

## Lee Neighbourhood Plan Submission Consultation

### 1 General Comments on Submitted Plan

- 1.1 The Neighbourhood Plan is very long, taking the focus away from the policies. It has been made even lengthier between the Regulation 14 consultation and this version, which does not improve the readability or useability of the plan. As recommended in our response to the Regulation 14 consultation, the Lee Forum Area Profile section has been moved to an appendix. Section 2 'Area Appraisal' could also be moved to an appendix, or both sections could be removed completely and published separately as part of the evidence base.
- 1.2 Although the London Plan was undergoing review while the Lee Plan was in preparation, the new London Plan has now been adopted and references throughout the Neighbourhood Plan to policies in the previous London Plan should be deleted and replaced with up-to-date policy references.
- 1.3 Neighbourhood plan policies should be supported by sufficiently robust evidence to withstand scrutiny at examination and/or challenge from developers during the development management process. Section 1.8 refers to Key Supporting Evidence which has informed the development of Policies in the Plan. Annex 4 lists the Key Evidence Reports and it is positive to note that there are a number of locally prepared documents; however some of the links to these documents are not working.
- 1.4 For each Policy area, the plan sets out the Policy Intent, Strategic Aim, Objectives, Identification and Mapping, Policies, Recommended Further Actions and Justification and Evidence including existing higher level polices. It is considered that this is a logical approach and the Policies are easily identifiable and clearly presented. The justification text is a new addition to the Plan and is supported.
- 1.5 Some of the detail on the Maps is hard to read at this scale.
- 1.6 The twelve Site Allocations, detailed within the 'Building Homes and Amenities' section of the Plan are all within LB Lewisham. The four proposed Site Allocations within RB Greenwich have been removed, this is welcomed.

## Lee Neighbourhood Plan Submission Consultation

1.7 The general thrust of the Policies is supported, and while some of our concerns from the Regulation 14 consultation have been addressed, there are still some areas of concern which are detailed in the table below. Those which relate to the basic considerations are most significant, the remainder are suggested changes which would improve the plan in terms of its readability and useability for both officers and developers.

## 2 Specific Policy Comments on Plan

REF	POLICY TITLE (if applicable)	RBG COMMENTS	Relevant to Basic Conditions
Section 1.4		A reference to re-designation of the Forum in 2021 should be added.	

Lee Neighbourhood Plan Submission Consultation

Section 1.6		Delete reference to 2011 and 2017 London Plans.	
Section 2.2		Under 'opportunities' reference is made to Lifetime Homes standards. Following the Government's 2015 'housing standards review' Lifetime Homes standards were replaced by the optional building regulations standard M4(2) entitled 'accessible and adaptable dwellings'.	
3.3		<p>Many policies have a size threshold of developments to which they apply: “10 or more residential units or 150sqm of retail or employment space”. The reasoning given for the 150 sqm threshold is arbitrary and does not appear to have been subject to any viability testing. Whilst the threshold could be appropriate in some circumstances where supported by appropriate evidence, it should not be used arbitrarily for the range of policies it has currently been applied to in the plan.</p> <p>The appropriate threshold should be considered for each policy, but as a starting it would be preferable to refer to ‘major development’. (<i>Major developments are those which involve the creation of 10 or more residential units; residential development on a site of 0.5 hectares or more; development on a site of at least 1 hectare; or the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more</i>).</p> <p>This would ensure consistency and conformity with RBG policies and local validation list requirements. This would also capture schemes for other proposals, such as education.</p> <p><b>With the threshold as drafted, many of the polices do not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies).</b></p>	Yes

## Lee Neighbourhood Plan Submission Consultation

GREEN AND BLUE SPACES			
4.1.1	Policy Intent	While improving access to playing fields is a laudable aim, the planning system cannot require this on sites in private ownership. Creation of Nature Conservation Areas is supported, however, their designation as 'Sites of Importance for Nature Conservation' would need to be established according to strict criteria at a Regional Level.	
Table 2	Green Space Designation	9 – Designation as Site of Importance for Nature Conservation cannot be achieved through this Neighbourhood Plan. Sites 12–16 & 23 are already Metropolitan Open Land, therefore having the highest level of protection from development. If land is currently or previously used as a playing pitch, regardless of ownership, Sport England would be a statutory consultee on any planning application affecting it.	
Figure 5	Green Spaces in Lee Forum Area	Land should be shown by its planning designation, such as MOL or Community Open Space, rather than 'Sports Grounds'	
GB1	Protection and Enhancement of Green Spaces	<p>All Green spaces, regardless of designation (MOL, Community Open Space, Allotments etc) are treated in the same way by this Policy. There needs to be a distinction between the differing levels of protection.</p> <p>A – would allow development on MOL if there are public benefits. This would be contrary to RBG Policy OS2.</p> <p>C Policies for development do not fit well in a policy to protect open space! The RBG local validation list requirement to submit a landscaping strategy should be referenced here instead.</p> <p><b>As drafted, Policy GB1 does not meet the Basic Conditions (general conformity with the strategic policies).</b></p>	Yes

## Lee Neighbourhood Plan Submission Consultation

GB2	Achieving a Green Infrastructure-led Development Approach	<p>As in 3.3 above, the threshold of 150sqm is arbitrary and inappropriate.</p> <p>The policy should be reworded to state “The scale of green infrastructure provision should be proportionate to the size of the scheme and <i>seek to address the following criteria...</i>”</p> <p><b>As drafted, Policy GB2 does not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies).</b></p>	
GB3	Designation of Nature Improvement Areas	<p>A – “Two Nature Improvement Areas are to be designated, in consultation with the local community” is not clear. Are the Nature Improvement Areas intended to be designated through this plan or through a subsequent consultation process?</p> <p>“the vicinity of the area” requires quantifying</p> <p>B – This is confusing, the policy states “will be designated” and “proposed trail”. Is this Policy designating the trail or flagging up a future project / community objective / aim of the Forum? Reference to SE London Green Chain Walk should be deleted as this is not within the control of the Forum or Councils.</p> <p>Criterion 2 – Reference to the Local Open Space Deficiency Area should be deleted. Improved access to the River Quaggy may not address this deficiency.</p> <p>Criterion 6 – “close to” needs to be quantified. “preserve / enhance” is terminology usually associated with the built environment.</p> <p><b>As drafted, Policy GB3 does not meet the Basic Conditions (having regard to national policies / general conformity with the strategic policies).</b></p>	Yes

## Lee Neighbourhood Plan Submission Consultation

GB4	Protection and Increase of Tree Cover	<p>A This is outside of the scope of a neighbourhood plan; a Neighbourhood Plan cannot include a Policy to set out what a Council should include in its validation criteria.</p> <p>In any case, it should be noted that the RBG Local Validations list requires a tree survey / arboriculture report to be submitted with any application where there are trees within the application site or on land adjacent that would be affected by the development (including street trees). The Council’s tree officer would be consulted on relevant applications by the case officer, and may be involved in pre-application discussions, but it is not appropriate for applicants to be required to consult tree officers prior to submission of an application in order for an application to be considered to be valid. The Lee Forum can respond to the consultation on a planning application but a developer would not be required to consult them in advance of submission of a planning application, although the council encourages early engagement by developers with communities at an early stage in the process.</p> <p>B ‘Mature trees’ is open to interpretation, however, trees would not be afforded protection purely due to their age. RBG Policy OSF iii acknowledges the importance of tree retention, however this will not be feasible in every situation. Trees with TPO’s are provided greater protection and the council would resist removal.</p> <p>B4 is not a planning issue and cannot be required.</p>	Yes
GB5	Flood Risk	<p>B – It is unreasonable to expect demonstration that SuDS can be accommodated on all outline applications. The expectation of what SuDS should achieve in this policy is too specific. The Council’s Local Validation list requires details of SuDs on all major applications; and on developments on land over 0.25ha in area and in areas identified in the Royal Borough’s Surface</p>	Yes

## Lee Neighbourhood Plan Submission Consultation

		<p>Water Management Plan. The London <a href="#">Sustainable Drainage Proforma</a> sets a clear standard for the information that should be provided in a Sustainable Drainage Strategy.</p> <p><b>As drafted, Policy GB5 does not meet the Basic Conditions (general conformity with the strategic policies).</b></p>	
GB6	Protection and Enhancement of Lee's playing fields	<p>The Sport England Playing Fields Policy and Guidance sets out exceptions where they will not oppose development on playing fields, or land previously used as playing fields. RBG Core Strategy Policy OS (d) also sets out exceptions. This Policy should also set out the exceptions, in order to align. However, there is a question as to whether this policy is needed if it is duplicating Local Plan Policy.</p> <p><b>As drafted, Policy GB6 does not meet the Basic Conditions (general conformity with the strategic policies).</b></p>	Yes
Figure 7	Nature Improvement Areas	<p>'Lee Green Playing Fields' is not a recognised designation and should not be shown in this way. All of the areas shaded are not Playing Fields. The Map should reflect the Local Plan designations of MOL, Community Open Space etc.</p>	
4.1.6		<p>Bullet 4 - Is this a commitment from Lee Forum to carry out audits of trees? This should be clarified. It should not be an expectation on the Local Authorities.</p>	
<b>TRANSPORT AND CONNECTIVITY</b>			
TC1	Protect, Promote and Enhance Public Transport Provision	<p>A - Improvements to bus / train services are not within the control of a Local Authority. CIL contributions could be used towards new or enhanced public transport if appropriate.</p> <p>B - The threshold of the size of development to which this Policy applies should be clarified. It is important to consider when these requirements are reasonable and proportionate. The RBG Local validation list requires transport assessments on residential applications of more than 50</p>	Yes

Lee Neighbourhood Plan Submission Consultation

		<p>units, major commercial applications (&gt;1000sqm) and major applications for commercial development (including retail); and all applications for schools and nurseries, hospitals, places of worship and others where the proposed development would have significant transport implications. Transport Statements are required for residential schemes of 10–50 units and all applications where traffic and travel implications will be increased.</p> <p><b>Policy TC1 does not meet the Basic Conditions ((having regard to national policies / achievement of sustainable development ).</b></p>	
TC2	<p>Improve Measures to Reduce Pollution Levels</p>	<p>The threshold of the size of development to which this Policy applies should be clarified. It is important to consider when these requirements are reasonable and proportionate. Policy could make reference to the validation requirement to provide an air quality assessment.</p> <p>3 Provision of off–street parking does not discourage private vehicle use. Parking provision should be considered in line with the London Plan’s maximum parking standards depending on the PTAL score of the site. It may not be appropriate for any off–street parking to be provided. Furthermore, there is little justification for requiring basement parking on all major schemes. This should be considered from a design perspective on individual developments rather than covered by a blanket statement. The purpose of the statement ‘ Developers will make best efforts to ensure delivery of suitable public transport solutions to population increases’ should be deleted. This is a strategic issue, not to be addressed on a site –by site basis through Neighbourhood Plan Policy.</p> <p>There is an overlap between the requirements of this Policy and improvements to the area that could be sought through S106/CIL.</p>	Yes



**Lee Neighbourhood Plan Submission Consultation**

		<b>Policy TC2 does not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies).</b>	
TC3	Improve and Encourage Active Travel Options and Road Safety Measures in the Forum Area.	<p>Proposals impacting on capacity or provision of road infrastructure could be just one residential unit. The effect of this policy would then mean that any new house being built in the plan area would have to address all of the considerations that would be considered unreasonable. The developments to which this Policy applies should be defined; requirements on development has to be proportionate to the scale of development. Reference to a need for a Transport Impact Assessment should be added.</p> <p>The ‘positive contribution to the Mayor’s Healthy Streets Approach’ is not something that can easily be assessed.</p> <p>Provision of parking spaces for different types of development will be subject to the London Plan maximum parking standards. It may therefore not always be appropriate to provide parking for shops, depending on the site’s location and size.</p> <p>Depending on the size of individual proposals, many of the clauses here may not be applicable to the grant of planning permission and are more appropriately addressed under the council’s capacity as highway authority. It should be made clear that these may only apply where the comprehensive redevelopment of a large site is being proposed.</p> <p>There is an overlap between the requirements of this Policy and improvements to the area that could be sought through S106/CIL. For example, clause 9 would be unlikely to be secured via planning condition or S106 planning obligation where it does not directly relate to the individual development concerned.</p> <p>The provision of electric charging points would not reduce the reliance on motor vehicles and should be separated from this clause (9 ii).</p>	Yes

Lee Neighbourhood Plan Submission Consultation

		<p>1 Delete reference to ‘French style crossings’. These are not currently permitted on UK roads.</p> <p><b>Policy TC3 does not meet the Basic Conditions (having regard to national policies / achievement of sustainable development ).</b></p>	
<b>BUILDING HOMES AND AMENITIES</b>			
Figure 10	Recreational Facilities in the Lee Area	Areas shaded green and labelled ‘playing fields’ should be labelled ‘protected open space’	
BHA1	Protection, Enhancement and Provision of Community Buildings	<p>A – 1. Requiring a space to be both under-utilised <i>and</i> no longer serving the community is considered excessive. Under-utilisation could be a consideration in determining whether the use continues to serve the community. The phrase ‘efforts have been made’ is open to interpretation. A time period needs to be defined. 3. Is unclear, any development where a community building is lost would lead to a net loss of overall community space. A reworded criterion 1 together with criterion 2 should suffice</p> <p>C- Is there an evidence base which identifies local needs? Such improvements to the area would normally be sought through S106/CIL contributions where applicable. It is not considered necessary to have further policy to ensure such contributions are made. The threshold requires reconsideration and should be aligned to existing Local Plan policy if retained. Delete reference to Leegate Centre as this is confusing.</p> <p>D Clarify ‘ local retail and economy hubs’ which are not currently defined. It would be better to refer to designated local centres here. If community buildings or facilities are those limited to the types of facility listed in the table above the policy, provision would be generally appropriate in local centres (with the possible exception of sports clubs); however, if other types of facility (e.g. nurseries, doctors surgeries) are encompassed by this policy, other more residential locations may be appropriate. There is a lack of clarity over whether the policy is supposed to incorporate other types of facility and if so, what criteria could be considered for alternative locations outside of designated centres.</p>	Yes

## Lee Neighbourhood Plan Submission Consultation

		<b>Policy BHA1 does not meet the Basic Conditions (having regard to national policies /general conformity with strategic policies / achievement of sustainable development ).</b>	
BHA2	Protection, Enhancement and Provision of Social Infrastructure	<p>An assessment of the existing and future infrastructure requirements to support population growth is prepared by the Local Authority in collaboration with infrastructure providers and published in an Infrastructure Delivery Plan (IDP). The council’s latest IDP was published in 2021 and is available on the council’s website. Any identified infrastructure is then secured through S106, CIL or other wider funding sources. Social infrastructure should be strategically planned, not required on development sites on an adhoc basis.</p> <p><b>Policy BHA2 does not meet the Basic Conditions (having regard to national policies /general conformity with strategic policies / achievement of sustainable development ).</b></p>	Yes
BHA3	Enhancement of Public Realm Facilities	<p>The projects in this policy could be delivered through CIL or other funding sources.</p> <p>C – the provision of litter bins is likely to be permitted development if considered development at all and this clause should be removed.</p> <p>D – The provision of street lighting in most cases is covered by highways rather than planning powers and would not be considered as part of a planning application unless comprehensive redevelopment was proposed. Furthermore, not all lights will be in correct location for electric vehicle charging. Suggest amending to ‘where appropriate’.</p>	
BHA4	Housing Delivery	<p>A1 – ‘Social housing’ should be changed to ‘affordable housing’ to reflect the terminology used widely in other Plans and the NPPF.</p> <p>A3 – Is there an evidence base of local need</p> <p>A4 This would be delivered through CIL etc and should not be included here.</p> <p><b>Policy BHA4 does not meet the Basic Conditions (having regard to national policies /general conformity with strategic policies)</b></p>	Yes

## Lee Neighbourhood Plan Submission Consultation

BHA5	Windfall Sites	<p>A site should not necessarily have to demonstrate it is underused before being brought forward for development. This will depend on the existing use of the site and should be determined on a case-by-case basis in accordance with other development plan policies. This clause would benefit from re-wording to make clear that use of under-used sites is welcomed, but not a condition of bringing a site forward for redevelopment.</p> <p><b>Policy BHA5 does not meet the Basic Conditions (achievement of sustainable development / general conformity with strategic policies).</b></p>	Yes
BHA6	Design of New Development	<p>The threshold of the size of development to which the parts of this Policy apply should be clarified., particularly A3 as Energy efficiency standards vary according to scale of development in the London Plan. (update ref to London Plan). The phrase ‘environmentally conscious design’ is also unclear. It would be better to refer to high standards of sustainability or similar, e.g. highly sustainable design.</p> <p><b>Policy BHA6 does not meet the Basic Conditions (achievement of sustainable development / general conformity with strategic policies).</b></p>	Yes
	Site Allocations	Support the deletion of the four Site Allocations within RBG	
4.3.8	Existing Policies	Add in RBG Policy OS(d), CH1, CH2 and CH(a)	
<b>LOCAL RETAIL, LEISURE AND LOCAL ECONOMY</b>			
Table 5	Retail, Leisure and Employment Sites	Lee Green District Centre is proposed to become a ‘District Hub Opportunity Area’. This is not recognised terminology in the retail hierarchy, which in any case is determined at a Regional level. It would be useful to include a column showing which Borough the site is in.	
RLE1	Maintain, Improve and Sustain the	‘Employment’ ‘socio-cultural’ and ‘leisure’ should be defined as these terms are open to interpretation. Reference to the Use Classes Order would be more appropriate, particularly	

## Lee Neighbourhood Plan Submission Consultation

	Diversity, Vitality and Viability of Retail Sites	Classes E and F. It is important to recognise that retail falls within Use Class E, and that planning policy cannot control the loss of existing retail use where the change is to another use within Class E.	
RLE2	Improve Shopfronts and Advertising in Retail Sites	<p>Whilst we agree with the principles of this policy, it is important to note that many changes to shopfronts will not require planning permission (e.g. installation of internal security shutters).</p> <p>Clause B is not needed. Adverts and signage usually fall under the advert regulations for determination, which only assess the impact on public safety and amenity. Some advertisements do not require consent.</p>	
RLE3	Improve and Enhance the Public Realm of Retail/ Cultural Activity Sites	<p>Reference to retail/cultural activity sites would be better rephrased to retail centres, to reflect existing Local Plan designations.</p> <p>As in 3.3 above, the threshold of 150sqm is arbitrary and inappropriate. It is difficult to imagine how a small retail site of 150sqm could meet all of the criteria set out as it may in practice have little to no public realm. The policy is more appropriate for major development affecting the public realm. Furthermore, there could be an overlap between the requirements of this Policy and improvements to the area that could be sought through S106/CIL. Suggest reword to “proposals in respect of retail centres should where possible, aim to ...” otherwise the Policy, particularly Criterion 4, is too onerous. The reference to 10 residential units appears inappropriate here, including it indicates that residential use is appropriate in retail locations, which may not always be the case.</p> <p><b>Policy RLE3 does not meet the Basic Conditions (achievement of sustainable development / general conformity with strategic policies).</b></p>	Yes

## Lee Neighbourhood Plan Submission Consultation

RLE4	Protect and Encourage Local Employment Sites	<p>It is unclear whether the entire Policy only applies to existing Local Employment Sites identified in Table 5, this needs to be clarified</p> <p>A – Planning can secure / protect land for a particular use but cannot reserve it for a particular business or occupier.</p> <p>C&amp;D – Reference to use class B1c is no longer appropriate as this now falls within new use class E</p> <p><b>Policy RLE3 does not meet the Basic Conditions (achievement of sustainable development / having regard to national policies).</b></p>	
RLE5	Revitalise Lee Green Town Centre	<p>A – amend policy to say ‘where possible / where appropriate’ as some criteria will not be valid for all schemes.</p> <p>B – It is not clear who is to prepare the Masterplan? Further actions listed in para 4.4.6 suggest that this will be for the Forum and the Boroughs, but the Neighbourhood Plan cannot tell the Councils to prepare a document, this is for the LA’s to determine. It is not clear if numbered criteria 1–9 are policy or suggested future content for a proposed Masterplan. Suggest deleting RLE5B in its entirety or moving from policy to the recommendations section of the chapter or to the ‘Priority Projects’ section. If retained it needs to be clearly reworded and the opportunity taken to update the references to use classes to reflect new class E.</p> <p><b>Policy RLE5 does not meet the Basic Conditions (achievement of sustainable development / having regard to national policies).</b></p>	Yes

## Lee Neighbourhood Plan Submission Consultation

Figure 13	Lee Green District Town Centre Strategy	<p>This map is unclear. Suggest different shading to differentiate between Heritage Buildings and Greenspace.</p> <p>'Heritage Buildings of Townscape Merit' is not a recognised heritage classification. They cannot be protected through the Neighbourhood Plan and '(to be protected)' should be deleted from the key.</p> <p><b>Fig 13 does not meet the Basic Conditions (having regard to national policies).</b></p>	
<b>HERITAGE AND DESIGN</b>			
Figure 14	Built Heritage Assets	Rename 'Proposed Conservation Areas' as 'areas to be put forward for designation as Conservation Areas'	
HD1	Designation, Conservation and Enhancement of Heritage Assets	<p>While non-designated heritage assets can be identified through the neighbourhood plan making process, the Planning Practice Guidance for the Historic Environment is clear that decisions to identify non-designated heritage assets must be based on sound evidence. Historic England further advises that there should be a consistent and accountable approach to the identification and management of local heritage assets, selected by uniform criteria.</p> <p>Figure 14 shows 'proposed conservation areas' and Figure 13 (in a previous section of the plan) shows 'heritage buildings of townscape merit - to be protected'. It is not clear if these are intended to be 'non-designated heritage assets'. If they are, they need to be clearly identified as such, with a list of addresses in an appendix to the Plan. Robust justification would need to be provided, including evidence of consultation with land owners. The 'heritage and character assessment' evidence report, lists buildings identified as being of heritage interest during a 'site walkover'. It is not clear if, or how, this list of buildings relates to the proposed conservation areas or heritage buildings of townscape interest, but it is not considered to be sufficient evidence for to justify identification as 'non designated heritage assets'.</p>	Yes

## Lee Neighbourhood Plan Submission Consultation

		<p>Reference to ‘Non designated heritage assets’ in this Policy requires clarification; it should be clear that such buildings are those on the Councils’ local list only. There is concern that this Policy could be misinterpreted as applying to areas shown as ‘heritage buildings of townscape merit’ or to ‘proposed conservation areas’</p> <p>A1 – The phrase ‘architectural authenticity’ is not consistent with the NPPF tests when referring to heritage assets. It would be better to refer to ‘interest’, ‘quality’ or ‘significance’ here.</p> <p>It is important to note that many ‘public realm heritage features’ can be removed without planning consent. It would be useful to identify a list of these features and their locations, in line with the principles of identifying non-designated heritage assets above.</p> <p><b>Policy HD1 does not meet the Basic Conditions (having regard to national policies /general conformity with strategic policies).</b></p>	
HD2	Design and Scale of New Development	<p>The policy should reference the need to submit a Design and Access Statement, the RBG Local validations List requires this for major developments and the level of detail should be proportionate to the development proposal.</p> <p>A3 – front walls can be permitted development up to 1m and existing walls above 1m can often be rebuilt under permitted development. This should therefore be removed or altered accordingly.</p> <p>C2 – references to Lifetime Homes standards should be removed as these are no longer applicable. Accessibility standards are now controlled through Building Regulations.</p>	



## Lee Neighbourhood Plan Submission Consultation

HD3	Extensions and Alterations to Existing Buildings	This policy is too prescriptive in favour of a traditional architectural approach, non-traditional proposals which provide a high quality outcome may be considered appropriate.  <b>Policy HD3 does not meet the Basic Conditions (general conformity with strategic policies).</b>	Yes
4.5.6	Recommended Conservation Areas	It should be noted that RBG has a Conservation Area Designation Procedure Note, which sets out the process through which community groups can nominate areas for conservation area status. These areas cannot be afforded the protection akin to designated Conservation Areas in advance of their formal designation.  <b>This section does not meet the Basic Conditions (having regard to national policies).</b>	Yes
<b>SECTION FIVE – AREA DESIGN GUIDANCE</b>			
		This Design Guidance section reads as Policy rather than guidance; its status needs clarification. It is not directly referred to in any of the Neighbourhood Plan Policies. The Design Guidance could be taken out of the Neighbourhood Plan, and published as a separate document; which would also help to reduce the length of the Plan.	
P163	Locally specific design guidance for Lee Green District Centre	Suggest ‘protect, preserve or enhance’ rather than ‘sustain, reinforce and / or enhance’ to align with recognised policy wording at national and local levels. Reference to ‘Conservation Area is being proposed’ should be amended to ‘The Forum intend to put forward an area for Consideration as a Conservation Area’	
Figure 21	East Lee Area	This map does not have a key	

## Lee Neighbourhood Plan Submission Consultation

P187	Opportunities	Final bullet point is too onerous and not acceptable. All new development cannot address physical connections outside of their site boundaries.	
<b>SECTION SIX – LEE FORUM PRIORITY PROJECTS</b>			
		This section would benefit from an introduction to clarify that these are future aims and not policies in the Neighbourhood Plan. The link to CIL should be more explicit.	
P197	Actions	Bullet 2 – Amend “ensure updates to Local Plans” to “seek to influence Local Plans....”	
P209	New Tiger’s Head	Current wording suggests RBG support for New Tiger’s Head to be a community centre. This would not be the only appropriate use for the building, so reference to RBG within the actions should be deleted.	
P211	Lee Green Master Plan	Reference to the Local Councils preparing a Master Plan should be deleted.	
<b>DELIVERY STRATEGY</b>			
7.2	Delivery Strategy	Para 7.2 suggests that the Forum be allowed to review draft S106 planning agreements. This is not considered to be appropriate and should be deleted.	
P.218	First Bullet	Amend ‘adhered to’ to ‘planning approvals are in accordance with the Neighbourhood Plan unless material considerations indicate otherwise’	
Table 8	Monitoring Implementation	Measurable targets will need a baseline. (eg tree cover?)	

## Lee Neighbourhood Plan Submission Consultation

Annex 1	Shop Front Design Guidance	This section should be removed from the Neighbourhood Plan and published with the Design Guidance section in a separated document.	
Annex 2	Lee Forum Area Profile and History	This section should be removed from the Neighbourhood Plan and published as part of the Evidence Base.	
Annex 3	How the Lee Forum Area Relates to the Wider Area	<p>This section should be removed from the Neighbourhood Plan and published as part of the Evidence Base.</p> <p>3.2.1: Update ref to RBG Core Strategy and Site Allocations Local Plan</p> <p>3.2.3: The Neighbourhood Plan cannot introduce a requirement that the aims of the Plan be respected as part of any future development outside of the Neighbourhood Area boundary. policy here concerning land outside of the Neighbourhood Area</p>	
Annex 4	Key Evidence Reports	It would be better for these reports to be published on the Forum's website and hyperlinks added here.	