

Ref No.	Consultee/Stakeholder	Response
1.	Natural England	Natural England does not have any specific comments on this Neighbourhood Plan
2.	National Grid	<p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p>
3.	Thames Water	<p>We consider that Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text:</p> <p><i>PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT</i></p> <p><i>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</i></p> <p><i>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning</i></p>

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Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."

Policy SE3: Alleviating Flood Risk & Policy

G14: Green Infrastructure-led Development - Comments in relation to Flood Risk and SUDS

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that

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limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the SPD: ***“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”***

Policy SE3: Alleviating Flood Risk – Comments in relation to water efficiency

We support the reference to water efficiency, but consider this would be better located in a water/sustainability policy, rather than a flood risk policy.

The Environment Agency has designated the Thames Water region to be *“seriously water stressed”* which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.

<p>3. Cont.</p>		<p>Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link: https://www.thameswater.co.uk/Be-water-smart</p> <p>It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p> <p>Proposed policy text:</p> <p><i>“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”</i></p>
<p>4.</p>	<p>Historic England</p>	<p>Historic England reviewed the plan at draft stage and in response to SEA Screening Request in August 2018, provided the following comments</p> <p><i>Having considered the information submitted we acknowledge the clear intention of the Plan is to promote outcomes which are positive for local character and the historic environment and avoid (harmful) significant environmental impacts. However by virtue of allocating sites additional to those in the Council’s Site Allocations Local Plan for mixed use development we cannot, at this stage, rule out the possibility of the plan encouraging development which will generate significant impacts.</i></p>

<p>4. Cont</p>		<p>However in respect of the submitted Draft Plan we would consider that the policies are unlikely to have significant negative environmental impacts. In respect of Site Allocation Policy for Site SA8 Baring Hall Hotel (a grade II designated heritage asset) we would consider this likely to result in positive outcomes. We would note that the policy could be strengthened slightly by revising SA8 ii to state “Respect and seek to enhance the character and setting of the Grade II listed Baring Hall Hotel etc.”.</p> <p>Overall the proposed Plan is ambitious and proposes a strong vision for the both environmental and heritage led considerations. The policies are clear and well set out. We do have a number of minor points in respect of heritage policies which will ensure that these are conformity to national policy as set out in Chpt 15 of the NPPF. These are as follows:</p> <p>Policy HR1</p> <ul style="list-style-type: none"> • Proposals that result in significant harm to a heritage asset or its setting will be refused, unless it can be demonstrated that the tests set out in Policy 195 and 196 (NPPF, Rev Feb 19) have been met; <p>Policy HR1 2 iv. To avoid ambiguity it may be appropriate to state:</p> <ul style="list-style-type: none"> • <i>Every opportunity has been taken to protect and preserve the principal building frontage of a heritage asset...<u>add</u> where this makes a positive contribution to its character and significance and/or the townscape.</i>
<p>5.</p>	<p>L&Q</p>	<p>Two parcels of land in London & Quadrant Housing Trust’s ownership are included in the Submission</p> <p>Version of the Grove Park Neighbourhood Development Plan (2018-2033). The sites subject to specific allocations are:</p>

5. Cont		<p>a. SA1: Vacant land, Lions Close - Allocation for Housing b. SA10: W.G. Grace Site and Curtilage. – Allocation Housing & Community Facilities</p> <p>Policy SA1: Vacant land, Lions Close In the Submission Version of the Grove Park Neighbourhood Development Plan, the proposed wording for Policy SA1: Vacant land, Lions Close is as follows:</p> <p>Vacant land in Lions Close is allocated for housing and should be developed in line with the Housing Policies (H1-H2). Development proposals will be required to:</p> <ul style="list-style-type: none">i. Prepare a masterplan to indicate best use of land and how it connects to the surrounding area.ii. Demonstrate collaborative working with the community to define a design code to ensure quality of design is in line with Policies BE2.iii. Meet the policy aims stated in Part 3 of this document.iv. Make appropriate contributions towards necessary social infrastructure including education, health and community facilities.v. Proposals for affordable housing and community-led/ self-build housing and the establishment of a Community Land Trust will be supported.vi. Layouts should address boundary treatment in relation to adjacent existing Chinbrook Estate edge as well as the Open Green Space in Mottingham, maintain footpath access to the Sports Grounds and follow the street pattern of adjacent sites, so it is well connected and integrated with the adjoining residential area.
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5. Cont		<p>This allocation for residential is supported, but it is requested that the following is taken into consideration:</p> <p>In relation to Section (i), the site has been the subject of a feasibility study and development typologies in the preparation of this Neighbourhood Plan. In addition, L&Q has carried out some pre planning feasibility work in developing a residential scheme (comprising nine dwellings) for the site, including pre-application meetings with the local authority during 2018/19 and a public consultation exhibition in September 2019.</p> <p>Given the small scale of the site and the feasibility work already undertaken on the redevelopment of the site, it is considered that a masterplan would be unnecessary, and the wording at (i) should be deleted.</p> <p>In Section (iv), delete the wording ‘Make appropriate contributions towards necessary social infrastructure including education, health and community facilities’. With the adoption of the Community Infrastructure Levy and/ or Lewisham Council’s Planning Obligations SPD, it is not necessary for the policy to require appropriate contributions towards necessary social infrastructure and this part of the policy should be deleted.</p> <p>In Section (vi), omit the wording ‘maintain footpath access to the Sports Grounds’. There is currently no formal right of way through the site (and the adjoining communal garden of Kingsfield House). The existing informal footpath that traverses the site is not well used and has caused safety issues in the past and therefore the policy should not require its retention.</p> <p>Policy SA10: W.G. Grace Site and Curtilage In the Submission Version of the Grove Park Neighbourhood Development Plan, the proposed wording for Policy SA10: W.G. Grace Site and Curtilage is as follows:</p>
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6.	Network Rail	<p>Thank you for consulting Network Rail on the Proposed Grove Park Neighbourhood Plan. I have consulted internally and wish to make the following comments:</p> <ul style="list-style-type: none"> 1. It will need to be ensured that the Operational Railway Assets are protected from any development alongside of it. Any future maintenance must be capable of being conducted solely on the applicant's land without adversely affecting the safety of, or encroaching upon Network Rail's adjacent land and air-space. The setbacks for building is 2m. This is particularly relevant to the boundary of the railway children urban national park.

6. Cont		2. The Grove Park Station remains inaccessible without lifts. Should development come forward as a result of this Neighbourhood Plan, opportunities should be explored for contributions which could help to fund accessibility improvements.
7.	Cllr Suzanne Clarke	<p>As Local Councillor I am writing to strongly support the Grove Park Neighbourhood Plan. The proposals to protect our built and natural heritage assets are very important in the development of Grove Park as a sustainable community and I am pleased that the Plan is comprehensive in its outlook ranging from protection of biodiversity, and Urban National Park Vision, further greening or our environment, and the potential to generate further investment and employment.</p> <p>This plan is deeply rooted in the community and widely supported.</p>
8.	General consultee	I am a resident in SE12 and write to confirm that I have reviewed the Neighbourhood Plan and it looks very good; the objectives of it would greatly improve the life of local residents. I support the plan.
9.	General consultee	<p>We are writing in support of the Grove Park Neighbourhood Plan.</p> <p>The proposals to protect our built and natural heritage assets are going to be important in the development of Grove Park as a sustainable community and we are pleased that the Plan is comprehensive in its outlook ranging from protection of biodiversity, and Urban National Park Vision, further greening or our environment, and the potential to generate further investment and employment.</p> <p>We would welcome a solid reassurance about freedom from development from the following sites:- Willow Stables Grove Park Nature reserve Gardens in the Properties along Baring Road</p>

		<p>The Ringway centre and Grounds including woodland The Railway boundary ground Lee and District Allotments St Augustine's Church and Surrounding Grounds</p>
10. 10. Cont	General consultee	<p>I'm writing to confirm my support for the GPN Plan. I attended a number of meetings as the plan was put together and now that you are ending your consultation, I want to make clear that this is the most comprehensive proposal I have seen for a better Grove Park, with a focus on having a true town centre and the ambition for an urban park, is second to none, a vision that Grove Park desperately needs.</p>
11.	General consultee	<p>I am writing in support of the Grove Park Neighbourhood Plan.</p> <p>The proposals to protect our built and natural heritage assets are going to be important in the development of Grove Park as a sustainable community.</p> <p>I am also very much in favour of the built environment it aims to protect, especially Grove Park Youth Club and The Baring Hall Hotel public house to name just two.</p>
12.	General consultee	<p>I hereby register my support for the Grove Park neighbourhood plan, I agree with all the proposals and policies it sets out for Grove Park.</p> <p>I appreciate all that has been done to create it and hope it will be recognised and 'made' by Lewisham Council soon.</p>
13.	General consultee	<p>I live at [REDACTED] and fully agree with the policies in the Neighbourhood Plan, especially those relating to the protection of the neighbourhood's community assets.</p>

<p>13. Cont.</p>		<p>In particular protecting our natural assets and biodiversity is incredibly important and due to its proximity to my house, I am especially concerned about the Willow Tree Nature Reserve. I fully endorse Lewisham's Core Strategy Objectives relating to Environmental Assets especially Core Strategy Objective 7: "the important environmental, ecological and biodiversity features of Lewisham will be protected and capitalised to promote health and well-being by: a. protecting all open space including Metropolitan Open Land; b. protecting Sites of Importance for Nature Conservation and supporting and promoting local biodiversity; c. requiring green roofs and walls where appropriate; d. implementing the Street Tree Programme; e. improving the quality of, and safeguarding access to, all public open space, providing accessible and varied opportunities for health, leisure and recreational activities including the South East London Green Chain Walk, the Green Grid, the Waterlink Way and river and waterways network, and the Thames Path".</p> <p>I strongly support the green infrastructure plans including the Urban National Park, and other measures which support and enhance the natural environment which is an asset for us all.</p>
<p>14.</p>	<p>General consultee</p>	<p>Here is our response to the neighbourhood forum consultation.</p> <p>We agree with the policies in the Neighbourhood Plan, especially those relating to the protection of our community assets, both historic and natural. We would love an Urban National Park. Protecting our biodiversity is of the utmost importance.</p> <p>We therefore strongly support the green infrastructure plans including the Urban National Park vision, and we see the drive to protect and enhance the community and built and natural heritage assets as key to a healthier future for us all.</p> <p>We would also dearly love to see the re-instatement of natural verges along roads in our ward, with trees and flowers, which bring biodiversity and help to alleviate climate change.</p>

15.	General consultee	<p>I write to register my support for the policies and principles laid out in the Grove Park Neighbourhood Plan. The plans are not overly ambitious and will support and encourage the longer term decarbonisation of our economy and appreciation of our green assets among the community.</p> <p>I must declare a personal interest in one particular aspect which borders my property: <i>The Willow Tree Nature Reserve SINC</i>.</p> <p>I understand planning is ongoing with the owners of the land at the former Stables, and I am keen to see how their plans will fit in with this neighbourhood plan (and not the other way round).</p> <p>I strongly support any attempts to make this wild and wonderful area safer and more accessible to the community and those passing through.</p>
16.	General consultee	<p>It did take quite a long time to wade through all the proposals for the new prospective changes to revamp Grove Park. It has been in such a dilapidated state for far too many years and I was very impressed by the variety and scope of the new suggestions. A very well thought out and detailed plan, encompassing all that needs to be changed in Grove Park to make it the beautiful area it once was. I fully agree with the plans.</p>
17.	General consultee	<p>I write in support of the above plan, in particular the new proposed side-route for cyclists</p>