

## Lee Neighbourhood Plan – Lewisham Council Regulation 16 response

### 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 (2021);
- London Plan (2021), 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 the Plan**

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

2.2. The plan provides a comprehensive area appraisal which gives a good context to the aims and objectives of the plan and how the policies were drafted. The policy themes are also clearly identifiable through colour coding and chapter formatting. It is recommended that the Lee Forum Area Profile (Annex 2) be moved to the start of the beginning of the plan as this would provide a better context to the area appraisals.

2.3. It is recommended that the evidence studies that help determine the draft policies be presented as standalone documents instead of being hyperlinked within the body of the text. Although this could be considered as assisting the reader of the plan, it could cause some issues around the accessibility of the evidence base documents.

2.4. There are some maps in the plan such as Figure 7, 8, 14 and 16 that are difficult to inspect as some icons on the map overlap. The maps within the plan should be presented at a higher resolution to offset any accessibility issues that the reader may experience.

2.5. Although it is at the discretion of the forum, officers feel there is an unnecessary number of photographs within the plan. Many of the images used could be considered as being quite similar and therefore not needed. Presenting the images so they more closely relate to the text would improve the presentation of the Plan. Multiple pages of images as currently presented can sometimes feel abstract. .

2.6. We would advise that the plan adopts consistent planning terminology used in higher level policy documents. Where improper planning policy terminology has been used is identified in the table of officer comments (Table A).

2.7. There are 12 site allocations in the Lee Neighbourhood Plan with all 12 sitting within the boundary of the London Borough of Lewisham.

- Dacre Park, Car Park entrance to allotments
- Old road, SE13 5SR
- Old Road Deport, SE13 5SU
- Corner of Burnt Ash Hill and Holme Lacey Rd
- Wisteria Rd
- Effingham Road
- Sainsbury's, 14 Burnt Ash Road SE12 8PZ
- 321 – 341 Lee High Rd
- Off Burnt Ash Rd
- Leegate Shopping Centre
- Corner of Osberton Road and Millbank Way
- 168 Lee High Rd

2.8. Officers have some concerns regarding the site allocation policies within the neighbourhood plan which are discussed at greater length in the table below.

2.9. Three of the site allocations have been identified through the emerging Lewisham Local Plan and we would ask for policies concerning these sites to be:

A. Removed to avoid confusion or conflict with the emerging Draft Lewisham Local Plan site allocations, or;

B. Ensure that the site allocations are consistent with the draft Local Plan site allocations where additional local detail could be included in an evidenced manner.

These sites are:

- Sainsbury's, 14 Burnt Ash Road SE12 8PZ
- 321 – 341 Lee High Rd
- Leegate Shopping Centre

2.10. Officers would like to note that the Leegate site allocation was submitted as part of the submission version of the plan at Regulation 15 and the council nor landowner were afforded the opportunity to submit a representation regarding this site allocation during the Regulation 14 consultation. A planning application was submitted to the Council for the site on 27/05/2022 Ref number DC/22/126997

2.11. Officers would like to note that the site allocation adjacent of Dacre Park, Car Park entrance to allotments has been requested by the forum to be removed from the plan due to overwhelming objection for the wider community during the initial weeks of the Regulation 16 consultation.

2.12. Currently there are no indicative capacities included within the site allocations. Officers would find the inclusion of an indicative number to be useful, particularly considering the size of area of some of the site allocations submitted in the plan.

2.13. Further detailed comments regarding individual policy can be found in the table(s) below.



**Table A – Lee Neighbourhood Plan Policy comments**

Policy reference	Comment
GB1 Protection and Enhancement of Green space	<p>A: The open spaces identified in Figure 5 are designated within the Lewisham Local Plan and are afforded protection against development as per policy Core Strategy Policy 12. this policy is replicating pre-existing policy. Is the intention here to uplift some of these designations to LGS to provide more protection?</p> <p>B: The Council supports this policy</p> <p>C: Through policy DM25 in the adopted Lewisham DMLPA and policy SD2 in the emerging draft Lewisham Local Plan it is already a requirement of major development to submit a landscape scheme or a sustainable design statement as part of the planning application. It is recommended that the specific threshold requirements be removed and replaced with “major development”</p> <p>D: The Council supports this policy</p>
GB2 Achieving a Green Infrastructure – led development approach	<p>The threshold requirements should be removed and replaced with “major development”</p> <p>The Council considers the wording “demonstrate how it meets the following criteria” to be unreasonable and should be modified to reflect this.</p>
GB3 Designation of Nature Improvement Areas: River Quaggy Trail and Hither Green Nature Trail	<p>It is unclear if the intention of this policy is to designate a Nature Improvement Area through this policy, or through a subsequent consultation with the community.</p> <p>It is recommended that this policy be reframed as a project catered around delivering the River Quaggy Trail and Hither Green Nature Trail.</p> <p>It is of the officers belief that a significant and robust evidence base would be needed to designate these areas as Nature Improvement Areas which is a national designation covering areas of 10,000-50,000 ha. . A Local NIA can be designated by the Local Authority in partnership with the forum, however should be achieved independently from the neighbourhood plan.</p>

<p>GB4 Protection and Increase of Tree Cover</p>	<p>A: Neighbourhood plans cannot request or determine changes in the Council’s validation criteria regarding planning applications. All of the points within this policy are considered through the development management process and covered by existing London Plan, Local Plan Policies and reflected in the emerging draft Local Plan.</p> <p>B: The Council supports the intention of the plan to protect canopy and tree cover within the neighbourhood area, however protections cannot be provided to trees purely on their age or maturity. There are significant protections for trees covered by TPOs and conservation areas.</p> <p>B: Any tree covered by a TPO or situated within a conservation area is subject to a tree application as assessed by the Council’s tree officer and is required to be replaced by an appropriate species as determined through the permission if granted. The tree protection does not cover “mature” trees that are not subject to protection through a TPO or conservation area.</p> <p>Part 4B of the policy should be removed and included in the recommended further actions section</p>
<p>GB5 Managing Flood Risk</p>	<p>A: Applicants for major development are required to submit a Flood Risk Assessment summarising how a reduction on flood risk will be delivered. This is replicating existing policy.</p> <p>B: The Council supports this policy in line with emerging Local Plan policy SD8. It would be worth reinforcing in the policy that the any SuDs should achieve green field run off rates to ensure that water runoff is managed as close to the source as possible.</p> <p>C: The council supports this policy</p> <p>D: This policy should be re-worded to “Where planning permission is required the paving over of front gardens will not be supported”</p>
<p>GB6 Protection and Enhancement of Lee’s Playing Fields</p>	<p>This policy is replicating Sport England’s national policy regarding no net loss of playing fields.</p>
<p>TC1 Protect, Promote and Enhance Public Transport</p>	<p>A: The Council in principle supports this policy however a neighbourhood plan does not have the ability to propose the creation of new bus routes or the enhancement of existing bus routes. This will be determined by TFL in partnership with Lewisham Council. The policy is however supported by the emerging Lewisham Local Plan TR1B which states that “</p>

	<p>Development proposals must aim to improve and not adversely impact on the effective function and safe use of Lewisham’s transport network and public realm”</p> <p>B: Similarly this is supported by Lewisham Core Strategy policy 14 and policy TR1F-I in the emerging Lewisham Local Plan where development will need to demonstrate that it will not adversely impact on the function of Lewisham’s transport network. The size of the development should be clarified within the policy.</p>
<p>TC2 Improve Measures to Reduce pollution Levels</p>	<p>The Council generally supports this policy however there should be a threshold of the size of development that this applies policy applies to.</p> <p>Much of this policy is covered by existing London Plan (Policy SI 1) Lewisham Local Plan (Policy DM 23) as well as the emerging draft Local Plan (Policy SD6).</p> <p>3: Parking standards are set by the London Plan and the Local and Neighbourhood Plan will conform to these standards. It is also unreasonable to expect that all major schemes will provide underground parking and should be considered on a case by case basis.</p>
<p>TC3 Improve Active Travel Options and Road Safety Measures in the Forum Area</p>	<p>Rename to TC3 in the Policy Index</p> <p>Much of this policy is covered by existing London Plan (Policy T2) Lewisham Local Plan (Policy CS14) as well as the emerging draft Local Plan (Policy TR3).</p> <p>The Council supports the principle of this policy and the encouragement of active travel options and improving Road safety, however there needs to be a realistic threshold of size of development. The impact on the capacity or provision of road infrastructure could be as little as one residential unit and would therefore be unreasonable for the applicant to address all of the considerations outlined below.</p> <ol style="list-style-type: none"> <li>1. It is requested that the inclusion of French style crossing and their reason for being cheaper be removed. All crossing must comply with UK regulation.</li> </ol>

	<p>2. Similarly the provision of small traffic islands to reduce road width where it is 9 metres kerb to kerb will be subject to the relevant assessment process to determine whether or not it is appropriate</p> <p>9. Cycle storage provision is a project and not a policy. This could be added as a priority for Neighbourhood CIL spend.</p> <p>Although the Council supports increasing electric charging ports within the borough, this point would not reduce the road use from motor vehicles</p>
BHA1 Protection, Enhancement and Provision of Community Buildings	<p>A: The Council supports this policy however some modifications are recommended</p> <ol style="list-style-type: none"> <li>1. Include a defined timeframe for how long is considered reasonable for “efforts to be made to increase utilisation”</li> <li>2. No comment</li> <li>3. This is confusing, is this policy presuming that new community space will be achieved through new development?</li> </ol> <p>C: Provision for community space will be secured through s106 agreement with the developer and a suitable alternative can be agreed through this mechanism. The Council requests that the reference to Leegate centre be removed from this section.</p> <p>D: Local Retail and Economy Hubs are not a recognised designation and should be replaced with a formal designation as recognised through planning policy such as District Centres, Local Centres and Local Parades. There needs to be more clarity on where would be the most appropriate location for a particular type of community facility.</p>
BHA2 Protection, Enhancement and Provision of Social Infrastructure	<p>Although the Council understands the principle of this policy the identification of essential infrastructure is undertaken through the Local Plan process within the Infrastructure Delivery Plan which assesses future infrastructure need against projected population growth. S106/CIL is then used to fund these projects. This is further supplemented by all major development undertaken a series of assessments which aid the negotiation of S106 requirements. As this is a strategic issue we do not believe the neighbourhood plan does not have the scope to deliver “social infrastructure”.</p>
BHA3 Enhancement of Public Realm Facilities	<p>The public realm improvements discussed in this policy are more likely to be delivered through the Neighbourhood CIL program or similar council grant programs. It is recommended that the outcomes that this policy wishes to achieve be considered as an NCIL priority rather than a policy.</p>
BHA4 Housing Delivery	<p>A – Although this policy generally replicates London Plan and Local Plan policies it is less robust than both higher level policy documents. .</p>

	<p>A1: The policy should use recognised terminology such as affordable housing as found in Policy 3.10 of the London Plan. The wording of the policy is also confusing and should be modified. The strategic target of affordable housing in the London Plan policy H4 is 50%. It is recommended that the wording “at least minimum viable” is removed.</p> <p>A4: As noted in policy BAH2 anything that the plan considers to be social infrastructure will be delivered through the identified need realised in the Infrastructure Delivery Plan and funded through s106/CIL developer contributions.</p> <p>A5: This part of the policy is replicating a pre-existing mechanism regarding design scrutiny and can be removed.</p>
BHA5 windfall Sites	<p>1. What the definition is of underused within this policy? Who would define a particular site as being underused? Regardless of how well a site is or isn't used, it can still be identified as a small site/windfall site used for development.</p>
BHA6 Design of New Development	<p>This policy as written is confusing as it tries to combine a number of dispirit topics. We would recommend that this policy be removed from the plan.</p>
RLE1 Maintain, Improve and Sustain Diversity, Vitality and Viability of Retail Sites	<p>A: The council requests that the wording “proposals should” be amended to “proposals that require planning permission will be supported”</p> <p>Part 1 - Due to permitted development rights relating to changes in use class of town centre uses as defined in the NPPF this policy as written could not be implemented as policy cannot control as retail has a use class of E, any other use within the E use class can achieved through permitted development rights.</p> <p>Lewisham Council through Mayor and Cabinet have approved a non-immediate Article 4 Direction that removes permitted development rights for the change of use from Use Class E to Residential Use Class C3.</p> <p>B: It is requested that the text “will be resisted” be amended to “will not be supported”</p>
RLE2 Improve Shopfronts and Advertising in Retail Spaces	<p>A: The Council supports this policy and would like to see a more considered approach to shop front design as a whole, the policy needs to recognise that some aspects of shop front design will not need planning permission if the shop sits outside of a conservation area or is not part of a listed building.</p>

RLE3 Improve and Enhance the Public Realm of Retail/Cultural Activity Sites	The policy is too prescriptive and onerous and will not be deliverable for every development that meets the required policy threshold. The wording should include “where appropriate” or “should aim to” to allow a degree of flexibility.
RLE4 Protect and Encourage Local Employment Sites	<p>The Council supports this policy and its commitment to protecting and enhancing the land use of LEL sites, the plan is unable to secure property for a specific type of business or occupant.</p> <p>B. The wording in this policy needs to be modified to delete the word permitted and replace with “will be supported”.</p> <p>The use class B1c listed in part C and D of this policy are no longer considered and instead should be replaced by use class E as referred to in the new Use Classes Order in England which came into place in September 2020</p>
RLE5 Revitalise Lee Green District Town Centre	<p>A: The text “proposals should” should be amended to “proposals will be supported if encourage to”</p> <p>B: The Neighbourhood Plan is unable to set the requirement for the production of a masterplan through planning policy. It is recommended that this be removed from the policy section and included as a project. It also needs to be clear who will be responsible for the delivery of the master plan.</p>
HD1 Designation, conservation and Enhancement of Heritage Assets	National and Local Policy that protects heritage assets and conservation areas is already well established and therefore does not need to be replicated within neighbourhood planning policy. It is worth noting that non designated heritage assets are not afforded to the same protections as designated heritage assets at a local and national level.
HD2 Design and Scale of New Development	<p>A design and access statement is required to be submitted as part of the validation for all major developments in Lewisham and should be proportionate to the scale of the development.</p> <p>A3: The text “new development will be required to” should be amended to “new development will be supported or aim to”. Also front walls do not need planning permission if they are of a height of 1m or less so this section should be removed.</p> <p>C: Lifetime Homes Standard is no longer in place, correct terminology, London Plan Policy D7 Accessible Housing should be used as a replacement. .</p> <p>The text for this section should also be amended “should demonstrate” to “ will be supported”</p>

<p>HD3 Extensions, Alterations and New Buildings</p>	<p>It is recommended that this policy references the Lewisham Extensions and Alterations SPD.</p> <p>A1 – the council does not support this statement – there are many occasions where an extension or alteration of contemporary, contrasting palette of materials is an appropriate solution. Planning policies should not prescribe architectural style.</p> <p>A3 – this may not be required unless the property is identified as a heritage asset and/or in a conservation area.</p> <p>What is the status of the design guide and how does it interact with established SPDs such as the Extensions and Alterations SPD and Small Sites SPD? Much of opportunities outlined within the design guide in areas that are not Conservation Areas may not be enforceable as small extensions, alterations and front boundary treatments will fall under permitted development. Where planning permission is required, but not in a conservation area is there sufficient evidence within the Neighbourhood Plan to justify the opportunities and make a decision (say to refuse) on this guide?</p>
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**Table B – Site allocation comments**

Site Allocations	Officer comments
<p>SA01 – Land of Dacre Park</p>	<p>Through the consultation period, the Council have held discussions with the forum following a number of objections to this site. It has been agreed with the forum that this site allocation be removed from the plan completely and has been acknowledged that the inclusion of this site allocation in the submission version of the plan was indeed a mistake made by the forum</p>
<p>SA02 – Land on Old Road</p>	<ul style="list-style-type: none"> <li data-bbox="568 1094 2045 1230">i. As a requirement any proposed new development will have to submit a design and access statement as part of the validation process for the planning application which will address issues around “residential privacy”. The policy however should use recognised terminology such as overlooking. The Lewisham Council Small Sites SPD provides a clear expectation of the level of design expected in small site developments within the borough.</li> <li data-bbox="568 1270 2045 1302">ii. Who would be responsible for drafting a clear design code?</li> </ul> <p>There is no indicative capacity presented in the Site Allocation</p>

SA03 – Old Road Depot	<p>This is a Council owned site still in use, however after consulting with the capital programme delivery team there are no serious objections to this site allocation, however;</p> <ul style="list-style-type: none"> <li>i. If the wall is not nationally listed there is no guarantee that it can be protected through planning policy</li> <li>ii. As a requirement any proposed new development will have to submit a design and access statement as part of the validation process for the planning application which will address issues around “residential privacy”. The policy however should use recognised terminology such as overlooking. The Lewisham Council Small Sites SPD provides a clear expectation of the level of design expected in small site developments within the borough.</li> <li>iii. Who will produce the design code? Please reference the Lewisham Council Small Sites SPD.</li> <li>iv. There would need to be significant evidence to show why the building heights should not exceed adjacent buildings in height</li> <li>v. Please reference Lewisham Council’s Small Sites SPD</li> </ul> <p>There is no indicative capacity presented in the Site Allocation</p>
SA04 – Garage Site on Burnt Ash Hill	<p>This site has recently received planning permission REF DC/20/119025. It has since been removed from the emerging Local Plan. It is advised that the Neighbourhood Plan does the same.</p>
SA05 – Site of disused Garages on Wisteria Road	<ul style="list-style-type: none"> <li>i. As a requirement any proposed new development will have to submit a design and access statement as part of the validation process for the planning application which will address issues around “residential privacy”. The policy however should use recognised terminology such as overlooking.</li> <li>ii. The Lewisham Council Small Sites SPD provides a clear expectation of the level of design expected in small site developments within the borough. Who would be responsible for drafting a clear design code?</li> </ul> <p>There is no indicative capacity presented in the Site Allocation</p>
SA06 – Effingham Road	<p>Any development within a conservation area will be assessed on its own merits with particular consideration given to the impact the development will have on the built heritage in which surrounds it.</p> <p>There is no indicative capacity presented in the Site Allocation</p>

SA07 – Sainsburys Site	<p>This site allocation has been identified in the emerging Lewisham Local Plan as a major strategic site within the Borough and is required to meet its London Plan targets. The Council does not consider that the restrictive approach to design and particularly building heights would be consistent with London Plan policies including GG2 Making Best Use of Land or Policy D3 Optimising site capacity through the design- led approach.</p> <p>There is no indicative capacity presented in the Site Allocation The Council would advise the Forum to either A – Remove the site allocations to avoid confusion or B ensure the allocations are consistent with the draft Local Plan and add further local detail in an evidenced manner</p> <p>Part vi. This policy stipulates that building heights do not exceed adjacent building heights. This section should be deleted as there is no appropriate evidence to support this being included.</p> <p>There is no indicative capacity presented in the Site Allocation</p>
SA08 – Site at 321-341 Lee High Road	<p>This site allocation has been identified in the emerging Lewisham Local Plan as a major strategic site within the Borough and is required to meet its London Plan targets. The Council does not consider that the restrictive approach to design and particularly building heights would be consistent with London Plan policies including GG2 Making Best Use of Land or Policy D3 Optimising site capacity through the design- led approach. The Council would advise the Forum to either A – Remove the site allocations to avoid confusion or B ensure the allocations are consistent with the draft Local Plan and add further local detail in an evidenced manner.</p> <p>Viii Conservation areas proposed through the neighbourhood plan do not offer any protection and can therefore not be considered during a planning application.</p> <p>There is no indicative capacity presented in the Site Allocation</p>
SA09 – Disused Lockup garages of Burnt Ash Road	<p>i. As a requirement any proposed new development will have to submit a design and access statement as part of the validation process for the planning application which will address issues around “residential privacy”. The policy however should use recognised terminology such as overlooking. The Lewisham Council Small Sites SPD provides a clear expectation of the level of design expected in small site developments within the borough.</p> <p>ii. Who would be responsible for drafting a clear design code?</p>

	<p>There is no indicative capacity presented in the Site Allocation</p>
<p>SA10 – Leegate Shopping centre</p>	<p>The site allocation for the Leegate centre was submitted as part of the Reg 15 submission version of the neighbourhood plan meaning the Council did not have an opportunity to comment on this during the Reg 14 consultation. It is therefore recommended that this site allocation be removed from the plan.</p> <p>This site allocation has been identified in the emerging Lewisham Local Plan as a major strategic site within the Borough and is required to meet its London Plan targets. The Council does not consider that the approach to building heights is evidenced in an appropriate manner and do not consider the site allocation to be consistent with London Plan policies including GG2 Making Best Use of Land or Policy D3 Optimising site capacity through the design-led approach.</p> <p>.</p> <p>The council would also like to note its concern to rigid building height requirements without sufficient design development in accordance with London plan Policy D3. The detail of evidence provided through the SEA undertaken by ACEOM regarding the suitability of a 11 or 15 story structure at Leegate is considered to be insufficient to determine suitable building heights through this site allocation.</p> <p>There is no indicative capacity presented in the Site Allocation</p>
<p>SA11 – Garages on the corner of Millbank Way and Osberton Road</p>	<p>As a requirement any proposed new development will have to submit a design and access statement as part of the validation process for the planning application which will address issues around “residential privacy”. The policy however should use recognised terminology such as overlooking. The Lewisham Council Small Sites SPD provides a clear expectation of the level of design expected in small site developments within the borough</p> <p>There is no indicative capacity presented in the Site Allocation</p>
<p>SA12 – Vehicle Hire Corner of Lee High Road and Monor Park</p>	<p>i. As a requirement any proposed new development will have to submit a design and access statement as part of the validation process for the planning application which will address issues around “residential privacy”. The policy however should use recognised terminology such as overlooking. The Lewisham Council Small Sites SPD provides a clear expectation of the level of design expected in small site developments within the borough.</p>

	<p>Xii Conservation areas proposed through the neighbourhood plan do not offer any protection and can therefore not be considered during a planning application.</p>
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There is no indicative capacity presented in the Site Allocation