also be required to contribute to the greening of the neighbourhood (Policies HW1, HW2, T1, T2, T3, T4, BE1, GS2 and GS3).
8. **Conserving and enhancing the natural environment-** the Neighbourhood Plan includes policies to protect and enhance the natural environment and to minimise impacts on biodiversity and to provide net gains in biodiversity where possible. A Nature Improvement Area is designated within the neighbourhood area. Policies to promote sustainable transport and measures to improve air quality will assist in reducing pollution (Policies GS1, GS2, GS3, GS4, T1, T2, T3, T4, HW1 and HW2).
9. **Conserving and enhancing the historic environment-** the Neighbourhood Plan seeks to protect and enhance the historic environment by ensuring a high quality of design which complements and enhances the local character and identity of the Neighbourhood Area. Development proposals for alterations and extensions to existing residential and commercial properties, including roof extensions, will be required to be of a high, site specific, and sensitive design quality, complementing the form, setting, period, architectural characteristics, and detailing of the original buildings and context, including external features such as chimneys, and porches. The Neighbourhood Plan designates a number of areas of special local character where particular attention will be required (Policies BE1, BE2 and BE3).



## 3 Conformity with Strategic and Local Planning Policy

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### 3.1 Introduction

The Neighbourhood Plan will form part of the Local Development Plan and must conform with other national, regional and local planning policies. Together with other planning policy documents, it will provide the framework for the determination of planning applications and contribute to the achievement of sustainable development. Development of the Neighbourhood Plan seeks to promote sustainable development in conformity with national, strategic and local planning policy objectives. The Neighbourhood Plan does not duplicate these policies but rather seeks to reinforce their application at the neighbourhood level. It supports and upholds the general principle that the strategic policies are concerned with and provides an additional level of detail and/or a distinct local approach to that set out in the strategic policies without undermining those policies.

**This section demonstrates that the Neighbourhood Plan is in general conformity with strategic and local planning policies.**

### 3.2 The London Plan

The London Plan 2011 (as amended) details the overarching development strategy for the whole of London. The London Plan has defined 'Regeneration Areas', being those with the highest deprivation as well as areas of 'Opportunity and Intensification'. In these areas, the London Plan outlines its strategies and policies for development that must be adhered to. The Neighbourhood Area for Crofton/Honor Oak Park falls outside of those areas demarcated for Lewisham Council, which are Catford and New Cross & Deptford Opportunity Areas.

A draft new London Plan was published by the Mayor for consultation in December 2017. The consultation period ended on Friday 2 March. The draft new London Plan is underpinned by the concept of Good Growth – growth that is socially and economically inclusive and environmentally sustainable and focused on sustainable development. A primary objective is to increase the supply of affordable homes in London. GLA officers are currently registering all representations received and preparing a report which will summarise the main issues. In accordance with section 338(3) of the GLA Act, the Secretary of State has appointed a Panel to conduct an examination in public ("EIP") of the London Plan. The Mayor may suggest changes to the draft London Plan in response to the representations received, issues and questions raised by the Panel, or discussions at the EIP.

The vision set out in the current London Plan over the years to 2036 – and beyond is that London should:

**excel among global cities – expanding opportunities** for all its people and enterprises, **achieving the highest environmental standards and quality of life** and **leading the world** in its approach to tackling the urban challenges of the 21st century, particularly that of climate change. Achieving this vision will mean making sure London makes the most of the benefits of the energy, dynamism and diversity that characterise the city and its people; embraces change while promoting its heritage, neighbourhoods and identity; and values responsibility, compassion and citizenship.

The Neighbourhood Plan is consistent with this vision. In particular, the plan reinforces strategic policies by:

- Contributing to building a strong, responsive and competitive economy;
- Supporting a strong, vibrant and healthy community;
- Creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being;
- Contributing to protecting and enhancing our natural, built and historic environment;
- Helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

This high level, over-arching vision is supported by six detailed objectives which embody the concept of sustainable development. The Neighbourhood Plan is aligned with these principles:

- 1. A city that meets the challenges of economic and population growth** in ways that ensure a sustainable, good and improving quality of life and sufficient high quality homes and neighbourhoods for all Londoners and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes. *The Neighbourhood Plan seeks to accommodate new housing development including affordable housing; create a strong independent/home-grown local economy and to support local businesses, Small and Medium- sized Enterprises (SMEs) and creative enterprises thrive in vibrant local centre and parades and employment hubs; create vibrant neighbourhood local centres and local shopping parades which*

meet the needs of residents and to regenerate the south western part of the neighbourhood which is within the bottom 20% of most deprived areas in the UK (Policies G1, H1, H2, E1, E2, NC1, NC2 and NC3)

**2. An internationally competitive and successful city** with a strong and diverse economy and an entrepreneurial spirit that benefit all Londoners and all parts of London; a city which is at the leading edge of innovation and research and which is comfortable with – and makes the most of – its rich heritage and cultural resources. *The Neighbourhood Plan seeks to promote a diverse economy including the provision of workspace suitable for SMEs; the protection of local employment sites; the enhancement of local centres and neighbourhood parades and the protection and enhancement of its built heritage and cultural resources (Policies G1, C1, C2, E1, E2, NC1, NC2, NC3, BE1 and BE2).*

**3. A city of diverse, strong, secure and accessible neighbourhoods** to which Londoners feel attached, which provide all of its residents, workers, visitors and students – whatever their origin, background, age or status – with opportunities to realise and express their potential and a high quality environment for individuals to enjoy, live together and thrive. *The Neighbourhood Plan seeks to create a strong, safe and inclusive neighbourhood where people of all ages will have access to good quality services, green spaces and leisure and cultural facilities (Policies G1, C1, C2, GS1, GS2, GS3, HW1 and HW2).*

**4. A city that delights the senses** and takes care over its buildings and streets, having the best of modern architecture while also making the most of London's built heritage, and which makes the most of and extends its wealth of open and green spaces, natural environments and waterways, realising their potential for improving Londoners' health, welfare and development. The Neighbourhood Plan seeks to make best use of its assets and protect and enhance the built and natural environment (Policies G1, C1, C2, BE1, BE2, BE3, GS1, GS2, GS3 and GS4)

**5. A city that becomes a world leader in improving the environment** locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively. The Neighbourhood Plan seeks to address issues of climate change and to enhance biodiversity, for example by the designation of Nature Improvement Area (GS1, GS2, GS3, GS4, T1, T2, T3, T4, HW1 and HW2).

**6. A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities** with an efficient and effective transport system which actively encourages more walking and cycling. *The Neighbourhood Plan promotes sustainable transport in order to reduce use of the car. It makes provision for improved walking and cycle routes and a new local green walk (The Three Peaks Walk) which forms part of a wider network in SE London (Policies T1, T2, T3 and T4).*

The London Plan identifies a number of Opportunity Areas and Intensification Areas which have significant capacity for new housing, commercial and other development linked to existing or potential improvements to public transport access. The Neighbourhood Plan area is not located with or adjacent to any of these designated areas.

### 3.3 Lewisham Council's Local Development Plan

Lewisham Council's current development plan is made up of the following documents:

- Core Strategy (adopted in 2011): establishes the borough-wide spatial policy context
- Site Allocations document (adopted in 2013): identifies the locations and sites for specific types of development needed to implement the Core Strategy's vision
- Development Management Local Plan (adopted in 2014): sets out policies for the management of development and determination of planning applications

Lewisham Council is currently preparing a new Local Plan. It will be the key planning document for the borough and will set out how new homes and related infrastructure will be delivered from 2018–33. Stage 1 of the consultation closed on 20 November. Lewisham's next consultation round on the Local Plan is expected late 2018–19.

The Lewisham Development Plan provides the planning policy framework for determining planning applications in the area. Figure 3 sets out the planning policy context for the Neighbourhood Plan area which is provided by the Borough Local Plan. This shows the designations in the Borough Local Plan and the areas that are protected from development, such as urban green space, Sites of Nature Conservation Importance, the Defined Local Employment Location at Malham Road and an Area of Archaeological Priority. In our Plan, these borough-wide aims are fully applied.



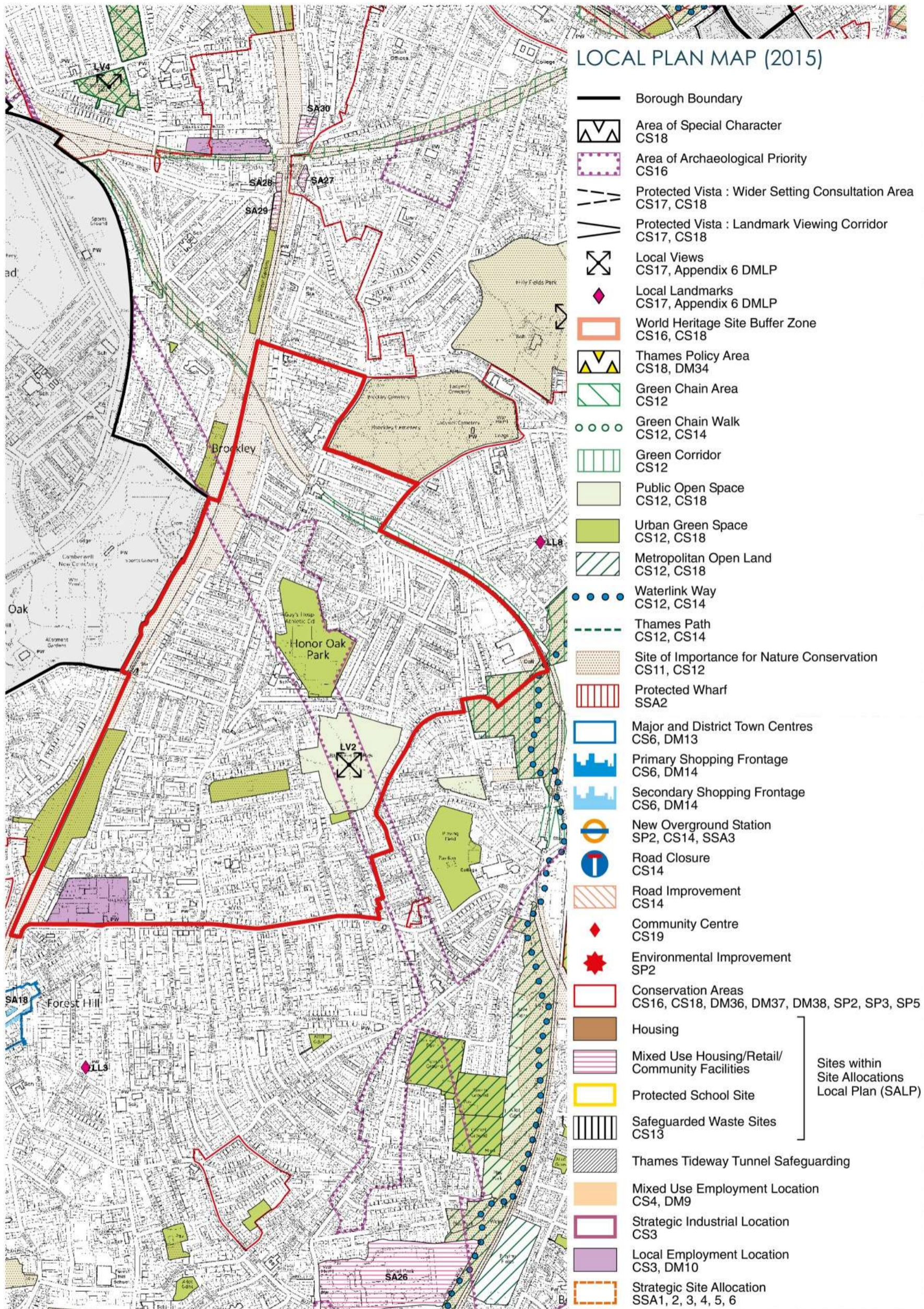


Figure 2: Extract from Lewisham Policies Map (2015). Source: <http://www.cartogold.co.uk/lewisham/map.htm>



The Neighbourhood Area is defined as an Area of Stability and Managed Change where the scale and type of development is expected to be smaller scale and to respect the surrounding residential character. Spatial Policy 5 states that Areas of Stability and Managed Change will provide quality living environments supported by a network of local services and facilities.

The Neighbourhood Plan reflects the priorities for the area set out in Spatial Policy 5. It seeks to provide a quality living environment supported by a network of local services and facilities and to:

- ensure that any new development protects or enhances the character and historic significance of the area (Policies C1, BE1, BE2 and BE3);
- ensure the retention and protection of shopping areas and smaller local parades that contribute to local day to day retail needs and employment (Policies NC1, NC2 and NC3);
- support the locally significant employment areas including maintaining a Local Employment Location (LEL) at Malham Road (Policies E1 and E2);
- Seek improvements to walking and cycling environment to improve access to local services and public transport provision (Policies GS3, T1, T2, T3 and T4);
- Contribute to addressing deprivation issues (Policies G1, H1, H2, C1, C2, E1, E2, NC3, GS1 and GS3).

The conformity of the Neighbourhood Plan with other policies in The Lewisham Local Development Framework is summarised in Table 2.



**Table 2: Compliance with Strategic Policies in the Lewisham Local Development Plan**

Policy Number	Policy requirements	Compliance of Neighbourhood Plan with Strategic Policies
<b>Lewisham Core Strategy</b>		
<b>Spatial Policy 5 Areas of Stability and Managed Change</b>	<p>Areas of Stability and Managed Change will provide quality living environments supported by a network of local services and facilities. The Council will</p> <ul style="list-style-type: none"> <li>i. ensure that any new development protects or enhances the quality of Lewisham’s character, and historic significance particularly within conservation areas</li> <li>ii. ensure the retention and protection of shopping areas that contribute to local day-to-day retail needs and employment by designating Crofton Park as a neighbourhood local shopping centres</li> <li>iii. protect and support smaller local parades scattered throughout the area</li> <li>iv. support locally significant employment areas scattered throughout the area including maintaining a Local Employment Location (LEL) at Malham Road</li> <li>v. seek improvements to the walking and cycling environment, in order to improve access to local services and public transport provision</li> <li>vi. contribute to improving deprivation issues through estate renewal.</li> </ul>	<p>The Neighbourhood Plan seeks to protect the character of the neighbourhood and to create a quality living environment supported by a network of local services. It seeks to improve deprivation.</p> <p>See Policy G1</p>
<b>CS Policy 1 Housing provision, mix and affordability</b>	<p>The policy states that:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Development should result in no net loss of housing</li> <li><input type="checkbox"/> The Council will seek the maximum provision of affordable housing with a strategic target for 50% affordable housing from all sources.</li> <li><input type="checkbox"/> Contributions to affordable housing will be sought on sites capable of providing 10 or more dwellings.</li> <li><input type="checkbox"/> To ensure a mixed tenure and promote mixed and balanced communities, the affordable housing component is to be provided as 70% social rented and 30% intermediate housing.</li> <li><input type="checkbox"/> The provision of family housing (3+ bedrooms) will be expected as part of any new development with 10 or more dwellings.</li> <li><input type="checkbox"/> All new housing is to be built to Lifetime Homes standards and 10% of all housing is to be wheelchair accessible or easily adapted for those using a wheelchair in accordance with London Plan policy.</li> </ul> <p>The Council will seek an appropriate mix of dwellings within a development, having regard to the following criteria:</p> <ul style="list-style-type: none"> <li>i. the physical character of the site or building and its setting</li> <li>ii. the previous or existing use of the site or building</li> <li>iii. access to private gardens or communal garden areas for family dwellings</li> <li>iv. the likely effect on demand for car parking within the area</li> <li>v. the surrounding housing mix and density of population</li> <li>vi. the location of schools, shops, open space and other infrastructure requirements</li> </ul>	<p>The Neighbourhood Plan reflects the housing objectives.</p> <p>See Policy H1</p>
<b>CS Policy 3 Strategic Industrial Locations and Local Employment Locations</b>	<p>The policy states that the Council will protect the LELs for a range of uses within the B Use Class (B1, B8 and where appropriate B2 industry) and also appropriate sui generis uses, to support the functioning of the local economy.</p>	<p>The Neighbourhood Area contains a designated Local Employment Location (LEL) (Malham Road).</p> <p>See Policies E1 and E2</p>

<p><b>CS Policy 5 Other employment locations</b></p>	<p>The policy states that:</p> <ul style="list-style-type: none"> <li>□ The Council will protect employment locations outside Strategic Industrial Locations, Local Employment Locations and Mixed Use Employment Locations.</li> <li>□ Employment land within town centres should be recommended for retention in employment use.</li> <li>□ Other uses including retail, community and residential will be supported if it can be demonstrated that site specific conditions including site accessibility, restrictions from adjacent land uses, building age, business viability, and viability of redevelopment show that the site should no longer be retained in employment use.</li> </ul>	<p>The Neighbourhood Plan seeks to give stronger protection to local employment locations and to encourage employment uses in neighbourhood local centres and parades if retail use is no longer viable.</p> <p>See Policies E1,NC1,NC2 and NC3</p>
<p><b>CS Policy 6 Retail hierarchy and location of retail development</b></p>	<p>The policy states that the Council will:</p> <ul style="list-style-type: none"> <li>□ 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</li> <li>□ support the retail hierarchy through farmers' and street markets within the town centres, local centres and parades.</li> </ul>	<p>The Neighbourhood Area seeks to protect and enhance the Neighbourhood Local Centres and designated retail parades to ensure access to local services and to create active community hubs.</p> <p>See Policies NC1, NC2 and NC3</p>
<p><b>CS Policy 12 Open space and environmental</b></p>	<p>The policy states that the Council will conserve nature, green the public realm and provide opportunities for sport, recreation, leisure and well-being by:</p> <ul style="list-style-type: none"> <li>□ protecting the character, historic interest and amenity of, and within, open spaces, as well as the effects of development outside their boundaries</li> <li>□ protecting Metropolitan Open Land, open space, urban green space and green corridors from inappropriate built development to ensure there is no adverse effect on their use, management, amenity or enjoyment</li> <li>□ maintaining and improving the publicly accessible open space network, such as the South East London Green Chain, the East London Green Grid, parks and gardens, playing fields, nature reserves, allotments, community gardens, amenity green space, cemeteries and churchyards as well as smaller open spaces that have townscape quality</li> <li>□ improving the quality of accessibility to existing open space by public transport, cycle and foot</li> <li>□ preserving or enhancing the local biodiversity and geological conservation interests in accordance with national and regional policy, in the form of PPS9 and the London Plan by designating Sites of Importance for Nature Conservation</li> <li>□ protecting trees, including street trees, and preventing the loss of trees of amenity value, and replacing trees where loss does occur</li> <li>□ seeking new on-site provision of public and private open space as part of new development</li> <li>□ improve accessibility to existing areas of public open space in identified areas of open space deficiency</li> <li>□ seeking exemplary design for new, and improvements to existing open space, in the context of the local character and its distinctive historical qualities</li> <li>□ maximising opportunities for sport and recreation through well-designed and managed spaces, which take into account the Mayor's Children and Young People's play space requirements in a safe environment</li> <li>□ promoting living roofs and walls</li> <li>□ promoting and supporting local food growing and urban agriculture</li> </ul>	<p>The Neighbourhood Area contains a number of open spaces. Blythe Hill Fields is designated as Public Open Space; the Kings College Sports Ground, Garthorne Road Nature Reserve and the Brockley Hill Private Gardens are designated as Urban Green Space; the railway line area between Crofton Park and Ladywell Fields as a Green Corridor and the railway embankment area alongside the Croydon line as Site of Nature Conservation Importance (SINC).</p> <p>The Neighbourhood Plan seeks to protect and enhance green spaces and increase the protection of local green spaces not covered by strategic policies. It also promotes improved walking routes and links between green spaces and greening of the neighbourhood.</p> <p>See Policies GS1, GS2 and GS3</p>



<p><b>CS Policy 14 Sustainable movement and transport</b></p>	<p>The policy states that the access and safety of pedestrians and cyclists throughout the borough will be promoted and prioritised through the improvement of a network of high quality, connected and accessible walking and cycling routes including Waterlink Way and the South-East London to enable more effective management of traffic and improving the environment for all users, including pedestrians, cyclists and public transport users.</p>	<p>The Neighbourhood Plan promotes improved provision for walking, cycling and public transport.</p> <p>See Policies T1, T2, T3 and T4</p>
<p><b>CS Policy 15 High quality design for Lewisham</b></p>	<p>The policy states that for all development, the Council will:</p> <ul style="list-style-type: none"> <li>□ ensure highest quality design and the protection or enhancement of the historic and natural environment, which is sustainable, accessible to all, optimises the potential of sites and is sensitive to the local context and responds to local character</li> <li>□ ensure design acts to reduce crime and the fear of crime</li> <li>□ apply the housing densities as outlined in the London Plan</li> <li>□ ensure development is flexible and adaptable to change</li> <li>□ ensure any development conserves and enhances the borough's heritage assets, and the significance of their settings</li> </ul> <p>In Areas of Stability and Managed Change, the policy states that development should achieve the following design aims:</p> <ul style="list-style-type: none"> <li>□ The scale and type of development will generally be smaller scale than other parts of the borough respecting conservation areas, listed buildings and the scale of surrounding residential character.</li> <li>□ Small scale development, including infill development, will need to be designed and laid out to, complement the character of surrounding development, provide suitable residential accommodation with a high level of amenity and provide for garden and amenity space. Any adverse impact on neighbouring amenity, conservation areas and designated and non-designated heritage assets, biodiversity or open space will need to be addressed.</li> <li>□ Redevelopment opportunities near stations may provide scope for higher density redevelopment. The primary considerations will be accessibility to public transport, local character and urban design principles which aim to establish place making as part of any redevelopment.</li> <li>□ Small household extensions and adaptations to existing housing will need to be designed to enhance the street scene, protect neighbour amenity and ensure that the living conditions proposed are satisfactory.</li> </ul>	<p>The Neighbourhood Plan supplements strategic policy by providing more locally specific guidance on protection and enhancement of the built environment and the design of new development.</p> <p>See Policy BE1 and Design Guidance accompanying the Neighbourhood Plan</p>

<p><b>CS Policy 19 Provision and maintenance of community and recreational facilities</b></p>	<p>The policy states that the Council will work with its partners to ensure a range of health, education, policing, community, leisure, arts, cultural, entertainment, sports and recreational facilities and services are provided, protected and enhanced across the borough. The work of the Lewisham Infrastructure Delivery Plan and the relevant corporate plans and strategies of partners will be used to inform provision. The Council will ensure:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> there is no net loss of facilities</li> <li><input type="checkbox"/> the needs of current and future populations arising from development are sufficiently provided for</li> <li><input type="checkbox"/> the preferred location for new uses will be in areas that are easily accessible and located within close proximity of public transport, other community facilities and services and town and local centres</li> <li><input type="checkbox"/> co-location of services and multi-use facilities are encouraged and supported</li> <li><input type="checkbox"/> a safe and secure environment is created and maintained.</li> </ul>	<p>The Neighbourhood Plan identifies community assets and seeks to ensure their protection and where possible enhancement.</p> <p>See Policies C1, C2, GS1,GS2</p>
<p><b>CS Policy 20 Delivering educational achievements, healthcare provision and promoting healthy lifestyles</b></p>	<p>The policy states that the Council will support the Primary Capital programmes to rebuild or improve all schools within the borough and the broad range of education and training opportunities provided by local groups to strengthen local skill levels. The Council will also work with its partners to:</p> <ul style="list-style-type: none"> <li>i. support the implementation of the NHS Lewisham Commissioning Strategy Plan</li> <li>I. ii. improve health and promote healthy lifestyles across the borough by: <ul style="list-style-type: none"> <li><input type="checkbox"/> exploring new ways to improve opportunities for healthy and active lifestyles</li> <li><input type="checkbox"/> ensuring that the potential health impacts of development are identified and</li> <li><input type="checkbox"/> addressed at an early stage in the planning process</li> <li><input type="checkbox"/> supporting the Lewisham University Hospital, health centres and GP surgeries</li> <li><input type="checkbox"/> reduce health inequalities across the borough.</li> </ul> </li> </ul>	<p>An underlying objective of all policies in the Neighbourhood Plan is the promotion of health and wellbeing and healthy lifestyles through the protection and enhancement of green spaces, promotion of walking and cycling and addressing issues of air quality.</p> <p>See Policies C1, C2, GS1, GS2, T2, T3, HW1, HW2</p>



## Development Management Local Plan

### DM Policy 10 Local Employment Locations (LEL)

This policy states that:

- the Council will support uses within the B Use Class and appropriate sui generis uses within a Local Employment Location.
- Permission for self-storage facilities, and larger scale storage facilities and warehouses (Use Class B8) will not be granted unless part of the development re-provides the floorspace for Small and Medium Enterprises in line with Core Strategy Policy 3 which protects Local Employment Locations for a range of business uses.
- New build premises in these locations will be required to be flexibly specified and provided with an internal fit out to an appropriate level to ensure the deliverability of the units and the long term sustainability of the employment uses. The provision of lower cost accommodation suitable for starter businesses should form part of any new scheme.
- Planning permission for the change of use of a building from business use to residential use, or other uses such as day nurseries, churches and other community facilities will not be granted due to the effect the proposal would have on the continued commercial functioning of the area as a whole and their incompatibility with the uses on the LEL.

Malham Road is designated as an LEL and subject to this policy.

Policies E1 and E2 provides more locally specific guidance

<p><b>DM Policy 15 Neighbourhood local centres</b></p>	<p>Crofton Park is designated as a neighbourhood local centre and subject to this policy. The Policy states that within designated local centres:</p> <p>The Council will require the retention of Class A1 shops, to support the provision of essential daily goods and services, and ensure a range of uses consistent with the local character to contribute to its vitality and viability for shoppers.</p> <p>A change of use to non-A1 uses will only be considered if the following criteria are satisfied:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> a high standard of design and appropriate layout is achieved, including high quality shopfronts</li> <li><input type="checkbox"/> provision of an attractive window display</li> <li><input type="checkbox"/> reasonable attempts have been made to market vacant shop units, for more than 12 months, at an appropriate rent</li> <li><input type="checkbox"/> the availability of similar alternative shopping facilities within a comfortable walking distance (approximately 400 metres or less)</li> <li><input type="checkbox"/> a balance to the number and type of units within the centre (where 40% of A1 uses are maintained)</li> <li><input type="checkbox"/> there is no harm to the amenity of adjoining properties, including that created by noise, smell, litter, and incompatible opening hours</li> <li><input type="checkbox"/> there is provision of adequate delivery arrangements and no adverse effects arising from traffic generation</li> <li><input type="checkbox"/> that adequate provision for access for people with disabilities is made, and</li> <li><input type="checkbox"/> the use would not result in adverse effects caused by crime, disorder and anti-social behaviour.</li> </ul> <p>A change of use to residential at ground floor will only be permitted:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> at the end of a row of a retail parade, but not in corner shops, in order to preserve the continuity of retail frontage, and</li> <li><input type="checkbox"/> where the design and materials of the residential frontage is of the highest quality and relate well to the proportion, scale and detailing of the entire host building, adjoining buildings and make a positive contribution to the streetscape.</li> </ul>	<p>Policy NC1 provides more locally specific guidance.</p> <p>Honor Oak Park is designated as a Local Neighbourhood Centre.</p>
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<p><b>DM Policy 16 Local shopping parades and corner shops</b></p>	<p>Honor Oak Park, Brockley Road, Ewhurst Road &amp; Crofton Park Road, Brockley Rise and Wastdale Road are designated as local shopping parades. The policy states that:</p> <p>The Council will require the retention of Class A1 shops located in a local shopping parade or operated as a corner shop in order to preserve or enhance the local character and support the provision of essential daily goods and services, unless an applicant can demonstrate a number of factors:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> the availability of similar alternative shopping facilities within a comfortable walking</li> <li><input type="checkbox"/> distance (approximately 400 metres or less)</li> <li><input type="checkbox"/> a balance to the number and type of units within the parade</li> <li><input type="checkbox"/> that reasonable attempts have been made to market vacant shop units, for more than 12 months, at an appropriate rent</li> <li><input type="checkbox"/> the replacement use will result in no harm to the amenity of adjoining properties.</li> </ul> <p>A change of use to residential at ground floor will only be permitted:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> at the end of a row of a retail parade, but not in corner shops, in order to preserve the continuity of retail frontage, and</li> <li><input type="checkbox"/> where the design and materials of the residential frontage is of the highest quality and relate well to the proportion, scale and detailing of the entire host building, adjoining buildings and make a positive contribution to the streetscape.</li> </ul>	<p>Policy NC2 and NC3 provide more locally specific guidance.</p>
<p><b>DM policy 25 Landscaping and Trees</b></p>	<p>All major development and where appropriate non-major development must retain existing trees for the most part and in the event of tree removal, replacement planting will normally be required. New and replacement tree planting must use an appropriate species that reflects the existing biodiversity in the borough.</p>	<p>Policy E2 supplements DM Policy 25</p>
<p><b>DM policy 30 Urban Design and Local Character</b></p>	<p>The Council will require all development proposals to attain a high standard of design. This applies to new buildings and for alterations and extensions to existing buildings. Development proposals will need to be compatible with and/or complement the urban typologies in the area. The retention and refurbishment of existing buildings that make a positive contribution to the environment will be encouraged and should influence the character of new development and the development of a sense of place. The policy requires a site specific design response in terms of scale, height and massing and relationship to the scale and alignment of the existing street including its building frontages.</p>	<p>Policies BE1 and BE2 provide more locally specific guidance</p> <p>Policy BE3 identifies Areas of Special Local Character</p>
<p><b>DM policy 31 Alterations and extensions to existing buildings including residential extensions</b></p>	<p>Development proposals for alterations and extensions, including roof extensions will be required to be of a high, site specific, and sensitive design quality, and respect and/or complement the form, setting, period, architectural characteristics, and detailing of the original buildings, including external features such as chimneys, and porches. High quality matching or complementary materials should be used, appropriately and sensitively in relation to the context.</p>	<p>Policy BE1 provides more locally specific guidance</p>

<p><b>DM policy 33 Infill sites, backland gardens and amenity areas</b></p>	<p>The policy states that if a site is considered suitable for development, planning permission will not be granted unless the proposed development is of the highest design quality and relates successfully and is sensitive to the existing design quality of the streetscape, and is sensitive to the setting of heritage assets. Development within street frontages and on street corners will only be permitted where they make a high quality positive contribution to an area and provide a site specific creative response to the character and issues of the street frontage typology and to the special distinctiveness of any relevant conservation area.</p>	<p>Policies BE1, BE2 and BE3 provide more locally specific guidance</p>
<p><b>DM Policy 37 Non designated heritage assets including locally listed buildings, areas of special local character</b></p>	<p>The Council will protect the local distinctiveness of the borough and development proposals affecting non-designated heritage assets should be accompanied by a heritage statement proportionate to the significance of the asset and which justifies the changes to the asset. The policy states that non-designated heritage assets may be identified during the development management process. Development in areas of special local character should sustain and enhance the characteristics that contribute to the special local spatial, architectural, townscape, landscape or archaeological distinctiveness of these areas.</p>	<p>The designation of Areas of Special Local Character is in compliance with DM Policy 37</p>



## 4 Contribution to Sustainable Development

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National, strategic and local planning policies set a clear context for the Neighbourhood Plan and the overriding importance on the promotion of sustainable development.

Contributing to the achievement of sustainable development is the core principle underpinning this Neighbourhood Plan. Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):

- making it easier for jobs to be created in cities, towns and villages
- moving from a net loss of bio-diversity to achieving net gains for nature
- replacing poor design with better design
- improving the conditions in which people live, work, travel and take leisure
- widening the choice of high quality homes

There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being;
- **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Local circumstances have been taken into account and preparation of the Neighbourhood Plan has responded to the different opportunities for achieving sustainable development. The Neighbourhood Plan will contribute to achievement of sustainable development objectives in the following ways.

- **Environment** - The Neighbourhood Plan seeks to protect and enhance the environment and green infrastructure assets; and create a healthy and safe living environment through improvements to the streetscape and public realm
- **Social** - The Neighbourhood Plan seeks to protect and where appropriate enhance community facilities in the neighbourhood for the benefit of all residents; ensure a range of housing is provided to meet local needs; make best use of development opportunities to meet local priorities
- **Economy** - The Neighbourhood Plan seeks to create a strong local independent/home-grown local economy and to support local businesses, SMEs and creative enterprises; create vibrant neighbourhood local centres and local shopping parades which meet the needs of residents; allow local businesses and creative enterprises to thrive in employment hubs

The Neighbourhood Plan policies and actions contribute individually and collectively to the achievement of sustainable development by:

- Contributing to building a strong, responsive and competitive economy;
- Supporting a strong, vibrant and healthy community;
- Creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being;
- Contributing to protecting and enhancing our natural, built and historic environment;
- Helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

The Vision is underpinned by a number of interrelated objectives which the Neighbourhood Plan seeks to achieve through policies, actions and projects. The objectives below were developed through a Vision Day Workshop held in June 2015<sup>1</sup> which identified the following key themes:

- **Healthy environment**- new and improved green infrastructure, surface water, flood risk and air quality
- **Local economy**- protection and enhancement of high streets and opportunities for small businesses
- **Regeneration** of southern part of Neighbourhood Area- Brockley Rise and Ewart Road Estate
- **Protection of built environment**- ensuring that new development is in keeping with and enhances the character of the area
- **Quality of design**- ensuring that new development is of a high design quality
- **Protection and enhancement of community facilities**- ensuring that existing community assets are protected and where possible enhanced

These objectives are summarised under the following key themes:

- Sustainable Development (over-arching theme)
- Housing
- Community Facilities
- Local Economy and Neighbourhood Centres
- Built Environment and Heritage
- Green Space
- Transport and Movement
- Health and Well-being

All of the policies in the plan contribute individually and collectively to the over-arching objective of contributing to the achievement of sustainable development and are in conformity with national, strategic and local planning policies. The contribution of the Neighbourhood Plan to the achievement of sustainable development objectives is summarised in Table 3.

Theme	Objectives	Relevant Policies
<b>Sustainable Development</b>	1. To contribute to the achievement of sustainable development in the Neighbourhood Plan area	GE1, H1, H2, SA1, C1, C2, E1, E2, NC1, NC2, NC3, BE1, BE2, BE3, GS1, GS2, GS3, GS4, T1, T2, T3, T4, HW1, HW2, D1
<b>Housing</b>	2. To ensure a range of housing is provided to meet local needs 3. To make best use of development opportunities to meet local priorities	H1, BE1 H1, BE1
<b>Community Facilities</b>	4. To protect and where appropriate enhance community facilities in the neighbourhood for everyone to benefit from and enjoy	C1, C2

<sup>1</sup> Draft Vision Workshop Outputs <http://croftonhonoroakpark.neighbourhood.space/wp-content/uploads/2015/10/Crofton-Park-and-Honor-Oak-Park-Vision-and-Objectives-Workshop-Debriefing-Report.pdf>



<b>Local Economy and Neighbourhood Centres</b>	<p>5. To create a strong independent/home-grown local economy and to support local businesses, Small and Medium- sized Enterprises (SMEs) and creative enterprises thrive in vibrant local centre a and parades and employment hubs</p> <p>6. To create vibrant neighbourhood local centres and local shopping parades which meet the needs of residents</p> <p>7. To regenerate the area around Brockley Rise/Stanstead Road Parade</p>	<p>E1, E2, NC1, NC2, NC3</p> <p>NC1, NC2</p> <p>NC3</p>
<b>Built Environment and Heritage</b>	<p>8. To protect and enhance the neighbourhood’s built heritage, particularly its arts and crafts, Victorian and Edwardian townscape character and buildings of architectural or historic merit.</p> <p>9. To ensure new development responds positively to the character and quality of its surroundings and meets sustainable building standards.</p> <p>10.To ensure future development creates streets that will be equally loved and cherished as the terraced streets of the past and will become heritage features of the future.</p> <p>11.To protect the special character of the streets around Honor Oak Park</p>	<p>BE1, BE2, BE3</p> <p>BE1, BE2</p> <p>BE1, BE2</p> <p>BE3</p>
<b>Green Space</b>	<p>12.To protect, enhance and celebrate the unique hilly parklands and access to green spaces through improved green chain wayfinding, designation of local green spaces and green infrastructure provision along the connecting routes</p> <p>13.To create a healthy, safe and attractive living environment through improvements to the streetscape and public realm along the key transport corridors including street tree planting.</p> <p>14.To contribute to conserving and enhancing the natural environment</p>	<p>GS1, GS2, GS3</p> <p>GS2, T1</p> <p>GS1,GS2, GS3, GS4, HW1, HW2</p>
<b>Transport and Movement</b>	<p>15.To seek and campaign for better transport links and facilities</p> <p>16.To enhance the Brockley Road Corridor including public realm improvements</p> <p>17.To ensure future proposals create safer opportunities for cycling and walking along the main streets.</p>	<p>T4</p> <p>T1</p> <p>T1, T2, T3</p>
<b>Health and Wellbeing</b>	<p>18.To create a healthier living environment and improve the well-being of residents through measures to improve air quality and address impacts of climate change</p>	<p>GS1, GS2, T1, HW1, HW2</p>

**Table 3: Cross tabulation of Neighbourhood objectives and relevant policies**

## 5 Compliance with EU Obligations

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### 5.1 Sustainability Appraisal (SA)

Sustainability Appraisal (SA) is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts.

SA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive 5. It also widens the scope of the assessment from focussing on environmental issues to further consider social, economic, equalities and health issues. SA is a legal requirement for Local Plans; however, a Neighbourhood Plan is not a Local Plan and SA is not therefore legally required.

Strategic Environmental Assessment is a requirement of the EU Directive on the assessment of certain plans and programmes on the environment. The requirements of this Directive have been incorporated within the Sustainability Appraisals undertaken for the Submission Drafts of the Lewisham Core Strategy and Development Management Plan. The purpose of a sustainability appraisal is to ensure that the principles of sustainable development have been considered throughout the plan making process by the integration of social, economic and environmental considerations. The sustainability appraisals demonstrate how the policies in the Lewisham Core Strategy and Development Management Plan align with sustainability objectives. As a statutory planning document that must be compliant with the strategic planning policies of Lewisham Council, the Neighbourhood Plan should also contribute to these sustainability objectives where appropriate.

#### 5.1.1 Screening assessment

The London Borough of Lewisham undertook a screening assessment (January 2017) to determine whether a full Strategic Environmental Assessment (SEA) is required in accordance with European Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations (2004). This is called a screening assessment. The need for Strategic Environmental Assessments is set out in the EU Directive 2001/42/EC (commonly referred to as the SEA Directive) and transposed into English Law by the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the SEA Regulations). Under the Directive, Neighbourhood Development Plans may require SEA but this will depend on the content of each Neighbourhood Development Plan (NDP).

As a result of the assessment, Lewisham Council considered that the HopCroft Neighbourhood Plan is likely to have significant environmental effects by virtue of containing land allocation policies and policies that extend beyond the remit of the borough Development Plan and therefore have not already been subject to a Sustainability Appraisal or SEA. It was therefore determined that the draft HopCroft Neighbourhood Plan is likely to have significant environmental effect by virtue of including policies and site allocations that extend beyond the existing borough Development Plan, and will require full SEA.

To meet this requirement, the HopCroft Plan has undergone an SA process which incorporates the requirements of the SEA Directive. This reflects the socio-economic issues which the Neighbourhood Plan seeks to address. It also reflects the desire of the Neighbourhood Forum to effectively consider health and equalities issues through the Neighbourhood Plan.

#### 5.1.2 Scoping Report

The SA has been undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). Two key procedural requirements of the SEA Regulations are that:

1. When deciding on 'the scope and level of detail of the information' which must be included in the SA Report there is a consultation with nationally designated authorities concerned with environmental issues; and
2. A report (the 'SA Report') is published for consultation alongside the Draft Plan (i.e. the draft Crofton Park and Honor Oak Park Neighbourhood Plan) that presents outcomes from the SA (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

A 'Scoping Report' prepared by Aecom (October 2017) has addressed item 1 above. It presented a suggested scope for the SA so that the designated authorities (the Environment Agency, Historic England and Natural England) could provide timely comment. The SA Scoping Report was consulted upon in October 2017. This was submitted to the statutory environmental bodies: Historic England, Natural England and the Environment Agency and was made publicly available.



An SA Framework was established as part of this scoping process to test the Neighbourhood Plan. This was based on the framework used in the Lewisham Core Strategy SA. The Plan has been through an iterative process of sustainability assessment considering the social, economic and environmental effects of the plan. This has helped avoid and mitigate any adverse environmental effects and maximise the positives through the plan's development.

### 5.1.3 Sustainability Appraisal Report

A full Sustainability Appraisal of the draft Neighbourhood Plan was conducted to inform the Pre-Submission Draft (Regulation 14) (Aecom, April 2018). This report forms part of the submission to Lewisham Council. The assessment is structured under eight sustainability "topic" headings.

The key findings of the Sustainability Appraisal are summarised in Table 4.

The assessment concluded that the current version of the HopCroft Neighbourhood Plan is likely to lead to **significant positive effects** in relation to the 'population and equalities', and 'health and wellbeing' SA themes. These benefits largely relate to the HopCroft Neighbourhood Plan's focus on enhancing the quality of life of residents and improving accessibility to high quality green infrastructure, including through the protection and enhancement of neighbourhood centres, high streets, the pedestrian network, open spaces and green networks. This will help promote a strong and cohesive community where residents have pride in their local area. This will be further reinforced by the Neighbourhood Plan's aim to enhance access to affordable, high quality housing.

The Neighbourhood Plan is also expected to lead to **significant positive effects** in relation to the 'transportation' theme, through supporting the use of sustainable transport modes, reducing issues of congestion and improving road safety.

The current version of the HopCroft Neighbourhood Plan will initiate a number of beneficial approaches regarding the 'landscape and historic environment', 'biodiversity', 'land, soil and water resources' and 'climate change' sustainability themes. However, these are not considered to be significant in the context of the SA process given the scope of the Neighbourhood Plan and the scale of proposals.

**Table 4: Summary of key findings of the Sustainability Appraisal (Aecom, April 2018)**

Sustainability Topic	Summary of SA Findings
Air Quality	<p>Existing air quality issues in the Neighbourhood Plan area are closely linked to traffic along transport corridors and key congestion points. In response to this the Neighbourhood Plan places a focus on encouraging sustainable transport uses. This will help limit the use of the private car, supporting a limitation of emissions. In this context Policy HW2 (Improving Air Quality) states that measures will be supported to promote walking, cycling and use of public transport in the area. Policies T2 (Pedestrians) and T3 (Cyclists) further require development to increase the amount of space for pedestrians around public transport facilities, and improve the existing network of the footpath and cycle networks. This will better connect the HopCroft area with surrounding communities and contribute positively towards reducing the reliance on the car for shorter journeys, with benefits for air quality and greenhouse gas emissions. Policy T4 also seeks to improve sustainable transport networks in the Neighbourhood Plan area, focusing on the capacity, quality and accessibility of public transport facilities. This policy will support rail and bus travel, and encourage uptake of these facilities, moving residents away from private car use.</p> <p>Implementation of these policy requirements will therefore have a positive effect on air quality, contributing towards reduced pollutant levels, including greenhouse gas emissions. Air quality in the HopCroft Plan area will also be supported by the policies which promote enhancements to green infrastructure (GI) networks. Policy HW 2 (Improving Air Quality) requires any proposals or development on the Brockley Corridor or Stanstead Road to incorporate measures to improve air quality such as green walls and tree planting. This is a focus for a number of policies within the Neighbourhood Plan, including Policy T1 (Enhancement of Brockley Corridor) which includes substantial greening of the Brockley Road Corridor, including boulevard planting at 7-10m intervals of medium to large street trees. Further to this, Policy G1 (Management of Development and Change) requires new development to protect and enhance open spaces and again, contribute to the greening of the area. Looking specifically at the housing site allocation Policy SA1 (Land at Whitbread Road), development is required to provide a measure of biodiversity and an overall 'net gain' in biodiversity for the site. The provision of new green space and planting and landscaping through these policies will support the dissipation and absorption of pollutants.</p>

<p>Biodiversity and Geodiversity</p>	<p>The Neighbourhood Plan will bring a range of benefits for habitats, species and ecological networks in the Neighbourhood Plan area. The housing site allocation at Whitbread Road and the Neighbourhood Employment Site allocation at Beecroft Mews are not expected to have significant effects on internationally or nationally designated nature conservation sites. There is however an area of deciduous woodland priority habitat located 150m to the west of Beecroft Mews and 60m west of Land at Whitbread Road, which falls within the locally designated site of nature conservation importance (SNCI) along the railway embankment. It is also noted that there is a further patch of woodland adjacent to the Beecroft Mews site to the east, which may provide a habitat for protected species. Nonetheless, considering the existing urban environment, and the content of the policies put forward in the Neighbourhood Plan, development of the two sites is not expected to have a significant impact on the biodiversity features present.</p> <p>In terms of development at Whitbread Road, in particular, Policy SA1 (Land at Whitbread Road), requires that a measure of biodiversity and an overall 'net gain' in biodiversity is to be provided for the site. Further to this Policy GS1 (Management of Development and Change) and GS2 (Greening the Neighbourhood) requires new development to protect and enhance open spaces and contribute to the greening of the area. Policy GS2 seeks to enhance the neighbourhood's network of GI, with a particular emphasis on improving linkages between identified biodiverse sites. The proposed greening of area will include requiring development to make provision for new tree planting and landscaping as well as protecting individual streetscapes and green spaces.</p> <p>The protection and enhancement of GI will have a positive effect on biodiversity, increasing the value of the area, providing important habitats and green corridors for plants and wildlife.</p> <p>A major asset for the area is the continuous green corridor and SNCI along the railway embankment. This wildlife site is rich in biodiversity, and is therefore protected under Policy GS1 (Protecting Green Space). This policy also precludes the loss of green space in the Neighbourhood Plan area, recognising the ecological importance of the railway embankment area between Crofton Park and Ladywell Fields, and the railway embankment area alongside the London Bridge-Croydon line. The protection of these areas will have a positive effect on biodiversity, supporting ecological networks and connectivity throughout the Neighbourhood Plan area.</p> <p>Sites are designated as Local Green Spaces through the Neighbourhood Plan. These areas are particularly valuable for nature conservation. For example, water and wildlife-friendly plants have been introduced to the Dalmian Wildlife Garden, which has in turn attracted foxes, frogs, newts and a variety of birds, supporting species richness in the area.</p>
<p>Climate Change</p>	<p>In terms of climate change mitigation, road transport is an increasingly significant contributor to greenhouse gas emissions in the HopCroft area. This is discussed under 'Air quality' in Section 5.4. The HopCroft Plan further supports climate change mitigation through promoting energy efficiency and renewable energy. In this context Policy BE1 (Design of New Development) promotes development which supports principles of healthy and sustainable design with a high level of resource efficiency and resilience to climate change. This includes requiring that development considers the incorporation of features such as Electric Vehicle charging points, passive solar design and zero carbon buildings.</p> <p>Enhancements to GI networks promote climate change mitigation through supporting carbon sequestration and promoting sustainable modes of transport; and climate change adaptation through helping to limit the effects of extreme weather events and regulating surface water run-off. The HopCroft Neighbourhood Plan's focus on the protection and enhancement of the areas GI provision through policies GS1 (Protecting Green Space), GS2 (Greening the Neighbourhood) and Policy T1 (Enhancement of Brockley Corridor) will therefore support these elements.</p> <p>Policy GS2 (Greening the Neighbourhood) requires that open space is designed to anticipate future climate change. Development will be required to consider the incorporation of features such as living roofs and green walls in new development in accordance with Policy BE1 (Design of New</p>



	<p>Development). Further to this, the paving over of front gardens with impermeable materials will be discouraged and will not be permitted where planning permission is required in accordance with Policy HW1 (Managing Flood Risk).</p> <p>In relation to flood risk in the Hopcroft Plan area the addressing of issues linked to fluvial, groundwater and surface water flooding are likely to be supported by the provisions of the NPPF. Likewise, the flood risk, SuDS and surface water flooding policies proposed through the Lewisham Development Plan would further help limit adverse effects in this regard. However Policy HW1 (Managing Flood Risk) sets out the local context to flood risk in the area through setting out provisions for limiting impacts on surface water flooding and the provision of SuDS.</p>
<p>Landscape and Historic Environment</p>	<p>A central focus of the policies proposed for the Hopcroft Neighbourhood Plan is on protecting and enhancing the quality of the public realm, supporting local distinctiveness, protecting townscape character, and supporting the conservation and enhancement of the historic environment.</p> <p>The streets of Honor Oak Park are of significant local value, contributing significantly to the neighbourhood's sense of place and are therefore defined as Areas of Special Local Character (ASLC). Policy BE3 (Areas of Special Local Character) identifies the ASLC within the Neighbourhood Plan area. In line with Policy BE3, development within an ASLC will be required to protect and enhance the characteristics that contribute to its special local architectural and townscape distinctiveness. This shall be achieved through the set of criteria identified through Policy BE3, including criteria seeking to protect and enhance important local social and cultural and heritage assets and significant local views.</p> <p>The Neighbourhood Plan recognises that much of future development will be in the form of infill, redevelopment, conversion or extension to existing buildings , and as such, seeks to ensure that local character will be protected through such development. This is in accordance with the Lewisham Borough Wide Character Study (2010), which identifies the principal building typology of the area as 'Urban Terrace' and highlights that new development should not disrupt the regularity of the street form, nor the unity of the architecture.</p> <p>The Neighbourhood Plan provides guidance on the appropriate design of new development within the Neighbourhood area through specific policies. Policy BE1 (Design of New Development) requires all new development to be of a high quality design which complements and enhances the local character and identity of the Neighbourhood Plan area. Where development is proposed adjacent to designated and non-designated heritage assets or within ASLC, new development should be "sensitively designed in accordance with the principles set out in Policy BE3 to ensure that it restores and reinforces the regularity of the street form and the unity and coherence of townscape with historic or architectural features of merit." This is further supported by Policy BE2 (Extensions and Alterations to Existing Buildings) which requires development proposals for alterations and extensions to existing properties to be of "high, site specific, and sensitive design quality, complementing the form, setting, period, architectural characteristics, and detailing of the original buildings and context". This will safeguard the heritage and townscape assets, while also promoting enhancement of local character.</p> <p>The built heritage of the area, combined with its varied and hilly topography, has a strong character, with attractive panoramic views of London's skyline. In this context landscape and townscape quality will be further supported by the GI policies, including Policy GS1 (Protecting Green Space) and Policy GS2 (Greening the Neighbourhood). Policy GS2 requires development to make provision for new tree planting and landscaping, and protects trees that contribute to the character of the area and important views.</p> <p>In terms of potential effects of the site allocations, the Whitbread Road residential site allocation is a cleared brownfield site on the edge of an existing housing estate. The site is within an urban context and would act as infill development, in keeping with the surrounding built form . As such development is not expected to have an adverse effect on the wider landscape. Similarly, the Neighbourhood Employment Site at Beecroft Mews is a brownfield site in an urban location. Development of the site is not expected to have an adverse effect on the area's landscape or townscape.</p>

	<p>With the implementation of the provisions of the policies discussed above, there is also potential for such development to support enhancements to the quality of the public realm and local distinctiveness.</p>
Land, Soil and Water Resource	<p>The Neighbourhood Plan encourages the effective use of land by reusing land that has been previously developed at Whitbread Road and Beecroft Mews and is currently underutilised. This will promote the efficient use of land.</p> <p>The focus placed on Green Space (policies GS1-GS4) and enhancements to Green Infrastructure provision in the Neighbourhood Plan area will support the quality of land and water resources, including through promoting the ability of natural processes to support soil and water quality. In this respect Policy GS2 (Greening the Neighbourhood) in particular recognises the importance of Green Infrastructure for its “biodiversity value, providing important habitats and green corridors for plants and wildlife, and for providing natural drainage.” Policy BE1 (Design of New Development) promotes development which encourages healthy and sustainable design with a high level of resource efficiency and resilience to climate change. This will help limit resource use.</p>
Population and Equalities	<p>The Neighbourhood Plan allocates one site for residential development at Land at Whitbread Road (Policy SA1). The site extends to 0.1ha and is owned by the London Borough of Lewisham. It is in a residential area and is suitable for infill development . As the site is owned by Lewisham Council, it provides the opportunity to provide a small scale community-led affordable or social housing scheme for the benefit of the community. This will contribute positively towards supporting the housing needs of the local community and promoting a high quality public realm.</p> <p>The Neighbourhood Plan further sets out through policy H1 (Housing), the type and tenure of housing to be provided in the Neighbourhood Plan area. As in other parts of London, house prices have risen significantly and there are concerns about access to affordable housing . In this context Policy H1 supports a mix of housing to meet local needs, which includes affordable housing in line with the 50% target as set out in the Lewisham Local Plan.</p> <p>The Neighbourhood Plan area contains one designated Local Neighbourhood Centre (Crofton Park) and five local neighbourhood parades (Ewhurst Road, Honor Oak Park, Brockley Rise, Brockley Road and Wastdale Road (however the Neighbourhood Plan recognises that Honor Oak Park also performs the role of a Neighbourhood Centre). A key concern for the Neighbourhood Plan area is the decline of the Neighbourhood Centres and pressures for the conversion of premises from appropriate high street uses to residential uses. Policy NC1 (Neighbourhood Centres and Parades) therefore seeks to preserve and enhance the vitality of Local Neighbourhood Centres as mixed retail areas with a diverse range of shops and businesses. This will support the longevity of the Neighbourhood Centres as attractive community/retail areas which meet residents’ needs.</p> <p>Policy NC3 (Brockley Rise/Stanstead Road Local Improvement Area) promotes regeneration at Brockley Rise/Stanstead Road Local Parade. This will enable businesses to benefit from local regeneration initiatives which would bring vacant units back into use and help improve the quality of frontages and the street environment. This is likely to have a positive effect on the local community, bringing buildings back into use again for social and economic purposes.</p> <p>Policy E1 (Employment Sites and Enterprise) and E2 (Malham Road Employment Regeneration Area) seek to protect and enhance existing employment sites . Malham Road Employment Regeneration Area provides an opportunity for regeneration and possible intensification to achieve employment growth in the Neighbourhood Plan area. Additional employment provision is also to be secured through policy SA2 (Beecroft Mews Neighbourhood Employment Site), which will make a positive contribution to the availability of business space in the area, particularly for small and medium sized enterprises (SMEs). This will support the diversification of the local economy, and increase employment opportunities for local residents.</p> <p>In terms of Equalities, the development of Land at Whitbread Road (Policy SA1) will have positive effects in relation to a number of the protected groups identified in the Equality Act 2010. The site is proposed to deliver</p>

high quality housing with equality of access to local employment opportunities, a range of community services and facilities including health, education, retail, culture, community meeting spaces, and multi-functional open space.

Policy H1 (Housing) considers, the housing needs of different sectors within the community . This is to ensure that the right size and type of new homes are provided within the Neighbourhood Plan area to meet the needs of existing and future residents and to ensure the creation of mixed and balanced communities. In particular, Policy H1 will contribute positively towards meeting the requirements of people with support needs (including older people and those with disabilities).

The Neighbourhood Plan area has a strong underlying social infrastructure, with dedicated community groups in the area providing activities and outreach initiatives for local residents . Policy C1 (Protection and Enhancement of Community Facilities) seeks to strengthen the existing creative community (which currently expands to New Cross and Peckham), developing a programme of local arts and culture events that will maximise connectivity and integration within and to the surrounding areas. This will have a positive effect on community identity, promoting equality and social inclusion. A schedule of facilities which are considered to be of community value has been prepared by the Neighbourhood Forum in consultation with the local community, which responds to the needs of different specialist groups.

Policy C1 (Protection and Enhancement of Community Facilities) and Policy NC1 (Protection and Enhancement of Crofton Park and Honor Oak Park Centres) seek to protect and enhance the quality and capacity of these valued facilities. Policy BE3 (Area of Special Local Character) also identifies and protects areas identified as Areas of Special Character (ASLC). In the Neighbourhood Plan area, ASLC are not just places with historic interest, but also refer to those places that the community and visitors value for their social, cultural, economic, environmental and landscape qualities. The protection and enhancement of community facilities and ASLC may have a positive impact for religious groups who have connections to these assets and/or facilities, for example places for worship and for carrying out religious activities.

Neighbourhood/local parades have been identified as a priority for investment in the Neighbourhood Plan area, and bringing vacant retail space back into active use to address issues of inequality. Policy E1 (Employment Sites and Enterprise) will provide protection to existing local employment sites, recognising the importance of local businesses in the area, particularly given the high proportion of the local population (13.5%) in self-employment.

The Neighbourhood Plan further seeks to ensure that shop units remain affordable to encourage local enterprise and independent businesses . This may include local ethnic owned businesses, having a positive effect on the economic prosperity of these groups.

A key focus of the Neighbourhood Plan policies is to promote a high quality environment to work and reside, supporting residents of all ages throughout the Neighbourhood Plan area and increasing neighbourhood satisfaction. Policy C1 (Protection and Enhancement of Community Facilities) places focus on the demographic trends in the area, notably that the population is fairly young and many are young families who recently moved into the area with a higher proportion of children aged 0-4. This is reflected through Policies E1-E2 and NC1-NC3, which set out how the area population of young people and families' needs will be supported, including through the regeneration of Neighbourhood Centres to provide employment opportunities in sustainable locations. Brockley Rise/Stondon Park shops have been highlighted as a particular issue, with improvements to the parade prioritised. Improvements to premises and new workspaces will also make better use of employment areas, utilising the space and providing job opportunities for young residents.

The HopCroft Neighbourhood Plan seeks to deliver sociable, vibrant, healthy and walkable neighbourhoods. This includes improvements to the sustainable transport network, which will positively affect the disabled,



	<p>women during pregnancy, the elderly, and also younger residents that do not have access to a car/are unable to drive.</p> <p>The provision of new and/or improved sustainable transport infrastructure (including cyclepath/footpath/road improvements) through Policies T1-T4 would further aid mobility for these groups, providing greater access to day-to-day services and facilities, and neighbouring centres.</p> <p>Policies GS1-GS4 seek to deliver improved access to green infrastructure and multi-functional open space in the Neighbourhood Plan area. This will also have a positive impact on the disabled, women during pregnancy, the elderly, younger residents, and families with young children, facilitating the uptake of exercise and community engagement. Promotion of a high quality environment to work and reside will increase neighbourhood satisfaction, contributing positively to the physical and mental health of all specialist groups.</p>
Health and Well-being	<p>It is noted through the Neighbourhood Plan that there is a lack of green links between open spaces; in particular there are poor links to the Green Chain Walk. Alongside, walking routes connecting the hilly parks of the neighbourhood lack trees or other green infrastructure. As such, Policy G1 seeks to deliver improvements to the natural environment on these corridors, with the aim of contributing towards reaching the area's full potential as a destination for walking to see the views across London.</p> <p>The Neighbourhood Plan places focus on addressing the pockets of deficiency identified by the Lewisham Open Space Strategy, particularly in the north-west and south-west parts of the Neighbourhood Plan area. Policy GS2 (Greening the Neighbourhood) seeks to address this, ensuring that the quantity of open space is sufficient to meet local needs. This includes through requiring new development to make appropriate provision for the planting and maintenance of new street trees (particularly along the main road connections of Brockley Corridor and Honor Oak Park and along the Three Peaks green chain walk). Tree planting along key routes will therefore create green links throughout the Neighbourhood Plan area, improving accessibility for residents, promoting integration of communities and supporting the uptake of healthier modes of travel.</p> <p>Improvements to the public realm in the Neighbourhood Plan area is further supported through Policy NC2 (Protection and Enhancement of Local Neighbourhood Parades), which requires development proposals to be of high quality design. Applicants are encouraged to take opportunities to enhance the appearance of the neighbourhood parades by "actively promoting and coordinating tree planting, pedestrian friendly and cycling initiatives (pedestrian crossings, cycle parking, signage, etc.)".</p> <p>Policies T2 (Pedestrians) and T3 (Cyclists) also seek to improve pedestrian and cycle access throughout the Neighbourhood Plan area, through providing safe pavements, safe and well-designed cycle routes and signage, and new and improved crossings. This will contribute positively to the public realm, improving the aesthetic value of the area and encouraging residents to use sustainable transport.</p> <p>Policy GS1 (Protecting Green Space) does not permit development that would result in the loss of a local green space or in any harm to its character, setting, accessibility, appearance or amenity value. Additional sites are designated as Local Green Spaces. These areas have a value to the community as local amenity space, and contribute towards addressing the deficiencies in open space provision seen in the north-east and south-east of the area.</p> <p>The Dalmain Wildlife Garden forms part of the outdoor area of Dalmain School, and contains a covered outdoor classroom. This is used to develop children's understanding of nature and science, while also providing health benefits through improved access to green space.</p> <p>Policy SA1 also responds to local residents' needs through seeking to ensure development does not have an unacceptable impact on existing residential amenity/open space provision or parking. This is reiterated through Policy H1 (Housing), which seeks to ensure there is appropriate provision for necessary social infrastructure in the Neighbourhood Plan area to meet demand. This includes education, health, and community facilities.</p>

<p>Transportation</p>	<p>In terms of accessibility via sustainable transport modes, the allocated site Land at Whitbread Road (Policy SA1) is located in a residential area close to amenities, local bus routes and Crofton Park Station. It is however noted that there are parking and safety concerns in regard to the site allocation, as access and visibility are poor coming in and out of the site. Policy SA1 (Land at Whitbread Road) seeks to address this through requiring that the proposed development demonstrates that there will not be an unacceptable impact on existing residential amenity/open space provision and parking.</p> <p>With regards to the Neighbourhood Employment Site allocation at Beecroft Mews, this site is located within 100m of Crofton Park Station, and is close to the local bus routes. Good access to public transport will allow for the utilisation of sustainable travel for those working at the employment site.</p> <p>Policy T4 (Public Transport) seeks to address the issues relating to the quality of both train and bus travel and associated facilities. Improvements to the public transport network would facilitate better access for residents, particularly those with reduced mobility. Policy T1 (Enhancements of Brockley Corridor), for example, seeks to address areas which are experiencing issues of congestion and are perceived as dangerous/unsafe (namely Brockley Road, Stondon Park, Brockley Rise and Stanstead Road). This has the potential to significantly improve day-to-day accessibility for specialist groups; older people and those with disabilities.</p> <p>It is however acknowledged within the Neighbourhood Plan that issues relating to public transport provision and services cannot be directly addressed by Neighbourhood Plan policies. As such, the Neighbourhood Plan Group will work with Lewisham Council and Thameslink to facilitate these improvements, particularly at Crofton Park Station.</p> <p>Policies T2 (Pedestrians) and T3 (Cyclists) further seek to support sustainable transport use in the Neighbourhood Plan area, requiring development to increase the amount of space for pedestrians around public transport facilities, and improve the existing network of the footpath and cycle networks in the area. This will better connect the Neighbourhood Plan area with surrounding communities and contribute positively towards reducing the reliance on the car for shorter journeys. The promotion of safer sustainable transport networks throughout the Neighbourhood Plan area will encourage the uptake of healthier modes of travel, primarily walking through improvements to the pedestrian experience.</p> <p>Policies GS2 (Greening the Neighbourhood) and G1 further seek to improve the walking and cycling environment to improve access to local services and public transport provision. This includes, but is not limited to, improvements at Eddystone Road Footbridge, a key gateway to the neighbourhood by bike and on foot.</p> <p>The Enhancement of Brockley Corridor (Policy T1) and the Brockley Corridor Improvement project (led by Lewisham Council) seek to address the parking and congestion issues of the Neighbourhood Plan area, particularly around Stillness Junior and Infants School and Beecroft School. Policy T1 sets out a coordinated scheme that will reduce the dominance of motor vehicles along the Brockley Corridor through the delivery of cyclist and parking bays in appropriate locations, and provision for car clubs and electric charging points. This provides a significant opportunity to address issues relating to road traffic, improve infrastructure for pedestrians and cyclists and enhance the quality of the environment.</p>
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## 5.2 Habitat Regulation Assessment (HRA)

The draft Neighbourhood Plan was screened by Lewisham Council (January 2017) to determine whether a full Habitat Regulations Assessment is required in accordance with Article 6(3) and (4) of the European Communities (1992) Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as the 'Habitats Directive'). The Habitats Directive established a Europe-wide network of sites known as Natura 2000, which provides for the protection of sites that are of exceptional importance for rare, endangered or vulnerable natural habitats and species within the European Union. The Habitats Directive was implemented in the UK through the Conservation (Natural Habitats, &c.) Regulations 1994 with all further amendments subsequently consolidated within the Conservation of Habitats and Species Regulations (2010).

The Screening Report was carried out in accordance with the requirements of the Habitats Directive and Regulations in order to ensure that the protection and integrity of the following European Sites is included as part of the Local Plan preparation process:

- Lee Valley SAC and Ramsar
- Richmond Park SAC
- Wimbledon Common SAC
- Epping Forest SAC

Since there are no European Sites within the borough and those identified for the screening are within 15km of the borough boundary, the draft determination of the assessment was that none of the policies contained in the draft NDP has been found to have a likely significant effect on any designated European. In particular, the draft NDP either on its own or in combination with any other relevant plans and projects, are unlikely to result in significant effect on the primary reasons for the designation of the European Sites and there is therefore no need to undertake tasks two and three of the Habitats Regulation Assessment.



## 6 Meeting the Prescribed Conditions and Legal Requirements

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### 6.1 Prescribed conditions

This statement has demonstrated that the draft HopCroft Neighbourhood Plan satisfies the five basic conditions that are relevant to a neighbourhood plan. These are:

- having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- the 'making' of the neighbourhood plan contributes to the achievement of sustainable development
- the 'making' of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- the 'making' of the neighbourhood plan does not breach, and is otherwise compatible with EU obligations
- prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. The prescribed condition is that the 'making' of the neighbourhood plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2012) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007) (either alone or in combination with other plans or projects).

### 6.2 Legal requirements

The HopCroft Neighbourhood Plan satisfies each of the prescribed legal requirements as follows:

- *The plan is being submitted by a qualifying body.* The HopCroft Neighbourhood Plan is being submitted by the Crofton Park and Honor Oak Park Neighbourhood Forum (The HopCroft Forum) which was designated by the Mayor of Lewisham in July 2014.
- *The draft neighbourhood plan sets out policies in relation to the development and use of land in the whole or any part of a neighbourhood area.* The HopCroft Neighbourhood Plan relates to the designated neighbourhood area of Crofton Park and Honor Oak Park and includes land use planning policies that can be used in the determination of planning applications.
- *The proposed neighbourhood plan states the period in which it is to have effect.* The HopCroft Neighbourhood Plan covers the ten year period 2017-2027 and this is stated in the Neighbourhood Plan.
- *The policies do not relate to excluded development.* The HopCroft Plan does not relate to excluded development
- *The proposed neighbourhood plan does not relate to more than one neighbourhood area.* The HopCroft Neighbourhood Plan does not relate to more than one neighbourhood area and there is no other neighbourhood plan in force for the HopCroft neighbourhood area.

### 6.3 Conclusions

This Neighbourhood Plan has been produced by the HopCroft Neighbourhood Forum through consultations over a period of three years with the local community. The policies and actions set out in the plan aim to address the key themes and priorities identified by the community and to contribute to sustainable development in the neighbourhood area. The Plan also takes a forward looking approach by identifying new development opportunities.

The Policies have been drafted taking into account national and local planning policies and are considered to be in conformity with these policies. The Strategic Environmental Assessment indicates that the Plan would have a significant positive effect on the area.

Taking all these together, we consider that the Plan is in conformity with the relevant regulations and prescribed conditions and can be approved accordingly.

## Neighbourhood Forum Contact

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