

Grove Park Neighbourhood Plan Reg 16 comments.

1. Introduction

1.1. We would first like to thank the forum for engaging with council officers at this stage of the plan and giving us the opportunity to provide our feedback. We do fully appreciate the level of work that the forum has undertaken regarding the neighbourhood plan to date.

1.2. The basic conditions that have to be met during the production of a Neighbourhood plan are as follows:

- Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order (neighbourhood plan).
- Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it processes, it is appropriate to make the order.
- Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order.
- The making of the order (neighbourhood plan) contributes to the achievement of sustainable development.
- The making of the order (neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority.
- The making of the order (neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
- Prescribed conditions are met in relation to the Order (neighbourhood plan) and prescribed matters have been complied with in connection with the proposal of the order (neighbourhood plan).

1.3. Only where a draft Neighbourhood Plan meets all of the basic conditions can it be put to a local referendum and 'made' (i.e. adopted). Normally, Forums will prepare a basic conditions statement to demonstrate to an independent plan examiner that the plan meets the basic conditions.

1.4. A neighbourhood plan, once adopted, forms part of the council's statutory Development Plan alongside the London Plan and the Lewisham's Local Plan. It is also used with the National Planning Policy Framework (NPPF) in the determination of planning decisions in the borough. The hierarchy of planning policies in Lewisham is as follows:

- National Planning Policy Framework (2019);
- London Plan (2016), or any subsequent document;

- Lewisham Local Plan, current comprising the Core Strategy (2011), Development Management (2014), Lewisham Town Centre (2014) and Site Allocations (2013) local development documents; and
- Neighbourhood development plans.

1.5. The role of the neighbourhood plan is to support delivery of sustainable development locally. It must conform with policies set out in the higher-level documents and support the delivery of strategic policies that are contained within Lewisham's Local Plan, helping give effect to the Borough's spatial development strategy

1.6. Neighbourhood Plans can be useful documents to local authorities as they provide several benefits such as identifying locally specific issues and policies that Local Plans may not have identified at the strategic level, identifying small sites that could deliver important development (such as housing or new workspace), and helping to set priorities for the use of neighbourhood Community Infrastructure Levy (CIL) funding.

1.7. It is worth noting that if the neighbourhood plan will be required to be in general conformity with the current adopted versions of the London Plan and Lewisham Local Plan at the time it undergoes examination. However the council strongly advises the Forum to give consideration to the latest emerging higher-level documents. This will help to ensure the neighbourhood plan policies remain up-to-date and, for the Forum, may help to avoid the need for an early stage review of the neighbourhood plan, should it come into force. The draft new London Plan has recently undergone an independent examination and is available online.

1.9. These comments will be forwarded to the examiner of the plan at the examination stage with the intention to assist the examiner determine if any modifications to policy should be considered. Any modifications required in the plan that have been suggested by the examiner will be carried out by council officers.

2. Officer overview of plan

2.1. We would first like to acknowledge the hard work that the Grove Park Forum undertook in the drafting of this plan. It is clear to council officers that a lot of thought and time has gone into this document and clearly reflects a number of issues that the forum feels passionately about within the locality of the plan area.

2.2. The plan provides a solid context of how the policies were developed with a very informative neighbourhood profile that effectively places the Grove Park neighbourhood within the context of Lewisham and London as a whole.

2.3. There is a clear vision statement for Grove Park which helps the reader of the plan understand the policy context and what the forum would like to achieve through the successful adoption of the neighbourhood plan.

2.4. Officers would also like to acknowledge the focus on green infrastructure and the protection of green spaces as a key objective of the plan. The Council is supportive of policy that helps to safeguard and improve the greening of the borough.

2.5. There is an appropriate policy context listed throughout the Grove Park Plan. This clearly demonstrates how policies present in this plan conform to national and local planning policies.

2.6. Although the vision of the plan is clear we would draw attention to some of the wording within the plan. Officers would recommend that wording be modified regarding the size of development policies relate to. It is noted within the schedule of comments on a number of occasions that it would be unreasonable for small developments, particularly where single dwellinghouse developments would be concerned, to submit some of the supporting documents required in the policies to have their application supported by the plan.

2.7. Officers would also recommend replacing some of the terminology within the plan, with particular focus on Biophilic and Human centric. This document is intended to be used by a range of stakeholders from council officers to homeowner applicants and the plan should steer clear of any wording or phrasing that may cause some confusion to the applicant.

2.8. 10 site allocations have been identified within the draft plan.

- Vacant Land, Lions Close
- Cleared Land on Grove Park Road
- Bus waiting area and vacant land at rear
- Lewisham adult education centre
- The Ringway centre
- The Grove Park library
- Grove Park Youth Club, Marvels Lane
- Land to rear of Baring Hall Hotel
- Former Boxing Club
- W.G Grace Site and Curtilage

3. Formatting of the Plan

3.1. Officers consider the plan to be appropriately formatted with policies clearly presented with chapters clearly identified and consistent policy numbering. The policy context and justification are also effectively presented.

3.2. The mapping present in the plan is also appropriate and acts as a useful illustration regarding the plans objectives.

4. Officer conclusion

4.1. Council officers are happy to recommend the Grove Park Neighbourhood Plan be progressed to the examination stage. The council will, with support of the forum agree an examiner to examine the plan.

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Policy Name	Officer comment
<p>Policy HR1: Conservation and Enhancement of Heritage Assets and Buildings of Townscape Merit</p>	<p>Current Lewisham Policy (DM 37) supports this policy by protecting the local distinctiveness of the borough by sustaining and enhancing the significance of non-designated heritage assets.</p> <p>The submission of a heritage statement with development proposals is supported through DM 37 as a requirement to justify any changes to the asset.</p> <p>The protection of designated heritage assets is supported through National and Regional planning policy.</p> <p>The council supports this policy</p>
<p>Policy HR2: conservation of areas of Special Local character (ASLC)</p>	<p>DM 37 part C of the Lewisham LDF supports the principle that “development in ASLC should sustain and enhance the characteristics that contribute to the special local spatial, architectural, townscape, landscape or archaeological distinctiveness of these areas”</p> <p>Wording in part 2 iii of the policy suggesting that development will not be permitted should be changed to resisted. Planning policy is unable to fully protect a non-designated heritage asset in an ASLC as this is a local designation. Development proposals do have to show however that any environment change has to have a positive impact on an ASLC.</p> <p>Proposals on alterations on heritage and non-heritage assets are considered in the Lewisham Alterations and Extensions SPD 2019</p> <p>It is worth noting that this document needs to be interpreted by a range of stakeholders and the council recommends that the word Biophilic is replaced.</p> <p>This policy is supported by the council</p>
<p>Policy HR3: Enhancement of Chinbrook Estate ASLC</p>	<p>The policy is supported by the council.</p> <p>This policy could be worded to be more specific to the character of the chinbrook estate. The policy also includes reinstating heritage features which could be considered more appropriate as a project rather than a policy.</p>
<p>Policy NC1: Enhancement of Grove Park Neighbourhood Centre and Shopping Parades</p>	<p>The council is supportive of this policy and is supported through Lewisham policy DM 16 however</p> <p>Change of use through permitted development from retail to resi up to 150m2 is achievable without the need of planning permission. Change of use through permitted development as they stand cannot be challenged by a neighbourhood plan. It is worth noting that Permitted development rights have been reviewed since the Lewisham LDF was published.</p>

Policy Name	Officer comment
	<p>Part 2 – This is supported by the Lewisham Shop front Design Guide SPD as referenced.</p> <p>The ability to promote local street art on shop shutters in an area that is not a conservation is at the discretion of the shop owner and can be achieved outside of a neighbourhood plan.</p>
Policy NC2: Grove Park Neighbourhood Centre Regeneration Area	Grove Park neighbourhood centre has been identified as a strategic regeneration area in the draft Lewisham local plan. The council will work closely with the Neighbourhood forum and the wider community supported by public and private sector investment to successfully deliver a regeneration program.
Policy BE1: Extensions and Alterations to Existing Buildings	This policy is supported by the council through the Alterations and Extensions SPD 2019.
Policy BE2: Human Centric and Biophilic – led Design of New development	<p>The wording of this policy will be difficult for some users of this document to interpret. We would recommend that the phrasing human centric and Biophilic be replaced.</p> <p>It is also important to define the size of the development in this policy. It would be unreasonable for a single dwelling house which is still considered a development to undertake a HIA or demonstrate how it has involved co-design ideas from community participation.</p>
Policy CA1: Safeguarding and Enhancement of Key Cultural Community Assets	We would recommend that the wording be changed from “not permitted” to “not supported”.
Policy CA2: Safeguarding Public Houses	<p>The council supports the safeguarding of public houses through DM policy 20.</p> <p>We recommend that the word “refused” be modified to “not supported”. The neighbourhood plan does not have the power to refuse an application. A planning decision will be made amongst a number of considerations within a proposal.</p> <p>It is also worth defining who would be responsible for providing the “authoritative marketing evidence”</p>
CIL 1: Allocation of CIL funding	<p>This policy aligns with the national CIL regulations already adopted by the council in 2015</p> <p>The Council adopted a Neighbourhood CIL strategy in Aug 2019 based on the identifying key spending priorities through a public consultation. The NCIL priorities identified in the Grove Park Neighbourhood Plan will be considered as part of this consultation exercise.</p>

Policy Name	Officer comment
<p>Policy H1: Delivering a Healthy mix of Housing and Quality Design</p>	<p>Lewisham implemented a HMO article 4 direction in 2019 that covers the Grove Park neighbourhood area which restricts the conversion of existing housing into HMOs.</p> <p>The wording of the policy should consider the size of the development as it would be unreasonable for all development to provide draft an impact assessment on provision within the area. We recommend that the wording include all major development which stipulates development of 10 units or more.</p> <p>The same applies for the co-design approach in part 6 of the policy.</p>
<p>Policy H2: Promoting Affordable Local Ownership</p>	<p>The council supports this policy</p>
<p>Policy H3: Windfall Sites</p>	<p>The council is mostly supportive of this policy. It is recommended that the wording be modified to include size of development.</p> <p>Policy point iv will fall under the councils existing adopted s106/CIL policies.</p>
<p>Policy EM1: Protect Micro-Enterprise Employment Sites</p>	<p>The protection of employment sites is largely supported by the council, however;</p> <p>It is recommended that the change of use to live-work sites in part 3 is removed. The council does not support the provision of live-work as it has proved too difficult across Lewisham and London as a whole to ensure that the use remains true live-work in perpetuity.</p> <p>The wording of part 4 is recommended to be modified to remove the assumption that opportunities will be secured for local employment. It is also not within the remit of a neighbourhood plan to determine the locality of employment. A neighbourhood plan is concerned with land use and not the protection of jobs or the safeguarding of local employment opportunities.</p> <p>S106 agreements however can be used to ensure local employment opportunities through apprenticeship schemes</p>
<p>Policy EM2: conversion of Unused Garages to promote Micro-enterprise</p>	<p>The council is supportive of this policy.</p> <p>Additionally the policy could include the conversion of unused garages under a meanwhile use if the council identifies the site as a future estate renewal programme.</p>

Policy Name	Officer comment
Policy T1: Enhancement of Key Active Travel Routes	<p>It is recommended that the wording be modified to include the size of the development.</p> <p>The council is supportive of this policy.</p>
Policy T2: Promote the use of sustainable Vehicular Options	<p>It is recommended that the wording be modified to include the size of the development.</p> <p>Lewisham is supportive of policy that promotes the use of sustainable vehicles and the provision of electric charging points.</p> <p>The wording of this policy can be modified to include high density schemes when promoting the establishment of car clubs .This can be achieved through s106 agreement.</p>
Policy GI1: Protection and Enhancement of Grove Park’s Green Spaces	<p>Lewisham is committed to the protection and enhancement of green spaces within the borough and is supportive of this policy. It is supported through London Plan policy stating there is no net loss of green space across London.</p> <p>Part 2 of this policy we recommend that the wording be changed to “will not be supported” rather than “not permitted”</p> <p>Trees can be protected through a TPO or to a lesser extent if they are situated within a conservation area. A neighbourhood plan is unable to fully protect trees that are not protected by either of the aforementioned designations. The council does support the replacement of trees if development unreasonably removes trees particularly if they are designated under a TPO or within a conservation area. It is also difficult to measure a loss in tree canopy cover so we would recommend a re-wording of this policy.</p> <p>The council supports the preservation of tranquil spaces ad quiet areas. We recommend that the wording be changed from “not permitted” to “not supported”. The SINC sites mentioned in this policy already have a robust designation and therefore a further designation may not be required.</p>
GI2: Delivering the Linear Natural Parkland Nature Trail (Railway Children Urban National Park)	<p>The council is supportive of this policy and is currently working with the community in Grove Park regarding this project.</p>
Policy GI3: Designation of Nature Conservation Improvement Areas	<p>The council is supportive of this policy</p>

Policy Name	Officer comment
Policy GI4: Green Infrastructure –led development	<p>Although the council supports the principle of Green Infrastructure led development, officers would consider this policy wording to be over complicated and difficult to interpret. It is recommended that the policy text be simplified and made easier to interpret.</p> <p>SUDs should be considered on a development by development basis as it would be unreasonable for all new development to contribute substantially to s SUDs system.</p>
Policy GI5: Protection of the designated Dark Sky Status of Grove Park Nature reserve	<p>Dark Sky Status is not a recognised designation but appears to be a nomination to the Dark Sky Discovery group which is used as a networking group for Stargazers.</p> <p>Protection can be offered as supported by DM 27 regarding light pollution that will have a detrimental impact on views of the night sky.</p>
Policy SE1: Incorporation of Climate adaptation Measures	<p>The council is supportive of this policy, however we would recommend the text be modified to define the size of development.</p> <p>In part i of the policy, it is unclear who would be responsible for carrying out the requested feasibility on net temperature increase. Again this would be unreasonable for a small development to carry out as part of the application process</p>
Policy SE2: Improving Air Quality	<p>The council is supportive of this policy. With major development an Air quality impact assessment is required as part of the application submission (DM 23).</p> <p>The emerging Lewisham Local Plan also strengthens the boroughs approach to improving air quality which will support this policy.</p> <p>It is recommended that the wording be modified to define the size of development throughout this policy. It would be unreasonable to expect small developments such as a single dwelling house to demonstrate some of the requirements within this policy.</p>
Policy SE3: Alleviating Flood Risk	<p>The council is supportive of this policy.</p> <p>We would recommend that the wording be modified to include a flood risk assessment be submitted with a major development proposal.</p> <p>The policy should consider the benefits of the SUDs system on a development by development basis.</p>