

Part B - Lee NP Regulation 16 consultation copies of submitted letters: Table of contents

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Date: 18 March 2022  
Our ref: 385887  
Your ref: Lee Neighbourhood Plan



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**BY EMAIL ONLY** - [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk)

T 0300 060 3900

Dear Sir or Madam

**Lee Neighbourhood Plan – REG 16, Strategic Environmental Assessment (SEA), Consultation Statement and Basic Conditions**

Thank you for your consultation request on the above documents dated and received by Natural England on 11<sup>th</sup> March 2022.

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

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made..

**Natural England does not have any specific comments on this draft neighbourhood plan, consultation statement and basic conditions document.**

**Screening Request: Strategic Environmental Assessment**

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

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

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

Natural England do not feel an SEA is necessary at this time.

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

Sharon Jenkins, Operations Delivery, Consultations Team, Natural England



planning.policy@Lewisham.gov.uk

3 April 2022

Dear Sir/Madam

### **Lee Neighbourhood Plan: Objection to proposed redevelopment of Dacre Park Allotments**

Despite having lived in the Lee/Blackheath Area for 10 years I have only recently become aware of the Lee Neighbourhood Plan (LNP). Overall I think that the LNP is a fantastic way in which to engage the community in the future of their environment and would agree with almost all of the principals and aims.

However, as an allotment plot holder at Dacre Park allotments I was alarmed to discover that despite the LNP stating that the Lee Forum Area was lucky to benefit from three allotment sites<sup>1</sup> and stating Dacre Park Allotments are well used urban green space which is not subject to change<sup>2</sup>; the LNP has proposed that an area of Dacre Park Allotments be allocated for residential development restricting vehicle access to the site.

This proposal is not stated explicitly within the LNP but included on page 81 within the plan in the boundary lines of SH01 and hence cannot have been subject to proper consultation within the community.

This proposal seems a contradiction to many of the strategic aims of the LNP which could only be justified as an error in the plan supporting this proposal (SH01).

As the LNP identifies, as a community we are incredibly proud and protective of the Green(land) within the Lee Forum area and hence my strong objection to proposal SH01 that seeks further reduction of a community asset currently providing health, social and recreational needs of an ever-expanding community<sup>3</sup>.

### **LNP support of allotment sites as community assets**

*The reason for a Neighbourhood Plan is to ensure that the green spaces, heritage, architecture, community assets and local amenities, which are so valued by the residents of the Lee Forum area, are protected and enhanced whilst ensuring that future developments help to create a cohesive, healthy and sustainable environment and encourage the creation of an ongoing history for the current and future benefit of all<sup>4</sup>.*

The LNP identifies the importance of allotment sites as a strength in the Lee Forum Area's Green and blue spaces<sup>5</sup>. Furthermore it identifies Dacre Park Allotments as a designated green space (number

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<sup>1</sup> 4.1.1 Green and Blues spaces – policy intent

<sup>2</sup> 4.1.4 table 2 Green space designations

<sup>3</sup> 4.3.1 Building Homes and Amenities policy intent

<sup>4</sup> Why do we need a Neighbourhood Plan for the Lee Forum area?

<sup>5</sup> 2.3 Green and Blue Spaces – Strengths, Weaknesses and Opportunities

19) which “*should be protected and enhanced. Development which results in the encroachment, loss or deterioration of any other existing designated green space and/or its biodiversity value will not be supported.....*”<sup>6</sup>

The LNP quotes in its Spatial vision that growth respects healthy streets along with protection and enhancement of built and natural heritage assets. It goes on to state that *the most valued aspect of living within the Lee Forum area is its community spirit. Residents feel that we belong to a diverse community that is also socially cohesive. This valued sense of community is encouraged and nurtured via its community infrastructure. However, there are fears that this infrastructure is reducing, with a number of community assets.... With the ever-expanding local population there is also concern that the available community facilities are not keeping pace with demand. We feel that current community buildings and social infrastructure need to be protected and increased..... Community infrastructure within the Lee Forum area needs to be future proofed to provide for and meet the health, social, recreational and educational needs of an ever-expanding community.*<sup>7</sup>

### **Dacre Park Allotments**

Dacre Park allotments is an allotment site at the heart of Lee Forum Area with a total of 44 plots<sup>8</sup> serving the local community. The site is highly oversubscribed with a waiting list of 10 years<sup>9</sup>. As well as providing health, social and recreational benefits to the community it also provides a wealth of bio-diversity.

The Dacre Park Allotment community comprise Lewisham residents within walking distance of the site. The ability to access the allotments on foot is only possible as there is storage and toilet facilities on site. The hard standing and vehicular access is used to facilitate deliveries eg manure or woodchip shared amongst plot holders as well as allowing plot holders to bring bulky items necessary for use of the allotments.

### **SH01 Proposal for development**

The LNP proposes that land off Dacre Park is allocated for residential development provided that access to the allotments from Dacre Park is maintained. It shows the area for development totalling 913.8sqm as shown below.

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<sup>6</sup> Policy GB1.A

<sup>7</sup> 4.3 Building Homes and Amenities – 4.3.1. Policy Intent

<sup>8</sup> <https://lewisham.gov.uk/myservices/environment/allotments/allotment-waiting-times>

<sup>9</sup> <https://lewisham.gov.uk/myservices/environment/allotments/allotment-waiting-times>

4.3.6.2 Policy SA01: Land Off Dacre Park, Adjacent to Allotments



**Objection to proposal SH01**

Of the land included within the proposal SH01 above 230 sqm belongs to Dacre park Allotments currently used a vehicular access, hardstanding and lockers – shown below in yellow.

The remaining 680sqm is a car parking for nearby flats but which also allow vehicular access to the allotments. Whilst the proposal suggests maintaining access it doesn't state that this is vehicular access and proposes to redevelop the portion of the allotments that would prevent vehicle access. In order to maintain vehicular access it would require a further 80sqm of the remaining 680 sqm through the middle of the plot – shown in blue below.



The reduction of allotment space for residential housing contradicts many of the aims, strategy and principles set out in the LNP. The LNP does not openly communicate that its housing strategy

includes building on allotment land (specifically other parts of the LNP state there is no change to Dacre Park allotments) and hence has not sought sufficient consultation with residents on this point.

Residential development on this plot as is recommended would be a material detriment to the facilities available at Dacre Park allotments, blocking vehicular access, removing toilet facilities and removing storage areas. This further erosion of community assets and green spaces is particularly inappropriate given the site has a 10 year waiting list the proposed site is better suited to an extension of Dacre park allotments which is more aligned to the principles of the LNP.

As the LNP identifies, *as a community we are incredibly proud and protective of the Green(land)and Blue(water)Spaces within the Lee Forum*<sup>10</sup> area and hence my strong objection to proposal SH01 that seeks further reduction of a community asset currently providing health, social and recreational needs of an ever-expanding community<sup>11</sup>

### ***Suggested amendment to LNP***

Of primary concern is the reduction of allotment space without clear communication of the LNP intentions in this regard. I would like to request that SH01 is removed from LNP and the suggestion of residential development on this site is removed.

As briefly mentioned in the LNP; allotments are a hugely valuable community asset promoting healthy sustainable communities. They are especially important within cities and, as demonstrated by huge waiting lists, they are extremely popular within the Lee Forum area. I would like to request that the benefit to the community of the allotment spaces within the Lee Forum area is given greater prominence in the LNP; that further weight is given to protecting the current sites and the identification of new allotments space should be included within the objectives.

The land highlighted within SH01 (that isn't already part of Dacre Park allotments) would be a fantastic site for further extension of Dacre Park Allotments. Such extension of the allotment would meet all the criteria and strategic principals in the LNP which would be a great increase in community green space in an area that currently serves no community purpose and is prone to fly tipping.

St Margaret's Lee Church of England primary school opposite the site could be given part of this extended allotments as a school allotment as they are currently trying to create growing space in tyres in parts of their small playground.

The LNP suggest that proposals that achieve improvements in terms of the following criteria will be supported:

1. A net gain in biodiverse green space.
2. Improvements to the landscape setting with no net loss of permeable ground.
3. Improved access to existing or new green spaces.

An extension to Dacre Park allotments would meet all these criteria to a greater degree than other proposals in the LNP and fit neatly into the Urban greening project in the LNP.

I look forward to hearing your response.

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<sup>10</sup> 4.1.1 Green and blue spaces policy intent

<sup>11</sup> 4.3.1 Building Homes and Amenities policy intent

Yours faithfully



4.3.6.2 Policy SA01: Land Off Dacre Park, Adjacent to Allotments



<b>Site Ref</b>	1
<b>Site Description / Address</b>	Land off Dacre Park, entrance serving access to allotments
<b>Current Use</b>	Car Park
<b>Proposed Land Use</b>	Residential
<b>Area</b>	0.09 ha 913.8 sqm
<b>Ownership</b>	Lewisham Council
<b>X Ref</b>	539422
<b>Y Ref</b>	175401
<b>SA Policy</b>	<p>Land off Dacre Park is allocated for residential development. Development proposals should consider the following design principles:</p> <ul style="list-style-type: none"> <li>i. Access to the allotments from Dacre Park is maintained;</li> <li>ii. Orientation and height of development does not detrimentally impact the light quality on the allotments;</li> <li>iii. Development should avoid land-locking the allotments, with some consideration on how the perimeter access all around is improved;</li> <li>iv. The development demonstrates how it will not give rise to an unacceptable level of harm to the residential privacy of adjacent properties;</li> <li>v. The development follows a clear design code that considers the restrictive nature of the small site.</li> </ul>



Planning Department, Lewisham Council  
Email : [planning.policy@Lewisham.gov.uk](mailto:planning.policy@Lewisham.gov.uk)

4 April 2022

Dear Sir/Madam

**Lee Neighbourhood Plan: Objection to proposal to development part of Dacre Park allotment site**

I have recently become aware of the Lee Neighbourhood Forum and Area and the Lee Neighbourhood Plan (“LNP”), although as I live within the Lee Neighbourhood Area, I am surprised that I have not previously received any communication about the Lee Neighbourhood Forum or the existence of the LNP.

While I support the general aim of engaging the local community in development plans, and I appreciate the need to build more affordable housing locally, I am extremely concerned to see that part of the existing Dacre Park allotments has been identified as a possible site for development for housing<sup>1</sup> and I consider that the proposal as outlined in the LNP to develop part of the allotment site would have a significant detrimental impact on this valuable green space. I note that I am not aware of any discussions with ploholders in relation to this proposal.

I appreciate that any development would be subject to the usual planning consent process, but the proposal to develop part of an existing allotment site seems to conflict with a number of the aims of the LNP. It would also make the allotments much more difficult to use (or even prevent their use) by many of the ploholders, particularly those who are elderly or have reduced mobility. I therefore wish to register my objection to the inclusion of part of the Dacre Park allotments in the proposals for housing development. I have set out the background and further detail below.

**1 The Dacre Park allotments site is a green space and community asset**

The Dacre Park allotments site comprises 44 plots<sup>2</sup> serving the local community. The site is heavily oversubscribed with a long waiting list and waiting time for a plot of approximately 10 years<sup>3</sup>. As well as providing health, social and recreational benefits to the community, the site also encourages biodiversity.

The LNP explains that *“The reason for a Neighbourhood Plan is to ensure that the green spaces, heritage, architecture, community assets and local amenities, which are so valued by the residents of the Lee Forum area, are protected and enhanced whilst ensuring that future developments help to*

<sup>1</sup> Section 4.3.6.2 Policy SA01 on page 81 of LNP and attached as an Appendix

<sup>2</sup> <https://lewisham.gov.uk/myservices/environment/allotments/allotment-waiting-times>

<sup>3</sup> <https://lewisham.gov.uk/myservices/environment/allotments/allotment-waiting-times>

*create a cohesive, healthy and sustainable environment and encourage the creation of an ongoing history for the current and future benefit of all*<sup>4</sup>.

The LNP identifies allotment sites as a strength in the Lee Forum Area's Green and Blue spaces<sup>5</sup> and identifies Dacre Park Allotments as a designated green space (19) which *"should be protected and enhanced"* (Policy GB1 A) and notes that *"Proposals that achieve improvements in terms of the following criteria will be supported ... 3. Improved access to existing or new green spaces"* (Policy GB1 B). It notes that *"... as a community we are incredibly proud and protective of the Green(land)and Blue(water)Spaces within the Lee Forum ..."*<sup>6</sup>.

The LNP quotes in its Spatial vision that growth should respect healthy streets along with protection and enhancement of built and natural heritage assets. It also states that *"... the most valued aspect of living within the Lee Forum area is its community spirit. Residents feel that we belong to a diverse community that is also socially cohesive. This valued sense of community is encouraged and nurtured via its community infrastructure. However, there are fears that this infrastructure is reducing, with a number of community assets.... With the ever-expanding local population there is also concern that the available community facilities are not keeping pace with demand. We feel that current community buildings and social infrastructure need to be protected and increased..... Community infrastructure within the Lee Forum area needs to be future proofed to provide for and meet the health, social, recreational and educational needs of an ever-expanding community."*<sup>7</sup>

This all points to the importance of preserving and enhancing the existing green spaces and community assets, rather than reducing their size and facilities.

## **2 Development proposal 4.3.6.2 Policy SA01**

In addition to the individual plots for cultivation, the Dacre Park allotments site currently has toilet facilities and some secure storage (in the form of individual lockers) with a small adjacent area of hard standing. The secure storage allows plotters to store tools etc on-site, encouraging plotters to walk to the site (where they are physically able to do so) rather than drive as they do not need to bring heavy tools etc each time they visit. The small area of hard standing next to the lockers and vehicular access is used:

- (i) to facilitate bulk deliveries e.g. manure, mulch, chippings etc shared amongst plotters;
- (ii) by plot holders to bring bulky items necessary for use at the allotments on to the site; and
- (iii) for parking by plotters who need to drive to the site because, for example, they live further away or are elderly and find it difficult to walk.

The LNP proposes at 4.3.6.2 Policy SA01 that 913.8m<sup>2</sup> of land off Dacre Park is allocated for residential development (as shown in the first diagram below). While the part of the allotment site that contains the plots for cultivation is apparently to be protected, close inspection of the proposal shows that it includes developing 230m<sup>2</sup> of the Dacre Park allotments site being the vehicular access, hard standing and locker area as shown on the second diagram below in yellow. The text on page 82 of the LNP (see Appendix) does not refer to the fact that this proposal will involve a reduction in the size of the allotment site.

<sup>4</sup> Why do we need a Neighbourhood Plan for the Lee Forum area?

<sup>5</sup> 2.3 Green and Blue Spaces – Strengths, Weaknesses and Opportunities

<sup>6</sup> 4.1.1 Green and blue spaces policy intent

<sup>7</sup> 4.3 Building Homes and Amenities – 4.3.1. Policy Intent

#### 4.3.6.2 Policy SA01: Land Off Dacre Park, Adjacent to Allotments



The remaining 680 m<sup>2</sup> of the 913.8m<sup>2</sup> proposed development site is the existing car park for the nearby flats. This car park appears to be rarely used by the residents in the flats for parking (although is being used by the Council for storage of equipment while works are underway at the flats) and is prone to fly tipping. Critically, however, it provides the only existing vehicular access to the allotments and whilst the proposal notes that maintaining access to the allotments is one of the design principles that should be considered in any development, it does not specify what level of access is required.

The secure storage on the site is a valuable amenity and if this is removed it would mean that ploholders have to transport tools etc to the allotments each time they visit as they would no longer have anywhere secure to store these. The toilet facilities would also be removed.

If the vehicular access and hard standing are removed this would mean that ploholders could only access the site on foot which would prevent bulk deliveries of manure, etc and effectively limit the

pool of ploholders to those who can walk to their plot or, if they need to drive for some reason, either have a BHA resident's parking permit (I have such a permit but very few others do) or are prepared to pay to park on Dacre Park itself. If the existing vehicular access to the allotment site is preserved, this would require access through the 680sqm part of the plot, e.g. as shown in blue above.

The reduction of allotment space for residential housing contradicts many of the aims, strategy and principles set out in the LNP, including specifically policy GB1 noted in section 1 above. The LNP does not make it clear that this part of its housing strategy includes building on allotment land – this is only visible when the diagrams are examined in detail - and there has been no consultation with ploholders. The LNP suggests that allotments should be preserved, yet this proposal does just the opposite as it proposes to reduce the size of the site and does not consider the need to (i) retain the small but valuable non-growing space contained within the current allotment site (ii) preserve the current level of access to the plots.

In summary, residential development on this site would cause a significant detriment to the facilities available at Dacre Park allotments, blocking vehicular access, removing toilet facilities and storage areas, as well as being an erosion of community assets and green space providing health, social and recreational needs of an ever-expanding community<sup>8</sup>.

### **3 *Objection to the current proposal in the LNP and alternative suggestion for the space***

In conclusion, I wish to register my objection to the inclusion of part of the Dacre Park allotments within the proposed housing developments.

The existing car park highlighted within SA01 is not well used and could instead be used as an extension of the Dacre Park allotments site, with the existing vehicular access preserved at one side. Alternatively, St Margaret's Lee Church of England primary school opposite the site could be given part of this site as a school garden. Creation of an additional green space from a currently underused car park would meet the criteria and strategic principles in the LNP.

I look forward to hearing your response.

Yours faithfully

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████████████████████

<sup>8</sup> 4.3.1 Building Homes and Amenities policy intent

## Appendix

### 4.3.6.2 Policy SA01: Land Off Dacre Park, Adjacent to Allotments



<b>Site Ref</b>	1
<b>Site Description / Address</b>	Land off Dacre Park, entrance serving access to allotments
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<b>Area</b>	0.09 ha 913.8 sqm
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<b>X Ref</b>	539422
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planning.policy@Lewisham.gov.uk

6 April 2022

Dear Sir/Madam

**Lee Neighbourhood Plan: Objection to proposed redevelopment of Dacre Park Allotments**

Despite having lived in the Lee/Blackheath Area for 10 years I have only recently become aware of the Lee Neighbourhood Plan (LNP). I was delighted to read the plan and agree with many of the aims but wanted to highlight an area which I don't think goes far enough and doesn't deliver on the aims of air quality improvement.

Clearly the need for improved air quality should be high on the agenda within the Lee Neighbourhood Plan. Part of the Lee Forum Area includes Lewisham – the first borough in which a girl has died from poor air quality.

I acknowledge the aims and objectives set out in the plan but the area which feels underrepresented is Electric vehicle charging. Whilst the plan aims for *Increase capacity for less polluting forms of transport*<sup>1</sup> and electric charging point for vehicles within 100m of all residential homes<sup>2</sup> - it doesn't sufficiently acknowledge the importance of electric charging infrastructure or set out any strategy for achieving it.

As I am sure you are aware, Lewisham council aims for electric charging points within 500m of homes and has a woeful process to fulfil this. Lewisham council will not permit any home charging unless the property has off-street parking. The Lee Neighbourhood Plan objects to car parking on front lawns. Given the above how will the area make any way forward to develop electric charging infrastructure for everyone other than those in the largest properties?

Low average speed of vehicles and the high levels of pollution on certain routes (due to LTN) means that the Lee Forum Area is perfect to benefit from early adoption of electric vehicles. Early adoption can only be achieved with investment in EV charging infrastructure which is severely lacking in Lewisham. EV owners ideally want to charge their cars at home (because its cheaper and easier) and the only way to do this in Lewisham is to create a charging point on front lawns contrary to the Lee Neighbourhood Plan recommendations to *retain intact boundary walls and re-instate boundaries with railings and walls*. Those without front lawns can only access public chargers or breach council rules on running leads over pavements.

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<sup>1</sup> 4.2.3

<sup>2</sup> Policy TC3

I would like to see the Lee Neighbourhood Plan amended to set out how it plans to achieve public EV charging infrastructure within 100m of properties. I would also like to see the inclusion of alternatives to home charging that does not require the conversion of front lawns to driveways.

The solution is a cable gully or channels that safely permit cables to run through pavements (paid for by the homeowner) as trialled by oxford city council. Further details can be found at <https://evolutionsolutions.co.uk/cable-gully-ev-solution/> and <https://green-mole.co.uk/ev-charging-for-terraced-households/>. This, together, with public EV charging would increase EV adoption without a cost to the street landscape.

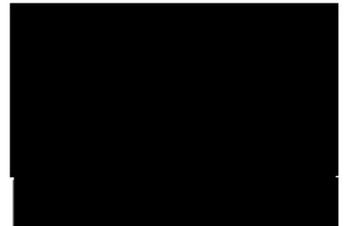
I would be grateful if you could consider this recommendation in an amended Lee Neighbourhood plan.

Yours faithfully

A solid black rectangular box used to redact the signature of the sender.

MACEY & CO

Terence Macey LLM  
Solicitor



Our Ref: TJM/FW MS. 94

22 April 2022

Strategic Planning  
Laurence House  
1 Catford Road  
Catford  
London  
SE6 4RU

*By post and email: [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk)*

Dear Sirs

**Lee Neighbourhood Plan Consultation**  
**106 Manor Way, Blackheath ("the Huntsman") and access from Moorehead Way**

Further to my letter of 21 April, I set out on a single sheet Derreb's response which please lodge.

Yours faithfully

A handwritten signature in black ink, appearing to be 'TJM'.



Enc

The Huntsman is a privately owned development site zoned for residential development.

Three planning applications have been made to the Royal Borough of Greenwich ("RBG"). None were decided by RBG and all went to appeal on the basis of non-determination.

A fourth planning application is being prepared in consultation with RBG. There have been three pre-application meetings with RBG to develop the proposals. Currently, a response is awaited from RBG following the last pre-application meeting. Once RBG grants suitable planning permission, high quality and much needed new homes can be built.

Dated: 22 April 2022

Lodged on behalf of Derreb Limited



TfL Spatial Planning Reference: CBRO/22/1  
- by e-mail only -

Transport for London  
City Planning

5 Endeavour Square  
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5600

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17/04/2022

Dear Lee Neighbourhood Forum,

## **RE: Lee Neighbourhood Development Plan**

Thank you for consulting Transport for London's Spatial Planning team on the draft Lee Neighbourhood Development Plan. Our role is to consider the strategic transport aspects of growth and development in the statutory context of the London Plan and on behalf of the Mayor of London. We also aim to ensure that our operational interests including transport infrastructure, land, services and future transport projects as well as impacts on the Transport for London Road Network are taken into account when Neighbourhood Plans are prepared. As you will be aware the Neighbourhood Plan should be in general conformity with the London Plan (2021). We have therefore considered your draft in this context.

The comments below summarise our views on the Plan, which is a revised one from the document on which we commented on in 2019. Please note these comments represent the views of TfL Spatial Planning officers (only) and are made on a "*without prejudice*" basis. They should also not be taken to represent an indication of any subsequent Mayoral decision and they do not necessarily represent the views of the Greater London Authority (GLA).

### **Neighbourhood Area Context**

The strategic transport context of the Neighbourhood Plan Area (hereafter referred to as the Area) includes:

- A20 Lee High Road, A2213 Sidcup Road and A205 Westthorne Avenue, all of which form part of the Transport for London Road Network (TLRN). A20 Lee High Road runs east to west across the Area. A2213 Sidcup Road forms part of its eastern boundary with A205 Westthorne Avenue (the South Circular) forming the southern boundary. The remainder of the public highways to the west of the Plan Area are the responsibility of Lewisham Council while those to the east are the responsibility of the Royal Borough of Greenwich.

- Two National Rail stations, Hither Green and Lee. These are serviced by Southeastern rail services. Lewisham and Blackheath stations are both within reasonable (PTAL) walking distance of parts of the neighbourhood.
- Bus routes: 122, 178, 180, 202, 261, 273, 321, 621, B16, N21. There are additional bus services just outside the area, notably In Lewisham town centre
- Part of the local cycling network (LCN+) on A20 Lee High Road. There are several Greenways that run through the Plan area.

In consequence of the above public transport provision most of the neighbourhood has a PTAL of 3 with the rest ranging between 1a, 1b, 2 and 4.

### **General Comments**

#### Healthy Streets

TfL welcomes the explicit reference to the Mayor's Healthy Streets approach in Lee Forum Area Appraisal Section 2.5, Section 3.1, Spatial Principle 3, 4.2.3 Objectives, Policy TC3, Section 4.2.6 and Policy RLE3. We have adopted the Healthy Streets Approach to improve air quality, reduce congestion and help make London's diverse communities greener, healthier and more attractive places to live, work, play and do business. We encourage the use of the Healthy Streets diagram to further support the policies set out in the Plan.

There is a Healthy Street Neighbourhood Scheme (HN) proposed by London Borough of Lewisham called 'Lewisham and Lee Green HN', which encompasses the majority of the Area. There is no funding available for a permanent scheme at present. As a result of the COVID-19 pandemic, the borough has delivered a package of temporary measures in Lewisham and Lee Green, implemented using a temporary traffic order. Key aims of the scheme are to reduce rat running through the area, reduce collisions and to encourage more walking and cycling. These aims align with those identified within the Plan, and therefore the Forum should ensure that their plan aligns with the HN scheme.

#### Vision Zero

The Mayor and TfL have committed to delivering a 'Vision Zero' approach in London to make streets safer and seek to eliminate deaths and serious injuries on London's transport networks. We welcome the references to Vision Zero throughout the plan, particularly in the 4.2.3 Objectives section. We encourage a reference to Vision Zero to be integrated into the Spatial Principles and Spatial Vision. It is neither inevitable nor acceptable that anyone should be killed or seriously injured when travelling in London and embedding the Vision Zero action plan into local policy will reduce road danger for everyone and create safe streets for walking and cycling.

Vision Zero policies and practices should be considered as part of the Forum's proposals for highway and related improvements including for example, those to key junctions, road crossings and key routes (Policy TC3 (1)); improving pedestrian crossings (Area Appraisal 2.5); providing small traffic islands to reduce the width of the

roadway (Policy TC3 (2)) and prioritising improvements and crossings along identified walking routes (Policy TC3 (5)). Vision Zero is also an important consideration for emerging development proposals that generate vehicle, pedestrian and cycle trips and which have new or altered accesses onto the highway, laybys and similar infrastructure.

### The London Plan

The proposed Neighbourhood Plan includes references to the draft London Plan. It should be noted that the London Plan was published/adopted last year (2021). Therefore, for clarity any reference to a draft London Plan should be updated to the 2021 London Plan.

### Buses

Buses are key to delivering Healthy Streets and achieving strategic mode share targets. Ten day and/or night bus routes operate within the Lee Neighbourhood Plan area and there are others serving stops nearby. The draft Neighbourhood Plan contains policies and further actions which would result in amendments being made to the highway network. It would be useful if the Plan included a reference which recognised that an accessible bus network is reliant on maintaining good and reliable bus journey times, and that any changes to road layouts, such as through the creation of traffic islands and improving key junctions, should not adversely impact bus operations directly or indirectly, and should maintain or improve journey times. All highway changes should also at least retain, if not improve, existing bus stops and stands within the area and ensure that they meet current TfL standards and guidance as set out in Accessible Bus Stop guidance and any further subsequent guidance.

### TfL Green Assets

There are many street trees and trees on open spaces within the Area, including TfL trees located on Lee High Road, Eltham Road and Westthorne Avenue. As highlighted in the London Plan and the Mayor's Transport Strategy 2018 (MTS) there are multiple benefits associated with green infrastructure which includes improved resilience to severe weather and climate change, better air and water quality, the encouragement of walking and cycling, and enhanced biodiversity. In light of this, every effort must be made to protect existing green infrastructure and the Plan should also promote additions and improvements to this green infrastructure. to deliver a net gain in biodiversity.

Any works involving or impacting TfL trees will need to be agreed with TfL, this includes, inter alia, felling, lopping, pruning and excavation. As noted above TfL would be in principle opposed to any proposal which resulted in the loss of one or more of its trees or otherwise adversely impacted our green infrastructure. New planting on the TLRN should also be agreed with TfL. The costs of works to the trees and the maintenance and management of new planting on the TLRN will need to be covered by the Forum or other party rather than TfL.

### Detailed Comments

## Spatial Principles

It is welcomed that a healthier public realm in line with the Mayor's Healthy Streets Approach has been included in Spatial Principle 3. It is also welcomed that opportunities for active and sustainable travel, limiting over-reliance on cars has been introduced. This aligns with London Plan Policies T1 and T2.

### **Strategic Spatial Principles – Spatial Principle 1: Green Infrastructure-led development**

TfL welcomes the inclusion of improving opportunities for active travel such as walking and cycling in the Plan area. This will support the achievement of the Mayor's strategic target for 80 per cent of journeys within London to be made by walking, cycling or public transport by 2041.

It is useful to highlight that green infrastructure led development is not the only way in which the Area can improve opportunities for active travel, and that the creation of high-quality public realm and creative urban design at new developments can also support an uptake in active travel modes. TfL suggest that the Plan refers to supporting an increase in active travel modes through high quality urban design within the Heritage and Design chapter, with references included within the strategic aim, objectives and policies.

### **Strategic Spatial Principles – Spatial Principle 3: Accessible and connected social-cultural nodes of retail and social activity**

We welcome the reference to the Healthy Streets approach that has been made within this principle.

We also welcome that the Plan proposes identifying opportunities for healthier public realm and new and improved active and sustainable travel around retail and social activity nodes. This aligns with Policy T1 Strategic Mode Shift target and Policy T2 reducing car dominance, both stationary and moving, on London's streets.

#### **4.1 Green and Blue Spaces**

It is welcomed that this policy aims for increased street planting and greening with trees, shrubs, rain gardens and other green infrastructure so that they provide multiple benefits in terms of sustainable drainage, reduced air pollution, and improved experience and opportunity for walking and cycling. In line with London Plan Policy T2, it is recommended that footway widths are at least maintained, if not widened, to be in line with TfL's Pedestrian Comfort Guidance.

### **Policy GB2 Achieving a Green Infrastructure-led Development Approach**

TfL supports the principle of seeking to use tree and shrub planting as a means of slowing down traffic in appropriate locations. However, we would want to be consulted about any proposals affecting TfL bus routes to ensure that we can maintain service frequency and reliability. Further TfL's consent would be required for such measures on the TLRN and given the function of this highway particular care will be needed to ensure that the safe and efficient operation of the TLRN and its use by all modes is not adversely impacted.

## **4.2 Transport and Connectivity**

TfL is supportive of the strategic aim to improve air quality, road safety, the vibrancy of our streetscapes, and encourage active travel in and around the Lee Neighbourhood area, by providing easy access to more environmentally friendly and healthy modes of transport. These aims align with London Plan Policies T1 Strategic Mode Shift, T2 Healthy Streets, Policy T4 Assessing and Mitigating Transport Impacts and the Mayor's Vision Zero objectives.

### **Objectives**

In general, TfL welcomes the inclusion of transport objectives which seek to improve public transport accessibility; improve the walking and cycling environment; improve road safety and reduce car dominance within the Area.

It is noted that the Neighbourhood Plan includes an objective to 'Reduce the number of motor vehicle journeys on roads within the Lee Forum area'. This is welcomed and in line with the strategic policy direction. It is useful to highlight that the MTS requires boroughs to produce traffic reduction strategies, and the Forum should consider what role the Neighbourhood Plan can play in helping to implement this.

However, it is considered that objective four, which seeks to 'Reduce the pressure of on-street parking spaces for residents and visitors to the neighbourhood' would benefit from further clarification as it is unclear what mitigation measures will be put in place to achieve this. It is useful to highlight that TfL would not support an increase in parking provision within the area, as it would be contrary to London Plan Policy T6.

The achievement of these objectives will very much depend upon the actions and funding of TfL, NR and others and we would suggest that the wording in the plan reflects that the Forum would be seeking such improvements and offer to work with the relevant providers to enable such improvements where possible.

### **4.2.4. Identification and Mapping**

Three sections of Lee High Road have been identified as 'Street Improvement Zones'. TfL would welcome further clarity on the type of improvements that the Plan seeks to implement in the identified zones. As highlighted above, Lee High Road forms part of the Transport for London Road Network (TLRN), therefore any works including to the footways will need to be approved by TfL. This also applies to Sidcup Road and Westthorne Avenue. Lewisham and RBG would need to agree improvements to borough highways.

Any improvements to the public realm or highway generally within the Neighbourhood area should be in accordance with the Healthy Streets approach and prioritise walking and cycling movement, in line with London Plan policies and the Mayor's Transport Strategy.

## **Policy TC1 Protect, Promote and Enhance Public Transport**

TfL recommend that Policy TC1 A is expanded to include proposals that improve access to public transport more generally, for example enhancing existing walking and cycling routes that will help to increase public transport access in the area (as well as active travel).

It is supported that new developments that are likely to cause a negative impact on the capacity of existing travel options should demonstrate through Transport Impact Assessments how this impact will be addressed. It should be noted that if a development will create an adverse impact on a TfL asset or service, mitigation from the developer may be required, in line with London Plan Policy T4. It is recommended that a reference that the TA should be prepared in line with TfL guidance, including the preparation of an Active Travel Zone assessment, is included.

### **Policy TC2 Improve Measures to Tackle Pollution Levels**

In general, TfL is supportive of the Policy TC2 which seeks to ensure that developments within the Area make a positive contribution to improving air quality and reduce noise pollution.

Policy TC2 1 seeks to maximise the contribution that the public realm makes to encouraging active travel. This is central to the Mayor's Healthy Streets Approach as detailed in London Plan Policy T2. Policy TC2 1 mention avoiding an over-reliance on street parking. TfL would not be supportive of an increase in car parking provision either on or off street but would be supportive of a reduction instead. Car parking for new development should not exceed London Plan maximum standards, outlined in Policy T6.

Policy TC2 2 seeks to encourage a reduction in the use of private vehicles and to reduce parking provision, which is supported and in line with the London Plan. Any parking should not exceed the maximum standards set out in London Plan Policy T6. Policy TC2 2 also aims to encourage a reduction in the use of private vehicles using car club vehicles. Car clubs share many of the negative characteristics of private car use and thus careful consideration of the pros and cons of such schemes is suggested. In new developments, Car Clubs count towards the maximum parking ratios permitted in Policy T6 because they share many of the negative impacts of privately-owned cars.

Policy TC2 3 states that proposals should reduce private vehicle use by only providing private parking spaces off street. As above, any car parking provision proposed must be consistent with London Plan Policy T6 which aims to minimise parking and we recommend that a reference to this is included in this policy.

The Plan should identify 'strategic neighbourhood routes' that are being referred to in Policy TC2 4.

TfL welcomes the principle of Policy TC2 5 to reduce barriers to cycling by ensuring that all new developments and public realm provide safe, secure routes. Any proposed route should be in line with the London Cycling Design Standards, TfL's Streetscape Guidance and Pedestrian Comfort Guidance. All new development should ensure that the provision of cycle parking is at least in line with the London Plan minimum

standards and designed in accordance with the London Cycling Design Standards (LCDS), as also required by Policy T5.

Policy TC2 6 references that car parking should not dominate front gardens. Such use is contrary to healthy streets principles and to be provided in line with Vision Zero, we consider that any front garden parking should have sufficient space for a vehicle to enter and exit the highway network in forward gear.

### **Policy TC3 Improve and Encourage Active Travel Options and Road Safety Measures in the Plan Area**

In general, TfL supports the Neighbourhood Plan's policy seeking improvement to road safety and encouraging active travel. This is in line with the Mayor's Vision Zero objective.

Policy TC3 1 and 2 mentioned improvements to junctions and road crossings and reduction of roadway widths. Further engagement with TfL is required for any changes to the highway network where there are any bus stops or routes. Any proposals for the TLRN will need to be approved by TfL. Early engagement with TfL on this is essential.

Policy TC3 4 references continuing to provide parking for shops. In line with Policy TC1, people should be encouraged and enabled to access shops by walking, cycling or public transport. As above, any parking provision should not exceed the maximum standards in London Plan Policy T6.

TfL is supportive of giving pedestrians the maximum possible space and accessibility. Along with the reference to the Disability Discrimination Act 1995 guidance on pavement widths and furniture, it recommended that a reference to TfL Streetscape and Pedestrian Comfort guidance is included. This provides information regarding recommended pavement widths for different types of pedestrian flows to facilitate those from all walks of life to safely and comfortably travel along the road/footway network, in line with the Healthy Streets approach (London Plan Policy T2).

Please see our previous comments on 'car clubs' in Policy TC3 8.

TfL welcomes that proposals will be supported that help to secure the aim of all residential homes being within 100m of: safe and secure cycle storage (involving residents in the positioning of these) ii. An electric charging point for vehicles. All new development should ensure that the provision of cycle parking is at least in line with the London Plan minimum standards and designed in accordance with the London Cycling Design Standards (LCDS). Provision of electric vehicle charging points should be in line with London Plan Policy T6. On highway or public realm provision of cycle storage and EVCP should take into account TfL Streetscape and Pedestrian Comfort guidance and ensure that bus operations are not adversely impacted. As previously advised TfL would need to agree any works to the TLRN.

Clarification on the 'identified walking routes' should be provided. Please can further information on identified walking routes be provided – a map and list with summary details would be helpful.

#### **4.2.6 Recommended Further Actions**

The Transport chapter of the Neighbourhood Plan contains several further actions that are relevant to TfL. These actions, and TfL's response can be found in the below table.

<b>Recommended Further Action</b>	<b>TfL's Response</b>
New Bus Routes implemented, and existing routes extended.	TfL will investigate the feasibility of extending bus routes. However, to maintain an efficient network within our budget, we are unable to provide connections between every origin and destination. We will continue to rely on customers interchanging between buses or with rail to arrive at their destination. In certain circumstances when there appears to be a large number of customers wishing to travel between two destinations, TfL will complete a detailed investigation.
Improve Bus Frequency	<p>We are unable to fund an increase in the frequencies of all routes and especially given our existing funding situation will carefully consider proposals for such increases and their justification. Our aim is to match capacity to demand to avoid overcrowding within the budget we have available. Unfortunately, this may also include the need to reduce frequencies in some cases where there is limited demand in relation to supply.</p> <p>The network is kept under constant review, and we do consider customer feedback during our decision-making process.</p>
Buses should be accessible and user friendly	All TfL buses are low floor and wheelchair accessible enabling all customers to board and alight any bus.
Encourage the cycle docking stations network used in central London to expand to Lewisham	TfL would support in principle extension of the Santander Cycle Hire scheme to the Area. However, we have no funding identified for this expansion and there will need to be a considerable number of docking stations installed further west and north to bridge the gap between the boundary of the existing network in Southwark (and the Isle of Dogs) and Lee.
Work with councils and TfL to improve understanding and enforcement of vehicle speed limits in the forum area. Work with councils, TfL, the local community and other groups to	<p>As highlighted above, the Mayor and TfL have committed to delivering a 'Vision Zero' approach in London to make streets safer.</p> <p>TfL would welcome further engagement with the Forum on this matter. Consideration should be given</p>

Recommended Further Action	TfL's Response
ensure both safe pavements and safe cycling.	<p>to the installation of temporary/short-term measures for trialling interventions that could support achieving this action.</p> <p>The Plan may wish to review TfL's 'Small Change, Big Impact – A practical guide to changing London's public spaces' which can be accessed from the following link: <a href="http://content.tfl.gov.uk/small-change-big-impact.pdf">http://content.tfl.gov.uk/small-change-big-impact.pdf</a> Funding opportunities should be identified at an early stage for these works to enable delivery. TfL does not have any identified contribution which could be made available.</p>
Work with the local community to develop proposals for Lee High Road and Lee Green Crossroads, including improved pedestrian environment, safe crossings and environmental enhancements	<p>In general, TfL is supportive of improvements to the public realm. Any improvements to the public realm should be in line with the Healthy Streets approach identified within London Plan policy T2.</p> <p>As highlighted above, TfL is the highway authority for Lee High Road therefore any improvements will need to be agreed with TfL. TfL would welcome further discussion.</p> <p>It should be noted that TfL has no funding currently for these works and thus a key part of any project development would be to identify funding sources such as Neighbourhood CIL.</p>
Work with boroughs to increase cycle storage provision outside schools to discourage driving to school.	<p>TfL strongly supports an increase in cycle storage both on school sites and outside. This should include provision for children, staff, parents/carers and visitors. It is recommended that any scheme meets the London Cycling Design Standards (LCDS) and TfL's Streetscape guidance. Scooter storage for younger children and cargo and trailer bike parking should also be considered.</p>

### **Site Allocations**

TfL requests that the site allocations for Site 7 (Sainsbury's Site) and Site 8 (Site at 321-341 Lee High Road) are revised to ensure that the current vehicular access remains unchanged or alternatively commit to design and modelling work to demonstrate that any development that may come forward on this site will not have a detrimental impact on the safety and function of the TLRN. Any development should

support the creation of active frontages along Lee High Road, in line with the Mayor's Healthy Streets approach.

### **Locally Specific Design Guidance for A2 – Lee High Road**

TfL is generally supportive of public realm improvements along Lee High Road, in line with London Plan Policy T2. It is recommended that any proposed public realm improvements adjacent to the TLRN is discussed with TfL as highway authority and designed in line with the Healthy Streets approach. Proposals in respect of the TLRN itself must be agreed with TfL. Any introduced cycle parking and street furniture should take into account the London Cycling Design Standards (LCDS), TfL's Streetscape guidance and Pedestrian Comfort guidance.

### **Locally Specific Design Guidance A7 – North East Lee**

The Plan states that 'car parking spaces, where allowed, should be designed sympathetically and in keeping with the building and the area, and should not dominate and result in the entire removal of front garden space and planting.' As noted elsewhere, it is recommended that any car parking provision is in line with London Plan Policy T6 and that, in line with Vision Zero, sufficient space for vehicles to turn around on-site is a condition of a front garden parking space. The amenity and sustainability impact of front garden parking should also be carefully considered.

### **Public Realm and Active Travel Improvements**

TfL is generally supportive of the aims, objectives and actions in this section. We would welcome reference to the Mayor's Vision Zero objective along with the Healthy Streets approach, particularly within the outlined objectives. We welcome the action of providing Legible London signage in the Plan Area, for which funding should be identified. As set out previously, we would like to be consulted on any changes to the road layout and traffic calming measures identified in this section and must agree if these changes relate to the TLRN. This is to mitigate any impacts on bus services in the area and also to help encourage active travel.

I hope you find these comments useful and take them into consideration. If you have any queries, or require further clarification, please do not hesitate to contact me.

Yours sincerely

Alexandra Weir

**TfL Spatial Planning**

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Date: 27 April 2022  
Our reference: I1095419

Dear Sir/Madam,

## Representation to Regulation 16 Consultation of the Lee Neighbourhood Plan

On behalf of GHL (Leegate) Limited (hereinafter 'GHL'), Knight Frank hereby submit representations in respect of the Regulation 16 Consultation of the Lee Neighbourhood Plan, which runs from 11<sup>th</sup> March to 6<sup>th</sup> May 2022. GHL have a major land interest within the Neighbourhood Plan Area; this being the Leegate Centre (otherwise known as the Leegate Shopping Centre), Lee Green, Lewisham London, SE12 8SS ('the Site'), which is allocated in the draft Neighbourhood Plan under Policy SA10 (Leegate Shopping Centre) as well as the adjacent disused garage redevelopment site which is allocated under Policy SA09 (Disused lockup garages off Burnt Ash Road).



Figure 1. Land owned by GHL.

It is acknowledged that the Lee Neighbourhood Planning Area and Forum ('the Forum') published a pre-submission consultation (Regulation 14) in May 2019. Subsequently, the Forum have now submitted a proposed Neighbourhood Plan and Strategic Environment Assessment ('SEA') to the London Borough of Lewisham ('LBLE') and the Royal Borough of Greenwich ('RBG') for Regulation 16 Consultation.

This representation letter provides comments on the Regulation 16 version of the draft Neighbourhood Plan and accompanying SEA. GHL strongly supports the inclusion of the Site in the draft Neighbourhood Plan and supports the

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neighbourhood planning process. It is important to recognise that our comments are intended to help the Neighbourhood Plan meet the basic conditions to permit the Neighbourhood Plan to proceed to referendum stage.

## GHL (Leegate) Limited

As noted above, GHL has a major land interest within the Neighbourhood Plan area as owners of the Leegate Centre (including the Burnt Ash Road Garage site), which will be affected by those policies and allocations contained within the Lee Neighbourhood Plan.

The Leegate Centre Site is currently allocated within the LBL Site Allocations Local Plan (2013) for “*mixed use retail-led with housing, offices and hotel*”. The Site is also identified in the Regulation 18 Main Issues and Preferred Approaches Lewisham Local Plan Review (2021) for comprehensive mixed-use redevelopment comprising “*compatible main town centre, commercial, community and residential uses*”. It should be noted that the allocation does not refer to ‘retail-led’ development.

At the time of writing these representations, the Site has been the subject of on-going planning discussions and the principles of regeneration and housing delivery have been supported by the LBL and the Greater London Authority (hereinafter ‘GLA’).

Most notably, in 2016 LBL resolved to grant full planning permission on the Site, subject to the completion of a Section 106 Agreement for a, mixed-used development (including 229no. residential units and 36no. (16%) affordable housing units) (ref. DC/14/090032). The resolution to grant established the principle of the Site’s redevelopment for a mixed-use scheme.

Subsequently, a revised application for an amended mixed-use proposal, which increased the quantum of residential to 393no. units, of which 64no. (16%) were affordable, was submitted to the LPA for consideration in June 2018 (ref. DC/18/107468). This application was the subject of pre-application and post submission consultation with LBL and the GLA, but currently remains undetermined. For the avoidance of doubt, these two previous applications were not made by GHL and predate its ownership. There are no plans for such previous applications to be fully determined and granted.

Since acquiring the Site, GHL has reviewed these previous proposals to identify the underlying agreed principles from those previous proposals and carried out a fresh Site appraisal to identify opportunities to optimise the Site’s potential for a mixed-use scheme that can support an increased affordable housing offer (35%) alongside other wider benefits. GHL has engaged extensively with LBL and other stakeholders regarding the proposed application for the Site’s comprehensive redevelopment and is due to submit a full planning application to the LBL imminently. It is in this context that GHL submits this representation. GHL wishes to ensure that the Lee Neighbourhood Plan and the associated proposed Site Allocation, which will impact future redevelopment of the Site, is robust, flexible, and capable of responding to future economic and demographic change.

## Planning Context

Paragraph 29 of the National Planning Policy Framework (‘NPPF’) explains that neighbourhood planning gives communities the power to develop a shared vision for the area. NPPF paragraph 29 requires that Neighbourhood Plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.

NPPF footnote 18 explains that Neighbourhood Plans must be in general conformity with the strategic policies contained in any development plan that covers their area.

The National Planning Practice Guidance (‘NPPG’) explains that a Neighbourhood Plan must meet a set of basic conditions before it can proceed to a referendum and be made (paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004). The basic conditions are:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- b) Neighbourhood Plan contributes to the achievement of sustainable development.
- c) 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).
- d) The Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations.

The NPPG notes that while a Neighbourhood Plan is not tested against the policies in an emerging development plan the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the ‘basic conditions’, against which a Neighbourhood Plan is tested. Furthermore, the NPPG advises that where local and neighbourhood plans have conflicting policies, the later adopted plan will carry more weight.

## Comments on Draft Neighbourhood Plan

This section considers those policies and allocations within the draft Neighbourhood Plan, as put forward in the Regulation 16 Consultation. Overall, we support the preparation of the Neighbourhood Plan and its vision and objectives. However, we have various comments (including points of clarification and suggested recommendations) that we consider would help the Neighbourhood Plan be capable of meeting the basic conditions set out in national policy and that policies are complementary to those proposed by LBL in the emerging Local Plan.

Where relevant, we also set out below how the redevelopment proposals for the Site, which are due to be formally submitted as part of a full planning application imminently, respond to the draft Neighbourhood Plan policies.

### Site Allocations

#### SA10: Leegate Shopping Centre

##### Development Capacity

As mentioned above, GHL are the owners of the Site allocated within the draft Neighbourhood Plan under Draft Policy SA10.

GHL strongly supports the continued allocation of the Site for comprehensive mixed-use redevelopment of the existing shopping centre, comprising compatible main town centre, commercial, community and residential uses. Indeed, the redevelopment of the previously developed site will perform a key role in regenerating this district centre whilst also meeting housing needs within the borough and ease pressure on unallocated sites. GHL supports the mixed-use allocation within the draft Neighbourhood Plan, where *“development of various heights has yielded an indicative number of 450 flats”*.

The NPPF paragraph 119 promotes the effective and efficient use of land in meeting the need for new homes and other strategic uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions and contributing to affordable housing delivery. NPPF paragraph 120 identifies that decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and that decisions should promote and support the development of underutilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

Given the Site's District Centre location, this Site should be considered for high density residential development, optimising the number of homes delivered in the urban area, in the most sustainable location. The Site, together with other site allocations in the area, can play a key role in achieving ambitious housing growth during the remainder of the Lewisham Core Strategy Plan period (2011 – 2026), and the plan period for the emerging Lewisham Local Plan (2020-2024).

Therefore, it is considered that the proposed indicative development capacity and aspirations on unit numbers in the Neighbourhood Plan, could potentially significantly underestimate the role that the Site could perform in meeting a variety of needs. Encouragement of high-density development delivered through a high-quality design should be prioritised, rather than focusing on a quantitative unit capacity. The quantum of uses should be defined through a design-led process, in collaboration with the LPA, GLA, the Forum and other key stakeholders and should ultimately seek to effectively reuse and optimise previously developed land, and assist with the continued improvement, enhanced sustainability and long-term viability of the Lee Green District Centre. The precise number of units, mix and should therefore be determined as part of a design-led exercise. It is relevant to note that through numerous discussions and workshops (with the LPA and various stakeholders and consultants), an optimal capacity of 563no. units has been calculated. Optimising the use of the Site would be consistent with London Plan Policy D3 (Optimising site capacity through the design-led approach) that requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations.

Furthermore, we note that the draft indicative capacity of 450no. units has not been viability tested. Development of the Site should be encouraged to optimise both private and affordable housing provision. In order to be viable, a development of 450no. units would likely provide only a small amount of affordable housing.

##### Commercial Uses

GHL welcome and support the principle of flexible and adaptable ground floor commercial units that can respond to future changing town centre needs. The redevelopment proposals for the Site will incorporate a number of flexible units comprising a mix of town centre uses, which can adapt to the needs of future tenants as appropriate and create active frontages in and around the Site.

Draft Policy SA10 part iv. makes reference to the Portas Review (2011). Whilst the principles of the Portas Review are noted, we consider that reference to this document should be removed given the significant changes in circumstances, regarding how people work and shop, that have taken place since its publication (for example the Covid-19 Pandemic).

### Design and Heritage

There are two existing conservation areas in proximity to the Site (the Lee Manor Conservation Area boundary is approximately 70m to the south of the Site at its nearest point and the Blackheath Park Conservation Area is approximately 200m to the north of the Site at its nearest point). Although the Site does not immediately border the conservation areas, GH L support the conservation and enhancement of these conservation areas and have actively incorporated heritage considerations into the design of the redevelopment proposals. The design of the proposed development has been influenced by the presence of non-designated heritage assets in Lee Road to the north, and elsewhere close to the Tiger's Head junction, including in terms of materiality, proportion, depth of elevation, and detail.

Furthermore, part vii. of SA10 references the proposed Lee Green Town Centre Conservation Area. The assessments of the impact of the proposed development have been undertaken in accordance with its current status as an area of urban townscape which includes a number of non-designated heritage assets in both LBL and RBG. In our view, Tiger's Head Junction (i.e. the location of the proposed conservation area) should not be assessed as a designated heritage asset (i.e. a conservation area), until its character and appearance have been fully considered by the LPA and has been shown to meet the requirements of Section 69(1) of the Planning (Listed Buildings and Conservation Areas) Act, 1990, as has subsequently been designated.

Notwithstanding, GH L's application team has afforded due consideration to the existing heritage assets, character and architecture of the local area (including those buildings within the proposed Lee Conservation Area), within the design development of the redevelopment proposals.

### Public Realm

GH L welcome the principle of permeability, connectivity and urban greening across the Site. These principles have been incorporated into the public realm design for the redevelopment proposals. The proposals introduce new east-west and north-south connections across the Site. Furthermore, the public realm strategy increases the Site's urban greening, with aspirations for a policy compliant Urban Greening Factor and a Biodiversity Net Gain score which exceeds policy requirements.

Draft Policy SA10 part v. states that "*the three mature TPO London Plane trees at the north east corner of the site should be retained within any proposals for the site*". Whilst unfortunate, to facilitate the redevelopment proposals the three TPO trees in the north-east corner of the Site are proposed for removal. The principle of the tree removal was also established by the previous resolution to grant application on the Site and the principle of their loss has been discussed in detail with Planning, Design and Conservation Officers at LBL during the pre-application process. The proposals will include a significant amount of tree planting over and above the existing provision.

As drafted, part v. conflicts with the wording of draft Policy GB4 (Protection and Increase of Tree Cover) which states that the removal of TPO trees or mature trees is not supported, however where the removal of existing trees cannot be avoided, the proposal should comply with several criteria. As such, we recommend that the wording of GB4 is incorporated within SA10; to allow for the removal of trees in the instance where their removal cannot be avoided, subject to meeting the requirements of GB4.

### **SA09: Disused Lockup Garaged off Burnt Ash Road**

As mentioned above, GH L are the owners of the disused lockup garages off Burnt Ash Road, allocated within the draft Neighbourhood Plan under Draft Policy SA09.

Draft Policy SA09 allocates the garage site for residential development. The garage site is not included within the emerging proposals for the wider Leegate Centre site (the subject of draft Policy SA10) but is intended to come forward under a separate full planning application submitted by GH L at a later date.

The garage site's allocation in the draft Neighbourhood Plan is supported in principle. Notwithstanding, it is considered that reference to 'design code' be removed as no such design code currently exists or is intended to be prepared by GH L or the LPA for this small site. Any full planning application would be assessed on its own merits against the Development Plan and relevant design policies.

## Green and Blue Spaces

GHL support the principles set out in draft Policies GB1 (Protection and Enhancement of Green Spaces), GB2 (Achieving a Green Infrastructure-led Development Approach) and GB5 (Managing Flood Risk). The redevelopment proposals for the Site will seek to deliver on the objectives and requirements of these policies in the following ways:

- The planning application will be supported by a detailed landscape scheme. The proposals include areas of green roofs, soft and hard landscaping, a new public square, new trees and other planting. The landscaping proposals including the species of plants and trees have been carefully considered to ensure that they respond to the local environment and site characteristics.
- The proposals face onto identified areas of green space (estate ground) to the east on the adjacent site of Leyland Road. Leyland Road will be activated by ground floor entrances for duplex residential apartments alongside residential cores. As such, the proposed development will provide active frontages onto an area of designated green space, thus providing natural surveillance.
- The public realm strategy increases the Site's urban greening, with aspirations for a policy compliant Urban Greening Factor and a Biodiversity Net Gain score which significantly exceeds policy requirements.
- The landscaping proposals along Carston Close will create a much-improved environment which favours pedestrian and cycle movements.
- The proposed development will incorporate Sustainable Urban Drainage Systems ('SuDS') and will be supported by a Flood Risk Assessment ('FRA'). The FRA will demonstrate that it will not increase flood risk and will be required to contribute to surface water flood risk mitigation in the area.
- A Landscape Management and Maintenance Plan for the redevelopment would be secured by an appropriately worded planning condition.

As mentioned above, draft Policy GB4 (Protection and Increase of Tree Cover) states that the removal of TPO trees or mature trees is not supported, however where the removal of existing trees cannot be avoided, the proposal should comply with several criteria. As such, the wording of GB4 should be incorporated within SA10 (i.e. to allow for the removal of trees in the instance where their removal cannot be avoided).

## Transport and Connectivity

GHL supports the strategic aims and objectives of the Neighbourhood Plan insofar as they relate to transport and connectivity (Chapter 4), in particular the creation of opportunities to experience safe walking and cycling within the Forum area, a reduction in motor vehicle journeys on local roads and improved road safety for all users through better design.

The proposed redevelopment of the Site will adhere to the requirements of draft Policy TC1 (Protect, promote and enhance public transport), Policy TC2 (Improve measures to reduce pollution levels) and Policy TC3 (Improve and encourage active travel options and road safety measures in the forum area) in the following ways:

- The planning application will be supported by a Transport Assessment which will consider the impact of the proposed development on the capacity of existing travel options.
- The proposals include a limited amount of car parking provision which will deter future residents from private car ownership and will actively encourage future residents to use sustainable transport. All car parking, with the exception of two car club bays, will be provided off street and inclusive of active (20%) or passive (80%) Electric Vehicle Charging provision in line with London Plan requirements.
- The scheme includes a London Plan compliant provision of cycle parking including long stay cycle parking for future occupants of the Site in secure cycle stores along with short stay cycle parking provided in easily accessible locations in and around the Site in the public realm.
- The application will be supported by a Framework Travel Plan and a Draft Residential Travel Plan which will encourage active travel and set out the measures in which this will be delivered.
- The landscaping scheme has been designed to prioritise pedestrians including appropriate pavement widths. The proposals will introduce new walking and cycling routes through the Site including a north-south link from Eltham Road to Carston Close and an east-west link through the Site from Burnt Ash Road through a new public square. Carston Close will be relandscaped for use by pedestrians and cyclists and creating another new east-west link.
- Following a detailed air quality assessment, the proposals have been confirmed to be 'air quality neutral'. Details of the assessment will be provided within the forthcoming planning application submission.
- Policy TC3 requests that proposals consider the provision of more pedestrian and cyclist safety improvements to junctions and road crossings including the key routes of Burnt Ash Road/Hill and Eltham Road. The proposals include the relocation of the existing pedestrian crossing along Burnt Ash Road to align with the new public square and facilitate east-west movements through the Site and beyond and improve road safety.

## Building Homes and Amenities

### Community Buildings and Assets

Draft Policy BHA1 (Protection, Enhancement and Provision of Community Buildings) identified key community buildings and assets in the forum area including pubs, places of worship, community centres and hubs, libraries and sports clubs.

The Site includes the existing Lee Green Community Centre identified as '3', on Figure 9 and within Table 3. Since acquiring the Site, GHIL have engaged with representatives from the Lee Green Community Centre regarding the re-provision of a new community centre within the proposed development. The new community centre will be delivered on the ground floor of the development and will be of a size and in a location that has been agreed with Community Centre representatives. Should planning permission be granted, the S106 Agreement would include provisions in relation to the units' future fit out and commercial terms.

Figure 9 also identifies a further community centre on the site - '1'; this is listed in Table 3 as Lee Centre Aislbie Road. Figure 9 shows this community centre to be located on the Site in error and should be corrected in any subsequent version of the Neighbourhood Plan.

Draft Policy BHA1 Part A states that development which would result in the change of use/loss of a community building or asset, whether land or premises, currently or last used as a community facility will not be supported unless it can be fully demonstrated that a number of policy criteria are met. As drafted, the BHA1 Part A would apply to **all** community buildings or assets in existing or previous community use within the Forum area, and not only those key community buildings identified in Figure 9 and Table 3. GHIL consider that the wording of BHA1 Part A as drafted does not accord with adopted and emerging policy.

The new 'Class E' planning use class introduced in September 2020, permits the change of use to a range of commercial uses including retail, business and services, and community uses (such as medical or health services, indoor sport, recreation or fitness, creches, day nurseries or day centres) without planning permission. These changes were introduced to enable flexibility required for businesses to respond to the COVID-19 pandemic (and therefore support the premise that the *Portas Review* is outdated).

As drafted, the ability to apply the policy tests in Policy BHA1 to *all* community uses would not be practically possible due to the mechanisms afforded by the new use Class E which allow any use within Class E to change to another of the same class. We recommend that the wording of Policy BHA1 Part A is amended to explicitly refer to those identified 'key' community buildings and assets in the Forum area (which have use classes outside of class E) *only*, and not *all* community uses within the Forum area.

Draft Local Plan Policy CI1 (Safeguarding and Securing Community Infrastructure) supports the provision of community infrastructure in new developments. However, the Draft Local Plan recognises that new models of community infrastructure provision (such as multi-use and shared use facilities, or co-location of uses) can enable the consolidation or reconfiguration of services, which in turn can provide opportunities to make better use of land and assets. As such, draft policy allows flexibility to be applied to community floorspace provision, where it can be shown that a reduction would not compromise the delivery of services or provision of facilities. We recommend that Policy BHA1 part A is revised to ensure it reflects the aspirations of the emerging Local Plan, which acknowledges the value of flexible uses to ensure that places remain vibrant and viable.

Draft Policy BHA1 Part C requires major developments to support the development of new or improved community facilities where there are identified local needs and makes specific reference to the Leegate Centre. The redevelopment proposals include a range of new community and leisure uses including community centre, a medical facility, a gym and a public house, in accordance with the aspirations of Part C.

### Social Infrastructure & Public Realm

Draft Policy BHA2 (Protection, Enhancement and Provision of Social Infrastructure) asks that major developments consider including provision for suitably planned, well designed, accessible and integrated social infrastructure. The proposed redevelopment of the Site will adhere to the requirements of the draft policy through the provision of a new medical facility. Following consultation, interest in this space has been expressly raised by an existing local surgery and the National Health Service ('NHS').

With respect of the requirements set out in Draft Policy BHA3 (Enhancement of Public Realm Facilities), the redevelopment proposals incorporate a public drinking fountain within the new public square and the provision of publicly accessible toilets are being actively considered.

### Housing Delivery

GHIL supports the strategic aims and objectives of the Neighbourhood Plan insofar as they relate to housing delivery. The proposed redevelopment of the Site will adhere to the requirements of draft Policy BHA4 (Housing Delivery) in the following ways:

- The redevelopment proposals will for the Site provide a range of housing tenures. It will provide a London Plan policy compliant provision of affordable housing (35% by habitable room) including a Local Plan compliant split of tenure (70% social rent and 30% intermediate).
- The scheme will deliver 53% (by habitable room) 3+ bed units of affordable tenure which exceeds the Core Strategy target of 42%.
- The redevelopment will incorporate children's play provision for various age ranges and will therefore be 'child friendly'.
- The proposed redevelopment of the Site includes the provision of a new medical facility which has been subject to consultation with local surgeries and the NHS.
- The public realm strategy increases the Site's urban greening, with aspirations for a policy compliant Urban Greening Factor and a Biodiversity Net Gain score which significantly exceeds policy requirements.
- The proposals have been subject to design scrutiny through the Lewisham Design Review Panel process and through extensive pre-application discussions with Planning, Heritage and Design Officers at the LBL, the GLA and Historic England.

### Design of New Development

GHIL support the principles of high quality, environmentally conscious design. The proposed redevelopment of the Site will adhere to the requirements of draft Policy BHA6 (Design of New Development) in the following ways, which will be discussed in detail in the imminent planning application:

- The planning application will be supported by a Health Impact Assessment Matrix.
- The scheme performs extremely well in terms of energy efficiency. The scheme will maximise carbon reductions on-site using individual exhaust air heat pumps, which has allowed the provision of PV panels to be maximised.
- The scheme is achieving 90% site-wide carbon reductions. In addition, the updated energy strategy will meet the GLA energy hierarchy targets and exceed the 10% residential target for 'Be Lean'.
- The planning application will be supported by a Waste Management Strategy.

### Local Retail, Leisure and Economy

#### Retail Sites

The draft Neighbourhood Plan identifies the Site as a 'retail centre' (Figure 12). GHIL acknowledge the need for retention of a commercial element within the redevelopment proposals Site and support much of the principle established within draft Policy RLE1 (Maintain, improve and sustain the diversity, vitality and viability of retail sites).

The redevelopment proposals will include a mix of commercial uses which promote both the day-time and night-time economy. Provision of new and well-designed commercial spaces will provide a much improved and complimentary retail offer than the existing scenario and in accordance with the draft policy, will create an "*attractive, welcoming and inclusive environment*". The proposal has been designed to ensure permeability and create pedestrian friendly spaces. Additionally, GHIL have supported tenants in taking up space at the Site as 'meanwhile use' at reduced market rents to ensure continued vitality of the space. This approach directly accords with the aspirations of draft Policy RLE1 Part A, 2.

Notwithstanding the above, there are aspects of Policy RLE1 that GHIL should be re-examined.

RLE1 Part A, 1 states that "*proposals should retain support an increase in the range of retail, employment, socio-cultural and leisure uses*", and RLE Part B states that "*changes of use resulting in the loss of retail, socio-cultural, employment and leisure services will be resisted.*" In its current form, Draft Policy RLE1 Part A, 1 and Part B would seek to prohibit a reduction in retail, employment, socio-cultural and leisure uses.

London Plan Policy SD8 (Town Centre Network) Part E states that "*District Centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, social infrastructure, local employment and workspace, whilst addressing the challenges of new forms of retailing and securing opportunities to realise their potential for higher density mixed-use residential development and improvements to their environment.*" Furthermore, Annex 1 of the London Plan identifies Lee Green District Centre as having 'low commercial growth' potential. Such centres are encouraged to pursue a policy of consolidation by making the best use of existing capacity, either due to (a) physical, environmental or public transport accessibility constraints, or (b) low demand.

Policy RLE1 Part A, 1 and Part B conflict with the above-mentioned London Plan policies and would have clear implications on the ability for developments in the District Centre to deliver a viable quantum and mix of town centre uses that could stand the test of time. We therefore recommend that the wording of this policy is amended to reflect the directions set out in the London Plan, which allow for consolidation by making the best use of existing capacity.

Policy RLE1 Part A, 5 encourages new development to be phased in such a way as to allow businesses to continue trading throughout the redevelopment. Policy cannot stipulate commercially sensitive expectations in regard to site delivery and therefore we recommend that the wording of this policy should be amended / removed accordingly.

Whilst the principle of RLE1 Part A, 4 is supported (i.e. to promote a mix of local economies including retail, hospitality, leisure and entertainment), as stated above reference to the Portas Review should be removed given the significant changes in circumstances that have taken place since its publication (for example the Covid-19 Pandemic).

#### Lee Green District Centre (Lee Forum Priority Project)

GHL support the principles of Draft Policy RLE5 (Revitalise Lee Green District Town Centre); this being to promote the vitality of Lee Green District Town Centre with a mix of town centre uses through site intensification, which respects the heritage significance of the town centre. Indeed, the redevelopment proposals will accord with many of the draft policy aspirations as mentioned above including, but not limited to, promoting the day-time and night-time economy through the provision of a mix flexible town centre uses of an appropriate size, delivery of a high-quality public realm which favours pedestrian movement, introducing new through routes to improve connectivity in and around the Site, creation of active frontages and increased urban greening.

Notwithstanding the above, there are aspects of Draft Policy RLE5 that GHL believe should be reconsidered.

Draft Policy RLE5 Part B, 1. states that “*heights of new development along the main active frontages do not exceed the height of immediately surrounding buildings.*” In the instance of the Site specifically, this approach would result in building heights along Burnt Ash Road and Eltham Road of 2-3 storeys. This approach is not feasible, nor does it comply with adopted London Plan or emerging Local Plan policy which requires site density to be optimised through a design led approach. Furthermore, this approach would significantly hinder the ability of the Site to deliver the number of homes indicated in the draft Local Plan Site Allocation SA10. Finally, this approach fails to acknowledge that the existing Site already comprises ‘tall buildings’ of up to 8 storeys and is subject to a resolution to grant permission for buildings with a consistent height of 8 storeys, up to 10 storeys, which should be a material consideration.

Draft Policy RLE5 Part B, 2, further states “*Height to gradually increase from the cross-roads demonstrating minimal impact on light conditions, wind tunnelling and visual impact from the main town centre crossroads.*” The redevelopment proposals have been subject to significant pre-application design scrutiny from LBL Design Officers and Design Review Panel (‘DRP’). Notably, it has been acknowledged in these discussions that the crossroads (Tigers Head Junction) is the most appropriate location for additional height on the Site. Furthermore, the proposals have been tested in respect of potential environmental impacts identified (such as lighting and wind), with minimal to no effect, as outlined in reports that will support the forthcoming application. In addition, the height of the buildings to the south-east of the Site has been lowered in response to comments received from LBL and the DRP. This is at odds with the wording of RLE5 Part B, 2.

As such, we recommend that the prescriptive height restrictions set out in Draft Policy RLE5 be removed and the wording revised to align with the London Plan and emerging Local Plan approach of site optimisation through a design-led approach.

Draft Policy RLE5 Part B states that, “*a masterplan should be prepared to guide future development in the area demarcated as the Lee Green District Town Centre so that an integrated approach is adopted to the development of individual sites.*” Further detail is set out in section 6, ‘Lee Green District Town Centre Detailed Area Strategy / Master Planning’.

GHL question the need for the preparation of a masterplan for Lee Green District Centre (as set out in Part B). Site Allocations within this area are separate from one another and are divided by an already established road network. This road network will not change following development of the Site Allocations and thus the Sites cannot be considered adjoining. The planning process will ensure consistency of design and appearance across the Sites, without the need for a masterplan.

#### Retail Public Realm

GHL support the principle of improving the public realm of retail sites. The proposed development will support the principles of draft Policy RLE3 (Improve and Enhance the Public Realm of Retail/Cultural Activity Sites), through the implementation of the following:

- Designing the commercial element of the development to be accessible to all, for example, through the utilisation of appropriate levelling and the provision of lifts.

- Prioritising pedestrians by providing pedestrianised areas and routes, for example through the pedestrianisation of Carston Close and the relocation of the existing pedestrian crossing on Burnt Ash Road to align with the new public square.
- The proposed development will provide limited car parking and fully policy compliant cycle parking provision to encourage more sustainable modes of transport.
- A new public realm area, including a public square which incorporates green outdoor infrastructure.

#### Protection of Local Employment Sites

Draft Policy RLE4 encourages retention of existing businesses and, where possible, incorporation of secure units for local businesses. The comprehensive nature of the redevelopment proposals would not enable existing businesses to remain on the Site during the demolition and construction stages. As such, the imminent planning application will provide details of the relocation package and arrangements that will be offered to all existing tenants of the development, including the potential to return to the Site once the development has been completed.

#### Heritage and Design

GHL agree with the principles set out in Draft Policy HD1 (Designation, Conservation and Enhancement of Heritage Assets). The forthcoming planning application will be supported by a Heritage and Townscape Visual Impact Assessment ('HTVIA') and a Design and Access Statement, which will address heritage and design and detail how the scheme design has sought to respond to the local heritage context.

Draft Policy HD2 Part A requires all new development to *"Have regard to the form, function, structure and heritage of its context. The scale, massing and orientation of sustainable buildings, streets and spaces must be taken into account"*. The proposed development responds to the existing townscape context by introducing blocks of new built form which respond appropriately to existing buildings along Burnt Ash Road, Lee Green and Eltham Road, as well as the wider townscape, as is assessed in detail in the HTVIA that will accompany the forthcoming planning application.

Draft Policy HD2 Part A further require all new development to *"Incorporate colour, materials, architectural design and scale which are in harmony with the spatial context"*. The facades of the proposed new buildings deliberately interpret and respond to the qualities of existing built forms within the surrounding townscape to integrate them into the spatial context.

Draft Policy HD2 Part C states that *"Design should demonstrate a connection to human needs and requirements of all people. Designs for new development should demonstrate that human experiences and perspectives are central, including: ...Designing at human scale, prioritising pedestrian and wheelchair access."*

GHL notes that that Site Allocation SA10 part vii. refers specifically to development on the Site as needing to be of a human scale as per HDC Part 2; suggesting this would result in buildings heights of no greater than 11 storeys. As discussed later in this representation, we question the conclusions of the SEA comparing the environmental and social benefits of buildings of 11 vs 15 storeys, including how anything above 11 storeys would not constitute human scale and why the SEA is not supported with justification (such as townscape or visual assessments) as to how the conclusions have been made. In considering human scale, the constituent parts of a building, including its details, should be taken into account, as well as its overall envelope. Therefore, it is unclear how a 15 storey building could not represent a human scale if appropriately designed.

Further comments in relation to the height of development in the Lee Green District Centre is set out in further detail in the discussion on Draft Policy RLE5 above.

As explained above, GHL acknowledge the potential for the proposed Lee Green Town Centre Conservation Area, however until such a time as the proposed conservation area has been formally adopted following the required process and appropriate scrutiny, the area should be considered in its existing context; that being a group of non-designated heritage assets.

#### Area and Design Guidance

Area Specific Design Guidance: Area A3. Lee Green District Town Centre, identifies the Leegate Centre as being a site that offers potential for substantial redevelopment which is currently going through the planning process. As noted above, following a significant period of pre-application consultation, GHL are due to submit a full planning application for the redevelopment of the Site imminently.

The guidance recognises that the Site offers opportunities for improved quality of design and scale of the built form in relation to its context and streetscape, and enhancement of the public realm in order to reinstate permeability. GHL supports this statement and it is these core principles that have underpinned the design-led approach embraced by the design team for

the Site's proposed redevelopment. The proposals include substantial public realm and landscaping improvement works which seek to strengthen existing pedestrian connections and create new links through the Site. The design of the proposed development has been developed with appropriate research into, and understanding of, local character and identity. This has been at the fore throughout discussions with the LPA and other consultees, and has influenced the design in terms of materiality, proportion, depth of elevation, detail, etc.

## Strategic Environmental Assessment

The SEA, which accompanied the Regulation 16 draft Neighbourhood Plan, acknowledges the prominence of the Leegate Centre and it being key to the renewal and revitalisation of the town centre environment. The SEA explains, *"The Leegate Centre was not initially identified as an appropriate site allocation for consideration through the LNP, as it had existing planning permission during the completion of the site assessment process. This planning permission has elapsed, and the site has since been bought by Galliard Homes (the site promoter). In this respect, the regeneration of the Leegate Centre has been identified as a key priority for the local community, as informed by public consultation events and via responses to both the design guidance for the LNP and the extant planning permission for the site."*

The SEA considers two options through the SEA process for the Leegate Centre redevelopment, being Option A: Consideration of a higher building height of up to 15 storeys; and Option B: Consideration of a lower building height of up to 11 storeys. The appraisal of these options has been presented through seven SEA themes and the below section details our comments on each of the findings of these themes.

### 1. Air Quality

The assessment finds that the air quality effects would be comparable for both options and, in the absence of a full report, GHG would support the conclusions drawn on this theme. Notwithstanding, we note that the assessment makes an assumption that Option A is likely to increase the number of people accessing the Site (including potentially via private vehicles). However, the scheme is limited in the number of car parking spaces it can provide overall and, arguably, the provision of more units leaves less room for car parking spaces (owing to back of house requirements etc.).

On this basis, **Option A and Option B should both be the preferred option** in relation to the theme of air quality.

### 2. Biodiversity and Geodiversity

The assessment concludes that neither option will impact the integrity of designated sites for biodiversity and/or geodiversity within the LNP area and therefore we do not dispute this conclusion. It is noted that the effects on areas of biodiversity and/or geodiversity largely depends on the layout of the development and incorporation of enhancement measures. The forthcoming application will be supported by an Arboricultural Impact Assessment and a Preliminary Ecological Appraisal, which will provide further details on these matters.

On this basis, **Option A and Option B should both be the preferred option** in relation to the theme of biodiversity and geodiversity.

### 3. Climate Change

The assessment finds that **both options** have the potential to positively contribute to climate change mitigation efforts and acknowledges that Option A has the potential to help limit emissions on a per capita basis by delivering higher density development. The SEA notes that effects are also dependent on the extent to which the proposals integrate energy efficient measures through design. We agree with these conclusions.

On this basis, **Option A and Option B should both be the preferred option** in relation to the theme of climate change.

### 4. Landscape and Townscape

The landscape and townscape section of the SEA considers that Option A (buildings up to 15 storeys) has the potential to have a greater impact to the surrounding townscape character of Lee Green District Centre. It is considered that this includes impacting upon the setting of the streetscape, locally important viewpoints (including some long-distance views and from within the surrounding conservation areas). The assessment therefore concludes that Option B is the preferred option in this regard.

However, we note that the assessment does not indicate how 'impact' has been assessed, and therefore it is not clear how much weight can be given to the conclusion. On the understanding that only one Block comprises 15 storeys and the remainder are of equal or similar height, how can one Block be deemed to have such an impact?

Without a proper, robust assessment which considers all factors of impact, we consider it presumptuous to state that 15 storeys would have a greater 'impact'. The design of GHl's proposed development has been assessed on numerous occasions by LBL, GLA, Historic England and the DRP and significant consideration has been given to the impact of height on the surrounding area and long-distance views. The height of the proposed development has been considered in detail through the pre-application process and is tested in 19 views included in the HTVIA that will accompany the planning application. Furthermore, numerous designs have been assessed and we are confident that the location of the taller elements within the scheme are located in the most appropriate locations on the Site.

The landscape and townscape section further states that the three mature TPO trees should be retained and enhanced where possible through new development areas. The assessment acknowledges that the effects on trees would be comparable for either option. We agree with this conclusion.

On this basis, **Option A and Option B should both be the preferred option** in relation to the theme of landscape and townscape.

#### 5. Historic Environment

Similar to the above, the Historic Environment section of the SEA considers the Site's proximity to heritage assets and concludes that, in terms of impact, **Option B is preferred**. We do not disagree with the notion that both Options have the potential to impact the integrity of historic assets if designed inappropriately. We would reiterate that our proposed development has undergone rigorous design review in order to mitigate impacts on the surrounding environment.

We again question how 'impact' is assessed throughout the SEA. This section states that the additional building height proposed through Option A has the potential to increase visibility through the gaps in mature trees and Manor House Gardens Registered Park and Garden and along a greater number of locations (such as Burnt Ash Road and Leyland Road). We do not dispute that greater height results in greater visibility, however this does not necessarily constitute greater impact. We would be interested to understand the means through which impact has been assessed, as the SEA does state that building height alone is 'less likely' to detract from the overall character.

We agree with the conclusion of this section which states that the significance of the effects arising from each option would depend on the nature of development and the extent to which mitigation measures are incorporated into the design. However, in the absence of evidence of a robust assessment, we do not agree with the statement that Option A would have additional potential to lead to direct and indirect impacts on the significance of the historic environment locally.

For example, is it not possible for a poorly designed 11 storey building to have greater visual impact on townscape, than a high-quality 15 storey building?

We therefore consider that restricting height to 11 storeys without evidence to support the reasoning, is not consistent with London Plan Policy D3 (Optimising site capacity through the design-led approach) which requires all development to make the best use of land to optimise site capacity.

On this basis, **Option A and Option B should both be the preferred option** in relation to the theme of historic environment.

#### 6. Community Wellbeing

This section acknowledges the significant amount of new housing, employment space, leisure, community and cultural facilities that can be provided through the comprehensive redevelopment of the Site. It also recognises that Option A is likely to provide a greater proportion of dwellings of a range of types and tenures, meeting housing needs and having potential to deliver additional community and employment uses.

GHl support this conclusion and note that on the basis of the density of the proposed development (which incorporates building heights of up to 15 storeys) the proposed development is able to deliver 36% affordable housing (by habitable room) including 70% social rent tenure and 30% intermediate home ownership tenure. The proposed development is also able to deliver a range of dwelling sizes to meet housing needs including studios, 1, 2, 3 and 4 bed dwellings. The ability to offer a policy compliant affordable housing offer and dwelling mix is a direct result of the optimised residential density and the incorporation of tall buildings. Placing restrictions on building heights at 11 storeys would have implications on the ability to optimise site capacity through the design-led approach (as required by London Plan policy D3), and would subsequently impact on the schemes ability to provide this level of affordable housing and dwelling mix. Therefore, **Option A should be considered the 'preferred option'** in this regard.

The SEA recognises that the redevelopment of the Site will deliver development in a location which will support sustainable transport use and be in proximity to services and facilities, encouraging active lifestyles and accessibility to key amenities. However, the SEA also references social inclusion and states that evidence suggests residents living in taller buildings have the potential to feel more isolated and alienated. As such it considers "*Option A is perhaps less likely to support social inclusion in comparison to Option B.*" Both Option A (15 storeys) and Option B (11 storeys) would constitute a 'tall building'

in the planning policy context. With a marginal difference of 4 storeys, **we would strongly contest the conclusions drawn in respect to social inclusion.**

Similarly, we would also dispute the statement that Option B would, *“likely ensure that appropriate proposals were initiated to limit the impacts of taller buildings on the quality of residential environments, including relating to such buildings blocking out light.”* The difference in impact on daylight and sunlight impacts on the surrounding environment between an 11 and a 15 storey building would likely be limited (if any) and any conclusions assuming a greater impact by a 15 storey building would need be confirmed by testing. In the absence of any evidence or testing, weight cannot not be afforded to these conclusions.

On the basis of the above, **Option A should represent the preferred option** with regard to the theme of community wellbeing.

## 7. Transportation

The SEA suggests that Option A is likely to increase the number of people accessing the site (including potentially via private vehicles), which may exacerbate congestion issues in the vicinity of the site. We would contest this statement. As we state above, the scheme is limited in the number of car parking spaces it can provide, and thus, an increase in residential units does not create more space for parking. The impact on congestion as a result of a 15 storey building compared to a 11 storey building would therefore be negligible.

The SEA further which states that, *“such effects are likely to be limited by the highly accessible location of the site in terms of its proximity to key transport links, including bus services, and from Lee railway station, rail services, albeit dependent on the extent to which the development proposals incorporate appropriate avoidance and mitigation measures to help limit the impacts.”* The proposed development will incorporate various measures which will support and promote sustainable travel including 1,150no. cycle parking spaces, increased permeability via the creation of new access routes, Travel Plans, two car club parking bays and restrictions on future resident car parking permits. The delivery of such measures is not predicated on building heights, therefore this would be comparable for both options.

Reflecting the above, the SEA considers that the transportation effects would be comparable for both options. However, it acknowledges that Option A will deliver increased amounts of development in a highly accessible location by sustainable modes of transport, which is positive for the Transportation SEA Theme.

On the basis of the above conclusions, **Option A should represent the preferred option** with regard to the theme of transportation.

## **SEA Assessment Conclusions**

The SEA assessment concludes that the Forum’s preferred approach for the Leegate Centre is Option B. As discussed throughout this section, we dispute this conclusion for a number of reasons. No modelling, testing, or visual assessments have taken place in order to form the justification for the SEA themes. Furthermore, a number of the arguments made, such as an increase in private vehicles through provision of additional storeys, do not hold true. As per our above assessment, we consider the greatest benefits appear to point towards Option A – 15 storeys; which should therefore be considered as the preferred option.

## **Conclusion**

As set out in this representation, GHl support the preparation of the Neighbourhood Plan and the vision and objectives set out within. However, it is considered that the comments and recommendations raised would help the Neighbourhood Plan be capable of meeting the basic conditions set out in national policy and that policies are complementary to those proposed by LBL in the emerging Local Plan. We would respectfully request that these comments are given due consideration as part of the examination process.

Should you have any queries or require further information at this stage, please contact Stuart Baillie ([Stuart.Baillie@knightfrank.com](mailto:Stuart.Baillie@knightfrank.com)) or Emma Gill ([Emma.Gill@knightfrank.com](mailto:Emma.Gill@knightfrank.com)).

Yours faithfully,

Knight Frank LLP