



Planning Policy
Royal Borough of Greenwich

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By email: planning.policy@royalgreenwich.gov.uk

13th April 2022

Draft Lee Neighbourhood Plan Consultation

Dear Sir/Madam,

I refer to the above consultation on the Lee Neighbourhood Plan. Thames Water are the statutory water and sewerage undertaker for the area and as such have the following comments to make on the plan.

General Comments

The plan identifies a number of development sites but no detail is provided of the proposed scale of development. Consequently it has not been possible to undertake a high level review of water and wastewater infrastructure capacity to serve the sites.

Water and Wastewater Infrastructure

New developments have the potential to adversely impact on the water and sewerage networks resulting in issues such as sewer flooding, pollution of land and watercourses or problems of low/no water pressure. To avoid such issues arising it is essential that new development is aligned with any necessary water or wastewater network upgrades where there is insufficient current capacity.

In accordance with Policy IM1 of the Greenwich Core Strategy and Spatial Policy 1 of the Lewisham Core Strategy, where there is insufficient existing capacity in the water and/or wastewater networks planning conditions may be required to ensure that the relevant phase of any development is not occupied until any necessary water or wastewater network upgrades have been completed.

To assist with ensuring that development is aligned with any necessary infrastructure provision it is requested that the following supporting text is added to the Neighbourhood Plan under Section 4.3.7:

“Developers are encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

I trust that the above comments will be given due consideration.

Yours faithfully,

Chris Colloff

Thames Water Utilities Limited

Email: planning.policy@royalgreenwich.gov.uk

Our ref: PL00607086

Planning Policy Team,
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Telephone 020 7973 3717
Fax

28 April 2022

Dear Planning Policy Team

Regulation 16 Consultation : Lee Neighbourhood Plan LB Lewisham and LB Greenwich

Thank you for consulting Historic England in respect of the Regulation 16 application for the Lee Neighbourhood Development Plan.

The Government through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012) has enabled local communities to take a more pro-active role in influencing how their neighbourhood is managed. The Regulations require Historic England, as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest to be affected by the Plan. As Historic England remit is advice on proposals affecting the historic environment our comments relate to the implications of the proposed boundary for designated and undesignated heritage assets.

Historic England previously commented on the consultation for the establishment of the Forum and Boundary, SEA screening opinion and Scoping Report. In commenting on the boundary we drew attention to the desirability for NDP boundaries to encompass conservation areas in their entirety, ensuring that relevant borough and neighbourhood policies are operated in a consistent manner. In this instance the boundary of the neighbourhood area includes two sections of the Blackheath Conservation Area. However, we now recognise that the boundary has been logically drawn to follow the Ward boundary and as such are content with the boundary as drawn.

We are of course pleased to note the strong emphasis on preserving and enhancing the heritage of the Lee Neighbourhood area and the inclusion of specific Heritage design policies. We also note the intention to promote the designation of new conservation areas within the plan area and the inclusion of design guidance. We do not wish to make detailed comments regarding the potential conservation area designations at this stage as these should be reviewed by the local planning authority and subject to formal assessment prior to consultation on the basis of our Heritage Environment Advice Note No.1; Conservation Area Appraisal, Designation, and Management (<https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>)



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Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

We can however offer a number of observations and recommendations which we hope will strengthen the aims of the current draft plan in respect of the implications for the historic environment.

In respect of the proposed Heritage Policies we can offer the following suggested modifications which, in our view, would help the clarity of the intention of these policies.

Policy HD1 would benefit from clarification as to whether this refers to all development proposals or development specific to works to existing heritage assets and their setting (including conservation areas). Policies 2 and 7 could be applied to all new development. The Policy is titled *Designation, conservation and enhancement of Heritage Assets*. The policy does not appear to specifically refer to designation issues and might be therefore more clearly be titled *Conservation and enhancement of Heritage Assets*. We would also suggest amendment as follows:

- *Policy 1 Protect, conserve or enhance the architectural authenticity of heritage assets and their contribution to the area's townscape quality and character.*
We would suggest replacing “authenticity” with “significance” as this better aligns to the policies set out in the NPPF. This would also be helpful in clarifying the use of “enhancement” which can be defined as enhancing the significance of the asset/s affected in accordance with the NPPF.
- *Policy 2 Ensure that design of future developments respect, enhance and utilise the heritage assets and their features in order that they sympathetically integrate into the local character and identity.*
Consider replacing this with “Should respond sympathetically to local character, identifying and demonstrably seeking opportunities to reflect the areas character and appearance and those features which contribute positively to its significance. Where appropriate, developments should seek opportunities to bring into beneficial use vacant and under-utilised heritage assets”
- *Policy 4. Ensure that any additional enhancements take every opportunity to sympathetically incorporate sustainable design features which enhance the building's energy efficiency whilst protecting its character and heritage value especially where this makes a demonstrable positive impact on the public realm.*
We would suggest replacing “enhancements” with “alterations and additions”. This could be clarified to read “Alterations and additions affecting a heritage asset should seek to incorporate sustainable design and energy enhancing features which are sympathetic to the character and appearance of the asset and its contribution to the wider character area”.
- *Policy 5. Protect buildings' principal facades, especially where impact to the public realm can be demonstrated. Where proposed works allow, the opportunity to repair and reinstate lost or damaged architectural features which contribute to the integrity of the townscape should be given due consideration.*
This policy could be strengthened to state “Where principal facades makes a positive contribution to the character and appearance of the townscape these should be retained, unless it is clearly demonstrated it is unviable to do so and the public benefits outweigh its loss and significance. Proposals which demonstrably enhance the historic and architectural character and appearance of the façade through the



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repair and reinstatement of lost or damaged architectural features will be supported”. We consider this aligns more closely with NPPF Policies 197 and 203.

- *Policy 6. Where possible demonstrate that opportunities have been taken to reinstate particular design features where these have been removed, to minimise any disruptions to the streetscape character.*

This is partly covered by Policy 5. However, we would suggest the wording along the following lines for all heritage assets. *Development must demonstrate that opportunities have been taken to identify and reinstate particular design features where these have been lost and where reinstatement will enhance the significance of the heritage asset and its wider contribution to townscape.*

- *Policy 7. Support the retention wherever possible of public realm heritage features such as street-lights, pillar boxes, public phone boxes, shop signage and street name signage.* New large-scale development or highways works are most likely to potentially impact on these elements (with the exception of shop signage). We would therefore suggest that separate public realm and shopfront policy might better reflect the intentions of this policy. It would also be sensible to also apply a specific public realm policy to HD2 which places an emphasis on new development to deliver these aims, where possible.

In respect of Policy HD2. Policy A 1. We would suggest that the statement “*The scale, massing and orientation of sustainable buildings, streets and spaces must be taken into account*” needs clarification. Should this read “existing” rather than “sustainable” as the policy is understood to refer to the current surrounding context?

In respect of Policy HD3 B. *Regard is had to the detailed design guide within this Neighbourhood Plan.* This could be strengthened by requiring proposals to demonstrate regard to the design guide within any accompanying design and access statement and/or heritage statement.

Page 136. Replace English Heritage with Historic England as following the separation of these organisations Historic England publishes guidance and advises the local authority on conservation area appraisal and designation.

We do not wish to comment in extensive detail on the Area Design Guides as the local authority conservation team are better placed to review local character. However, we can offer the following observations.

The Design Guides are broadly drawn but usefully highlight current issues and opportunities. They would nevertheless benefit from greater detail and illustration to effectively provide guidance as to the appropriate form for new development. This could include helping define the positive characteristics of an areas character, key views and the issue of development within the setting of key local landmarks and views. Appendix 4, which has presumably informed these sections, is inaccessible and we therefore wonder if there is not greater detail which could be brought forward to inform these sections, including illustrating both positive and negative design within the area to help guide future development. Lee does not fall within any designated archaeological priority areas however we would recommend that new development be aware of the potential for unknown archaeology and the potential for this to inform understanding and the design for new development and public realm works.



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Historic England has recently updated its Neighbourhood Planning and the Historic Environment: Historic England Advice Note No 11 which provides guidance on integrating heritage into neighbourhood plans. The neighbourhood may therefore find this section useful in developing the design guidance section.

<https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-historic-environment-advice-note-11/>

The MHCLG National Design Guide also sets out a clear framework for how new development can be encouraged to provide contextual sustainable communities.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962113/National_design_guide.pdf

Conclusion

Thanks for consulting Historic England on the draft plan. We consider that subject to the consideration of the above comments that the proposed plan provides a positive framework for the protection of the historic environment and for the future sustainable development of the Lee NDP area. We would be pleased to provide further advice or clarification should this be required.

Finally, I must note that this advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this application, and which may have adverse effects on the historic environment

Yours sincerely

Richard Parish
Historic Places Adviser
Direct line 020 7973 3717
Fax 020 7973 3792

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From: Planning South <Planning.South@sportengland.org>
Sent: 15 March 2022 13:40
To: planning.policy@royalgreenwich.gov.uk
Subject: Greenwich 2022 - Lee Neighbourhood Plan Submission - Regulation 16

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely

Planning Administration Team
Planning.south@sportengland.org

Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our website, and our Data Protection Officer can be contacted by emailing Gaile Walters

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From: Mike Priaulx <swifts.planning@gmail.com>
Sent: 06 May 2022 23:43
To: planning.policy@royalgreenwich.gov.uk
Subject: comment - Lee Neighbourhood Plan Submission - Regulation 16 Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Catherine McRory/ consultation team,

I am writing with a comment regarding the above consultation. If you are able to acknowledge receipt and keep me informed of updates to the Lee Neighbourhood Plan, that would be much appreciated.

I strongly support Policy GB1 Protection and Enhancement of Green Spaces, and Policy GB2 Achieving a Green Infrastructure-led Development Approach, and in particular the references to net greening and enhanced biodiversity.

However, there is no acknowledgement of the urban species of wildlife which traditionally use the fabric of older buildings to nest and roost and are recorded in Lee - bats, and swifts, house sparrows, starlings, and house martins. All these bird species are now red listed in the UK due to rapidly declining numbers as their nest sites are lost and not replaced. These species are cavity-nesting species so cannot use the green infrastructure to nest unless it is specifically designed to be suitable for them, e.g. by provision of suitable nest boxes or integrated nest spaces such as swift bricks.

I request that an additional note is added to Policy GB2 A:

* Provide artificial nest sites that are of particular relevance and benefit in an urban context. This reflects policy G6 B4 of the London Plan 2021 (page 325), which calls for: "artificial nest sites, that are of particular relevance and benefit in an urban context": https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

This also reflects the Mayor of London's Urban Greening for Biodiversity Net Gain: A Design Guide (March 2021) (Design Opportunities: Facades, page 20) which states: "Provide artificial nesting and roosting sites for bats, birds and solitary bees." <https://www.london.gov.uk/what-we-do/urban-greening-biodiversity-net-gain-design-guide>

Many thanks.

Any questions at all please let me know.

Regards,
Mike Priaulx

London Representative - Swifts Local Network: Swifts and Planning Group

Tel. 07814 791871

MACEY & CO

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Our Ref: TJM/FW MS. 94

22 April 2022

Planning Policy Team
The Woolwich Centre
Wellington Street
Woolwich
SE18 6HQ

By post and email: planning.policy@royalgreenwich.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



T J Macey

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