



Basic Conditions Statement

Grove Park Neighbourhood Plan
2018-2033

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The Grove Park Neighbourhood Plan (Submission version) has been prepared with the help of Mapping Futures with Changing Cities, and with contributions by associate colleagues James Hulme and Imogen Humphris. It is, however, a collective effort, involving much input and text from the residents themselves.

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1 Introduction

1.1 Purpose of Document

This Basic Conditions Statement details how the proposed Grove Park Neighbourhood Development Plan (GPNP) meets the basic conditions – and is in general conformity with the strategic, local and EU policies and obligations, in accordance with the requirements set out in:

- Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended)¹ (taking into account the documents that must be included as part of the submission of the plan proposal – see Table 2).
- Regulations 32 and 33 of the Neighbourhood Planning (General) Regulations 2012 (as amended) (taking into account the EU legislation in particular the need for a Habitats and Environmental Impact Assessment – see Section 6)
- Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990² (ensuring that the draft GPNP (and NDO if applicable) meets the basic conditions – see Sections 2 to 5).
- Paragraph 37 NPPF 2019 (which states that basic conditions and legal requirements must be met and tested through an independent examination before the neighbourhood plan may proceed to referendum).

The Neighbourhood Plan will form part of the Local Development Plan and must conform with other national, regional and local planning policies. Together with other planning policy documents, it will provide the framework for the determination of planning applications and contribute to the achievement of sustainable development. The GPNP does not duplicate these policies but rather seeks to reinforce their application at the neighbourhood level. It supports and upholds the general principle that the strategic policies of the London and Local Plans are concerned with, and provides an additional level of detail and/or a distinct local approach without undermining those policies.

¹ Neighbourhood Planning Regulations

- As amended (2012) - <http://www.legislation.gov.uk/uksi/2012/637/contents/made>
- The Neighbourhood Planning (General) (Amendment) Regulations 2015 - <http://www.legislation.gov.uk/uksi/2015/20/regulation/2/made>
- The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016 - <http://www.legislation.gov.uk/uksi/2016/873/regulation/4/made>

² Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (also schedule 10 of the NPR 2012) <http://www.legislation.gov.uk/ukpga/2011/20/schedule/10/enacted#>

1.2 Structure of Basic Conditions Statement

This statement is set out as follows, demonstrating how it conforms to the requirements:

- **Section 1** – Confirms how the prescribed conditions and legal obligations are met in relation to the GPNP.
- **Section 2** – Defines how the making of the GPNP contributes to the achievement of sustainable development.
- **Section 3** – Sets out how the GPNP has regard to national planning policies and advice set out in the National Planning Policy Framework (NPPF 2019).
- **Section 4** – Explains how the GPNP is in general conformity with the strategic policies of the London Plan (2016).
- **Section 5** – Explain how the GPNP is in general conformity with the Lewisham Local Plan (2011 to 2026).
- **Section 6** – Outlines how the making of the GPNP does not breach, and is otherwise compatible with EU obligations and summarises the Strategic Environmental Assessment (SEA) screening and Habitats Regulations Assessment (HRA) reports.

1.3 Demonstrating Compliance with Basic Conditions

In accordance with Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act (1990), the Grove Park Neighbourhood Forum (GPNF) can hereby confirm that all overarching prescribed basic conditions are met, as outlined in Table 1.

Paragraph 8(2)	Compliance Details
8(2) (a) <i>having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</i>	Section 3: details how the GPNP has regard to The National Planning Policy Framework 2019 ³ (NPPF 2019).
8(2) (b) <i>having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order.</i> 8(2) (c) <i>having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order.</i>	No neighbourhood development order has been made specifically to a listed building or conservation area. The GPNP policies have regard to heritage assets in the neighbourhood, including the listed Baring Hall Hotel (Grade II).
8(2) (d) <i>the making of the order contributes to the achievement of sustainable development,</i>	Section 2 – Achievement of Sustainable Development: details how the GPNP contributes to the achievement of sustainable development.
8(2) (e) <i>the making of the order 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),</i>	Section 4 – Conformity with Strategic Policies of the London Plan: details how the GPNP is in general conformity with the strategic policies of the London Plan, and: Section 5 – Conformity with the Local Development Plan: details how the GPNP conforms to Lewisham’s Local Development Framework.
8(2) (f) <i>the making of the order does not breach, and is otherwise compatible with, EU obligations, and</i>	Section 6 – EU Obligations: demonstrates how the ‘making’ of the neighbourhood plan does not breach, and is otherwise compatible with EU obligations.
8(2) (g) <i>prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.</i>	No neighbourhood development orders have been made. Prescribed matters in relation to the GPNP are complied with as detailed above.

TABLE 1: CONFORMITY WITH PRESCRIBED CONDITIONS

³ National Planning Policy Framework (2019) - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

1.4 Compliance with Legal Requirements

This basic conditions statement has been prepared by the qualifying body Grove Park Neighbourhood Forum (GPNF) to accompany the submission of its Neighbourhood Development Plan to the Local Planning Authority of Lewisham. It confirms:

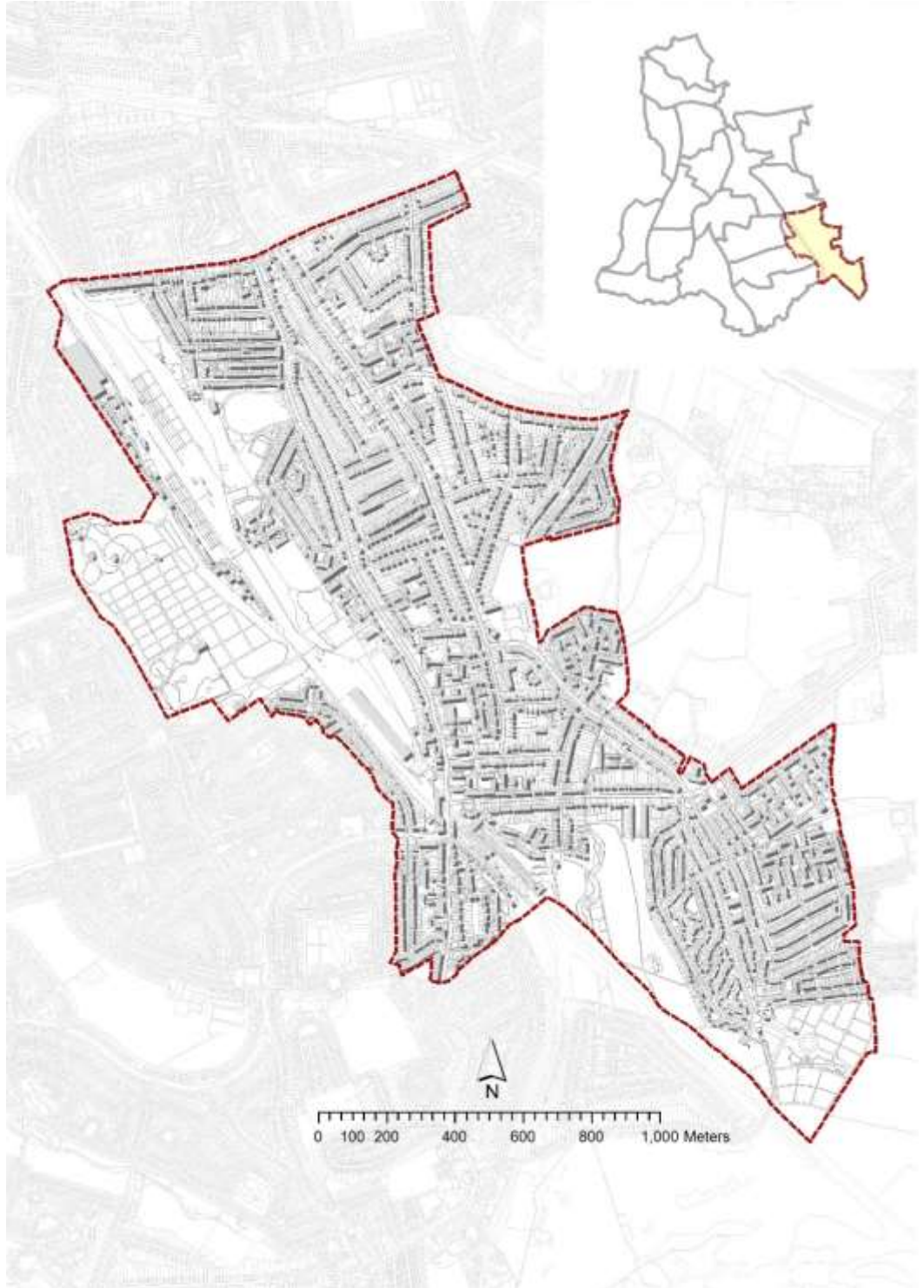
- **Qualifying Submitting Body:** The Grove Park Neighbourhood Forum (GPNF) which became a qualifying body for the purposes of neighbourhood planning, in accordance with the Localism Act (2011)⁴, on 22nd October 2014. Designation was approved by the Mayor and Cabinet meeting⁵.

Neighbourhood Area: The GPNF is responsible for the proposed Neighbourhood Development Plan within the area demarcated by the approved neighbourhood area

⁴ Localism Act 2011 - http://www.legislation.gov.uk/ukpga/2011/20/pdfs/ukpga_20110020_en.pdf

⁵ Mayor and Cabinet Meeting, London Borough of Lewisham, October 22nd 2014 - <http://councilmeetings.lewisham.gov.uk/documents/s32015/Minutes%20October%2022.pdf>

boundary⁶ (as illustrated in



- Figure 1) and can confirm that there are no other submitted Neighbourhood Plans for the same area. Note that the GPNF shares its northern boundary along South Circular Road with the Lee Neighbourhood Forum.
- **Plan Timeframe:** The proposed GPNP is for a period of 15 years from 2017 – 2032.
- **Plan Content:** The Grove Park Neighbourhood Forum hereby confirm that the GPNP relates to the planning matters in relation to the use and development of land within the designated Grove Park Neighbourhood Area and does not relate to excluded development (e.g. national infrastructure projects or mineral extraction) as defined by Town and Country Planning Act 1990, s61K and the Planning and Compulsory Purchase Act 2004, s38B(6).

⁶ Grove Park Neighbourhood Forum Area Map - <https://lewisham.gov.uk/myservices/planning/policy/ldf/neighbourhood-plans/grove-park-neighbourhood-forum-and-area>

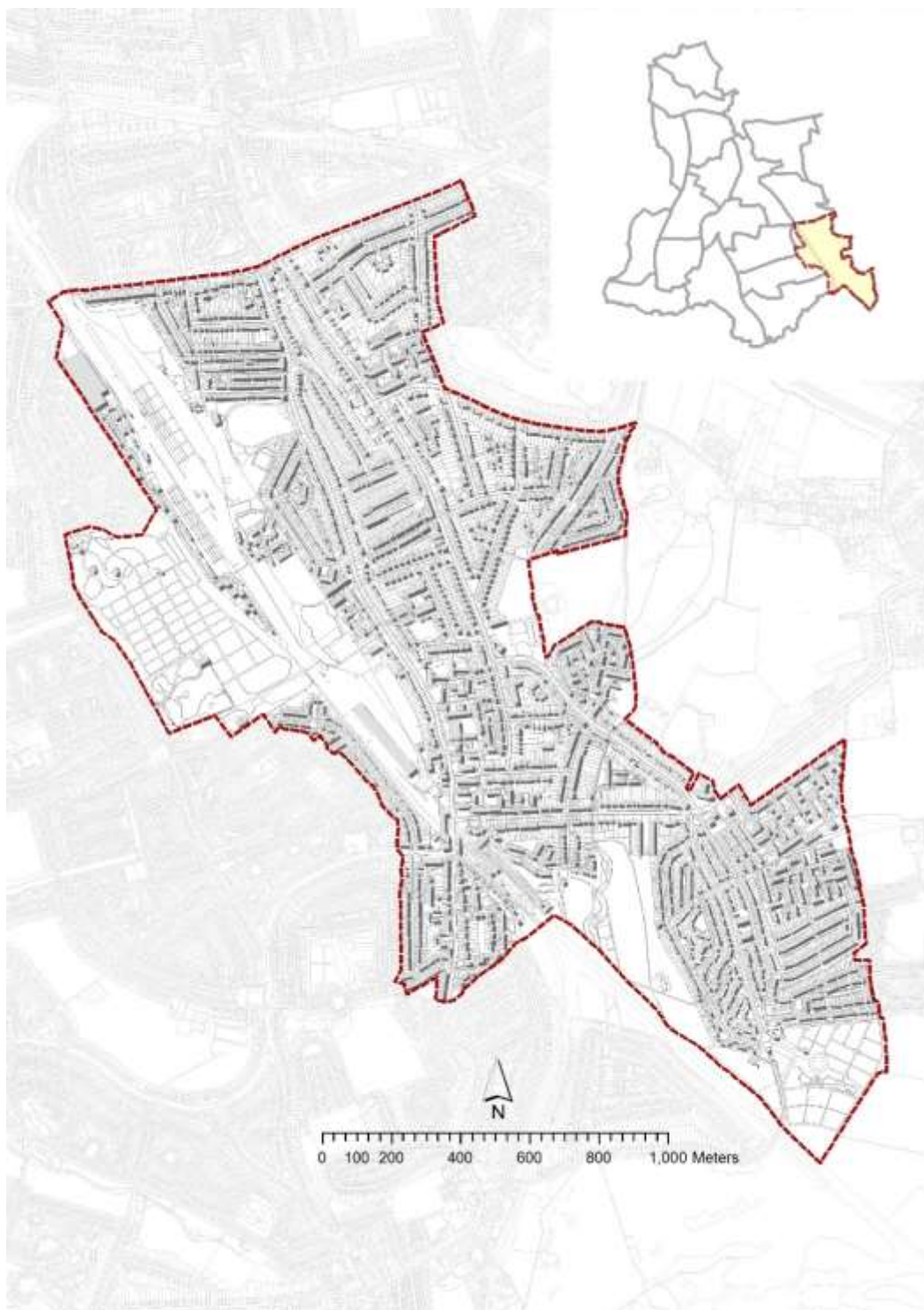


FIGURE 1: DESIGNATED GROVE PARK NEIGHBOURHOOD PLAN AREA

1.5 Submission Package (Regulation 15)

The Grove Park Neighbourhood Plan submission package includes the documents listed by regulation 15 of the Neighbourhood Planning Regulations (as amended, 2012):

Regulation 15 Clause	Submission Details
15(a): a map or statement which identifies the area to which the proposed neighbourhood development plan relates	Annex I Introduction to Grove Park: includes a map and details the neighbourhood context to which the proposed neighbourhood plan relates to. It highlights what is unique about the area. The designated area is also illustrated in Figure 1 and throughout the Grove Park Neighbourhood Development Plan (GPNP).
15(b): a consultation statement	Statement of Consultation: details the engagement and consultation outcomes.
15(c): the proposed neighbourhood development plan	Grove Park Development Plan Policies: the proposed planning policies that will govern development within Grove Park designated neighbourhood boundary. Annex II Neighbourhood Analysis and Appendices 1 - 14: details the body of background evidence gathered through various means to ensure due consideration is given to the real needs of Grove Park and support the reasoned justifications of each policy.
15(d): a statement explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Act.	Basic Conditions Statement: details how the GPNP meets the requirements of paragraph 8 of Schedule 4B to the 1990 Act.

TABLE 2: NPR (2012, AS AMENDED) REGULATION 15 CORRESPONDING SUBMISSION DOCUMENTS

2 Achieving Sustainable Development

This section details how the GPNP contributes to the achievement of sustainable development. The National Planning Policy Framework (NPPF 2019) defines three dimensions of sustainability (Section 2 of the NPPF):

- **Economic Sustainability** - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
- **Social Sustainability** - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support community health, social and cultural well-being.
- **Environmental Sustainability** - to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The GPNP sets out a comprehensive and creative vision for the neighbourhood, responding to the issues it currently faces, with policies that seek to enhance and improve the place and the wellbeing of its residents. For example, policies CA1-CA2 seek to improve and enhance the current dilapidated social infrastructure and policies NC1-NC2 and EM1-EM2 promote the conditions for allowing local businesses and enterprise to flourish, forming an overall sustainable neighbourhood: one that is liveable, sociable, walkable, healthy and supports a prosperous, independent local economy.

Sustainable development will be met by addressing people's quality of life and seeking positive improvements in the economic, social and environmental wellbeing of neighbourhoods. The GPNP achieves sustainable development through its nine interrelated policy objectives and supporting policies:

- **Protect Grove Park's Heritage Assets** - Protect, conserve, connect and enhance Grove Park's heritage by promoting and celebrating these natural, architectural and cultural assets to generate a healthy, liveable neighbourhood with a distinctive 'sense of place' and a visitor destination for the benefit of everyone.

- **Renewal of Grove Park’s Neighbourhood Centre** - Designate the neighbourhood centre as a regeneration area to revitalise Grove Park into a vibrant centre with a variety of independent businesses. This will bring the much needed investment to provision for social infrastructure, new retail units and more residential units in mixed-use developments along a greener high street.
- **Achieve Quality of Built Environment** - Protect and conserve existing landmarks and buildings of architectural merit and promote biophilic-led design of new build that instils a high quality new heritage vernacular for Grove Park to be proud of in the future. The plan sets high standards to create a healthy, climate resilient and a sustainable built environment.
- **Provide Thriving Community Spaces** - Safeguard, invest in and enhance the few community assets and spaces left to ensure a healthy mix of services and facilities. Enhance community assets to become vibrant community hubs for many generations to come, offering a diversity of arts, culture and recreational activities that residents of all ages, ethnicity and culture can enjoy.
- **Provide Quality Affordable Homes** - Maintain an emphasis on family orientated housing of two to three bedrooms, without a predominance of one tenure over another in new developments. Allocate areas for new housing of highest quality. Seek opportunities for densification in appropriate places while maintaining a street-based vernacular.
- **Create Micro-Enterprise Local Employment Opportunities** - Promote micro-enterprise by designating Micro-Enterprise Employment Sites to serve as affordable workspaces for artisan, start-up, social enterprise, creative and self-employment endeavours.
- **Improve Sustainable Transport Provision** - Promote and enhance sustainable transport measures for all modes.
- **Deliver Connected Nature Areas and Urban National Park** - Protect, conserve, enhance and connect Grove Park’s natural heritage assets and create a world-class Linear Natural Parkland Nature Trail to realise the ‘Railway Children Urban National Park’ Vision as an outer London destination that passes through different ecosystem habitats and provides a resource for fresh-air learning, healthy recreation and wellbeing, and a sanctuary for wildlife.
- **Create a Sustainable Healthy Environment** - Ensure all retrofitting, new development and renovation considers climate adaption, sustainability of resources and delivers design that promotes the (physical and mental) health and wellbeing of occupants. Development will also address the wider determinants of health, including air pollution, water pollution and access to nature.

Table 3 summarises the alignment between the sustainable development goals set out in the NPPF and the GPNP.

NPPF Objective	GPNP Aims	GPNP Policies	Achievement Statement
Economic Sustainability	<ul style="list-style-type: none"> • Renewal of Grove Park’s Centre • Provide Quality & Affordable Homes • Create Micro-Enterprise Local Employment Opportunities • Improve Sustainable Transport Provision 	<ul style="list-style-type: none"> • Policy NC1: Enhancement of Grove Park Local Neighbourhood Centre and Shopping Parades • Policy NC2: Grove Park Neighbourhood Centre Regeneration Area • Policy H1: Delivering a Healthy Mix of Housing and Quality Design • Policy H2: Promoting Affordable Local Ownership • Policy H3: Windfall Sites • Policy SA1: Vacant land, Lions Close • Policy SA2: Cleared Land on Grove Park Road • Policy SA3: Bus Waiting Area & Vacant Land at Rear • Policy SA4: Lewisham Adult Education Centre • Policy SA9: Former Boxing Club • Policy SA10: W.G. Grace Site and Curtilage • Policy EM1: Protect Micro-Enterprise Employment Sites • Policy EM2: Conversion of Unused Garages To Promote Micro-Enterprise • Policy SA8: Land to rear of Baring Hall Hotel • Policy T1: Enhancement of Key Active Travel Routes • Policy T2: Promote the Use of Sustainable Vehicular Options 	<p>The GPNP responds positively to sustainable and meaningful growth by allocating sites for housing (Policy H1-H3 and SA1, SA2), mixed-use development (Policy NC2 and SA3, SA4, SA10), micro-enterprise (Policy EM1-EM2 and SA8), and community spaces (Policy CA1-CA23 and SA5, SA6, SA7).</p> <p>Additionally, the GPNP proactively supports sustainable economic development to deliver homes (Policy H1-H3 and SA1, SA2, SA3, SA4, SA9, SA10) as well as promote employment opportunities through Policy EM1-EM2, SA8, to support the rising self-employment sector who require affordable and smaller business units.</p> <p>The proposed regeneration area of the neighbourhood centre will support a resilient local economy and better serve the local convenience needs of residents. It will bring in the much needed investment to address poor social infrastructure provision in and around the centre to help promote a thriving local meeting place that residents would want to visit and local businesses will benefit from. In this way, it will help to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.</p> <p>The GPNP ensures that patterns of proposed growth are in sustainable locations, making the fullest possible use of public transport nodes as well as promoting improved walking and cycling through Policy T1-T2).</p> <p>The GPNP is proposing the most intense growth within the Neighbourhood Centre (Policy NC2) to make fullest possible use of access to public transport train services, and to consolidate services so that they are more easily accessible to people on foot.</p>

			<p>Through Policy T1 the GPNP sets out which routes need improving to encourage active modes of travel. These relate to the series of policies (Policy GI1-GI3) that involve the greening of strategic routes, linking key destinations through improved walkways and cycle paths, to help promote active travel options and ultimately the wellbeing of occupants.</p> <p>GPNP’s spatial strategy clearly marks sites for protection and those for development. Knowing the neighbourhood well, selection has been carefully made to make the most effective use of the land: it ensures the protection of parcels which have an intrinsic social and nature conservation value (Policy CA1-CA2 and GI1-GI5), while proposing the allocation of land parcels (brownfield land and sites not designated) for housing which will add value to the neighbourhood as a whole (Site Allocations: SA1, SA2, SA3, SA4, SA9, SA10).</p>
Social Sustainability	<ul style="list-style-type: none"> Provide Thriving Community Spaces <p>Related Aims</p> <ul style="list-style-type: none"> Create a Sustainable Healthy Environment Provide Quality & Affordable Homes Improve Sustainable Transport Provision 	<ul style="list-style-type: none"> Policy CA2: Safeguarding and Enhancement of Key Cultural Community Assets Policy CA3: Safeguarding Public Houses Policy CIL1: Allocation of CIL Funding Policy SA5: The Ringway Centre Policy SA6: The Grove Park Library Policy SA7: Grove Park Youth Club, Marvels Lane 	<p>To support strong, vibrant and healthy communities, the GPNP has promoted sites for development to ensure a sufficient number and range of homes can be provided to meet the needs of present and future generations.</p> <p>The GPNP also helps to foster a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support community health, social and cultural well-being, having identified key cultural destination sites, enterprise spaces and key linking routes that promote green infrastructure to improve active mobility through the neighbourhood. The policies seek to reverse the decline of social infrastructure provision and help improve the health, social and cultural wellbeing of everyone, no matter their background. These policies help address the wider determinants of health and prosperity in a neighbourhood.</p>
Environmental Sustainability	<ul style="list-style-type: none"> Create a Sustainable Healthy Environment 	<p>Policy SE1: Incorporation of Climate Adaptation Measures</p> <p>Policy SE2: Improving Air Quality</p> <p>Policy SE3: Alleviating Flood Risk</p>	<p>Protecting and enhancing Grove Park’s natural, cultural, built and historic environment is central to the GPNP. It sets out four key policy domains dealing with heritage, green infrastructure, biodiversity and the natural environment and the built environment. All contribute to</p>

	<ul style="list-style-type: none"> • Deliver Nature Areas and Urban National Park • Protect Grove Park's Heritage Assets • Achieve Quality in Built Environment 	<p>Policy GI1: Protection and Enhancement of Grove Park's Green Spaces Policy GI2: Delivering the Linear Parkland Nature Trail (Railway Children Urban National Park) Policy GI3: Designation of Nature Conservation Improvement Areas Policy GI4: Green Infrastructure-led Development Policy GI5: Protection of the Designated Dark Sky Status of Grove Park Nature Reserve</p> <p>Policy HR1: Conservation and Enhancement of Heritage Assets and Buildings of Townscape Merit Policy HR2: Protection of Areas of Special Local Character (ASLC) Policy HR3: Enhancement of Chinbrook Estate ASLC</p> <p>Policy BE1: Extensions and Alterations to Existing Buildings Policy BE2: Human-centric and Biophilic-led Design of New Development</p>	<p>making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy, with the goal of achieving biodiversity and environmental net-gain. Additionally the GPNP policies on Green Infrastructure (Policies GI1-G5) recognise the multiple functions of such spaces and are intrinsically linked with Sustainable and Healthy Environment Policies SE1-SE3.</p> <p>In terms of heritage, the GPNP has identified a number of non-designated heritage assets and areas of special local character, which are significant to the area of Grove Park, having lost many landmarks in the past. The policies also require new development to make a positive contribution to local character and distinctiveness that these assets afford.</p> <p>GPNP promotes the use of biophilic design guidelines that promote the visual harmony, environmental sustainability, climate adaptability as well as the creativity of design, to shape an environment that promotes not just the physical wellbeing but also mental wellbeing of its occupants. These policies are also compliant with the NPPF which promotes opportunities for the local community to 'shape the surroundings' in a manner that makes the neighbourhood thrive over the longer term, through a healthier, more liveable and climatically adapted environment.</p> <p>The GPNP seeks to protect its most valuable green spaces and sites of importance for nature conservation while identifying several sites for redevelopment on land that currently holds no intrinsic or nature conservation value – thereby promoting 'Good Growth' in the right places</p> <p>.</p> <p>The GPNP strategy and policies clearly map out everything that residents hold dear about their neighbourhood, highlighting all its</p>
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			<p>unique qualities which need to be protected, improved and enhanced.</p> <p>Grove Park's biggest asset is the 'countryside' feel of its Metropolitan Open Land and SINC along the railway embankment and seeks to capitalise on its intrinsic landscape character and beauty, by promoting it as a visitor destination that can help promote the wider future economic and cultural vitality of the area. Therefore the policies promote the multiple benefits of protecting its green spaces as not just spaces that contribute to biodiversity net-gain, but also offer healthy recreation opportunities for residents as well as be future destinations (i.e. its proposed Railway Children Urban National Park), that will also bring in visitors and potential spending to help the local economy.</p> <p>The GPNP takes full account of flood risk by not only acknowledging the need for design measures in alluvial flood risk zones, but also ensuring there is no net loss of permeable surfaces to reduce surface water flood risk, especially as Lewisham has suffered from these in the past.</p> <p>Environmental net-gain is promoted through Policies SE1-SE3 and policies that promote sustainable design (Policies BE1-BE2, GI1-GI4).</p>
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TABLE 3: HOW THE GPNP ACHIEVES SUSTAINABLE DEVELOPMENT

3 Conforming to National Policy (NPPF)

The National Planning Policy Framework (NPPF 2019)⁷ sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans (including both neighbourhood and local authority plans) for housing and other development can be produced.

3.1 Plan-making Process

In accordance with section 3 (NPPF 2019), The GPNP has had regard to the NPPF in the making of the plan, providing a positive, forward looking vision for the future of the Grove Park designated neighbourhood area and addresses the economic, social and environmental priorities facing Grove Park.

The process has empowered local people to shape the policies that will impact their surroundings, by setting out a practical framework for future sustainable development in the neighbourhood. The spatial strategy and corresponding key diagrams set out in the Grove Park Neighbourhood Development Plan map out where the opportunities for development are located and which key assets need to be conserved for future generations to enjoy. Residents have invested a lot of volunteered time carefully mapping these opportunities to ensure future planning application decisions will be effectively guided, based on both the aspirations of the communities living in Grove Park, as well as the data and evidence collected throughout the process.

The GPNP supports the strategic development needs set out in the London Plan and Lewisham Borough Council's Local Plan and promotes more housing and mix-used development than is currently set out in the Local Plan for the Grove Park neighbourhood area. It also sets out detailed policies on the necessary provision for community facilities, conservation and enhancement of the natural and built environment and overall promotes the wellbeing of the neighbourhood and its people.

The GPNP is shaped by many engagement events and correspondence (detailed in the Consultation Statement) with communities, local organisations, businesses, landowners and statutory consultees, and is underpinned by evidence as set out in Annex I & II and the supporting appendices⁸. The GPNP is prepared positively in a way that is aspirational, but deliverable in conjunction with wider strategic spatial

⁷ National Planning Policy Framework (NPPF), February 2019 - <http://planningguidance.communities.gov.uk/blog/policy/>

⁸ GPNP supporting evidence - <https://grovepark.org.uk/publications/>

development strategies for the area (including the new London Plan Policy SD10 Strategic and Local Regeneration).

3.2 Conformity with NPPF Policies

Table 4 outlines how the GPNP's objectives and policies conform to the following relevant sections of the NPPF (February 2019):

- 5. Delivering a sufficient supply of homes
- 6. Building a strong, competitive economy
- 7. Ensuring the vitality of town centres
- 8. Promoting healthy and safe communities
- 9. Promoting sustainable transport
- 11. Making effective use of land
- 12. Achieving well-designed places
- 14. Meeting the challenge of climate change, flooding and coastal change
- 15. Conserving and enhancing the natural environment
- 16. Conserving and enhancing the historic environment

	Policy Theme (GPNP Strategic Objective)	Conforms with NPPF Section	GPNP Policy	Compliance Statement
1	Protect Grove Park's Heritage	<ul style="list-style-type: none"> Section 16 (para 184 – 202) – Conserving and Enhancing the Historic Environment 	<ul style="list-style-type: none"> Policy HR1: Conservation and Enhancement of Heritage Assets and Buildings of Townscape Merit Policy HR2: Protection of Areas of Special Local Character (ASLC) Policy HR3: Enhancement of Chinbrook Estate ASLC 	<ul style="list-style-type: none"> In order for Grove Park to maintain an overall competitive advantage in its growth, its unique heritage qualities are protected, promoted and enhanced through Policies HR1-HR3, as well as those policies supporting Policy Objective 3 (addressing the built environment elements) and Policy Objectives 8 and 9 (addressing the natural heritage and environmental elements). Distinctiveness helps to achieve the sustainability of a neighbourhood and is often set by the area's natural, cultural and built heritage assets. Distinctiveness contributes to a sense of place, which can often impact the morale and perceived safety of an area, with ultimate consequences of perceived quality of life in an area. The GPNP seeks to achieve conservation of the historic environment and of these irreplaceable resources through: <ul style="list-style-type: none"> a) Recognising the heritage assets including buildings of townscape merit and areas of special character and ensuring development contributes to their conservation, enjoyment and enhancements (conforming to para 185) b) Enhancing the distinctive Chinbrook estate by ensuring development makes a positive contribution to the local character and distinctiveness of the estate, from a built-form and cultural perspective (conforming to para 185 c-d).
2	Renew Grove Park's Centre	<ul style="list-style-type: none"> Section 2 (para 23 – 27) – Ensuring the Vitality of Town Centres Section 5 (para 59 – 79) – Delivering a 	<ul style="list-style-type: none"> Policy NC1: Enhancement of Grove Park Local Neighbourhood Centre and Shopping Parades Policy NC2: Grove Park Neighbourhood Centre Regeneration Area 	<ul style="list-style-type: none"> Grove Park is not within easy reach (without vehicular transport) of surrounding shopping areas of all hierarchies and therefore, not serving the local shopping conveniences of the residents. Its neighbourhood centre is also run-down and in need of investment. Recognising that its centre is the heart of the community, the Policies NC1-NC2 seek to increase the viability and vitality of the centre and other shopping parades to support a stronger, competitive local economy and improved

Policy Theme (GPNP Strategic Objective)	Conforms with NPPF Section	GPNP Policy	Compliance Statement
	Sufficient Supply of Homes	<ul style="list-style-type: none"> • Policy SA3: Bus Waiting Area & Vacant Land at Rear • Policy SA4: Lewisham Adult Education Centre • Policy SA8: Land to rear of Baring Hall Hotel 	<p>neighbourhood environment (Conforming to para 85). It does this through:</p> <ul style="list-style-type: none"> a) Allocating the neighbourhood centre for redevelopment as a ‘Regeneration Area’ to accommodate some intensification to support the vitality of the centre (thereby conforming to Para 85 (f)). b) Promoting the need for a market space on the underused space at the rear of the Baring Hall Hotel (Policy SA8) to increase the service offer and provision of fresh food, and help meet its healthy neighbourhood policy aims, reducing the current over-dominance of fast food takeaways as well as increasing opportunities for enterprise. c) Encouraging shop front improvements and enhancements to make the town centre feel more like a destination. d) Allocating 6 sites for housing and mixed-use development, intensifying the sub-urban town centre to deliver new dwellings, including affordable homes bringing about potential greater footfall.
<p>3 Achieve Quality In The Built Environment</p>	<ul style="list-style-type: none"> • Section 7 (para 124 – 132) – Achieving Well-designed Places 	<ul style="list-style-type: none"> • Policy BE1: Extensions and Alterations to Existing Buildings • Policy BE2: Human-centric and Biophilic-led Design of New Development 	<ul style="list-style-type: none"> • Based on resident local knowledge and research undertaken, Grove Park has identified a number of buildings and features considered to be of unique heritage quality. Some have since been demolished or degraded over time and so the policies here seek to work in tandem with Policy Objective 1 to protect heritage assets of townscape merit, as well as promoting well-designed new development that are inclusive, safe and contributes to the wellbeing of inhabitants by virtue of its design qualities. Design is asked to respond to: <ul style="list-style-type: none"> a) Grove Park’s local distinctiveness by reinforcing and protecting the existing identified qualities in the built, natural and historic environment (see also Policy Objective 1).

Policy Theme (GPNP Strategic Objective)	Conforms with NPPF Section	GPNP Policy	Compliance Statement
			<ul style="list-style-type: none"> b) Guide innovation and creative originality of design by ensuring design is compatible with the design-led determinants of health (in terms of scale, detailing, massing, healthy use of materials) and with requirements to consider sustainability such as durability, lifespan and adaptability of design to meet needs of a changing climate and minimise waste and redundancy of development (conforming to para 127; para 131). c) Promote design that responds to evidenced designed qualities that help to create harmonious and healthy environments, with an emphasis on biophilic design – taking into account the area’s special qualities of the much-loved natural parkland landscape and heritage elements of design (conforming to para 125).
<p>4 Provide Thriving Community Spaces</p>	<ul style="list-style-type: none"> • Section 8 (para 91 – 101) – Promoting Healthy and Safe Communities 	<ul style="list-style-type: none"> • Policy CA1: Safeguarding and Enhancement of Key Cultural Community Assets • Policy CA2: Safeguarding of Public Houses 	<ul style="list-style-type: none"> • Currently Grove Park has a number of important community spaces which play a significant role in facilitating social interaction to support healthy, inclusive communities and help address wider issues like isolation, youth engagement and antisocial behaviour. The policies here ensure: <ul style="list-style-type: none"> a) The sustained provision of sufficient choice in community facilities to promote social interaction (conforming to para 91). b) That new development contributes to enhancing this provision by addressing the current poor quality in community buildings through development contributions. c) Guard against the unnecessary loss of valued community assets and facilities/services (conforming to para 92(c)). • Policies CA1-CA2 work in hand with GPNP Policy Objectives 8 and 9, which work together to deliver high quality open spaces along a network of green infrastructure and opportunities promote healthy lifestyles

	Policy Theme (GNP Strategic Objective)	Conforms with NPPF Section	GNP Policy	Compliance Statement
				through sport and recreation and social interaction in and around the identified community assets (conforming to para 91-92).
5	Provide Quality Homes	<ul style="list-style-type: none"> Section 5 (para 59 – 79) – Delivering a Sufficient Supply of Homes Section 11 – Making Effective Use of Land 	<ul style="list-style-type: none"> Policy H1: Delivering a Healthy Mix of Housing and Quality Design Policy H2: Promoting Affordable Local Ownership Policy H4: Windfall Sites 	<ul style="list-style-type: none"> The GNP provides for additional delivery of housing in the neighbourhood than is currently being planned. As such, it supports the Government’s objective to significantly boost the supply of homes. It does this through: <ul style="list-style-type: none"> a) Promoting mix of housing typologies, especially family housing as the identified need from community input (conforming to para 61; para 119). b) Promoting affordable housing, especially in estates like Chinbrook Estate which finds itself in the lowest 20% most deprived SOAs in the UK (conforming to para 61-63). c) Allocating 6 Sites for housing or mixed-use development of varying small to medium sized sites (conforming to para 67-69 – identifying land for homes) on land with no intrinsic value, while still recognising the beneficial wider ecosystem services offered by Sites of Importance for Nature Conservation which are currently under threat of destruction (conforming to para 118). d) Sets clear expectations for the quality of development along with linked GNP Policy BE2 (conforming to para 72(c)).
6	Create Enterprising Local Employment Opportunities	<ul style="list-style-type: none"> Section 6 (para 80 - 84) – Building a Strong, Competitive Economy Section 7 (para 85 – 90) – Ensuring the 	<ul style="list-style-type: none"> Policy EM1: Protect Micro-Enterprise Employment Sites Policy EM2: Conversion of Unused Garages To Promote Micro-Enterprise Policy NC1: Enhancement of Grove Park Local 	<ul style="list-style-type: none"> Grove Park currently does not have a very strong local economy. The neighbourhood centre provides an opportunity to revitalise the retail offer. Protecting the pockets of disparate self-employed micro sites could help safeguard this local offer in the longer-term, offering opportunities for local entrepreneurs. The proposed policies place a significant weight on supporting local economic growth, building on Grove Park’s strengths of micro-enterprise by:

Policy Theme (GPNP Strategic Objective)	Conforms with NPPF Section	GPNP Policy	Compliance Statement
	Vitality of Town Centres	Neighbourhood Centre and Shopping Parades <ul style="list-style-type: none"> • Policy NC2: Grove Park Neighbourhood Centre Regeneration Area. 	<ul style="list-style-type: none"> a) Making it easier for local jobs to be created and sustained by designating and enhancing existing micro-employment sites. Such sites are specifically targeting the rising demand in smaller business units to support SME businesses (i.e. creative industries) and self-employed individuals (i.e. those offering neighbourhood scale services) (Conforming to para 81) b) Provide the right type of employment space (given the observed demand) in the right places (making full use of existing availability of abandoned or in use garage spaces). c) Provide opportunities that are responsive to local needs, in terms of educational attainments and the scale of enterprises of existing workforce and as such provide a competitive edge especially in terms of attracting this type of employment sector into the area which has since been displaced in other areas that have lost smaller, affordable work spaces. • Renewal of the town centre would also provide an improved destination and community focal point, bringing in the much needed footfall to ensure its vitality (conforming to para 85(f)).
7	Improve Sustainable Transport Provision <ul style="list-style-type: none"> • Section 9 (para 102 – 111) – Promoting Sustainable Transport 	<ul style="list-style-type: none"> • Policy T1: Enhancement of Key Active Travel Routes • Policy T2: Promote the Use of Sustainable Vehicular Options 	<ul style="list-style-type: none"> • Grove Park grew with the arrival of Grove Park station. This transport node provides the basis for promoting improved public transport but additionally recognises that much more can be done to achieve greater levels of active modes of travel including walking, cycling and horse riding. This is intrinsically linked to the green infrastructure along the railway cutting dominating the landscape to form continuous green routes between open spaces and the town centre, offering opportunities to deliver connected green routes for active travel. Additionally, the edge of the neighbourhood area is the busy and polluted South Circular Road. The policies also seek to address cleaner

Policy Theme (GPNP Strategic Objective)	Conforms with NPPF Section	GPNP Policy	Compliance Statement
			<p>and sustainable forms of vehicular travel through the area. The GPNP policies seek to achieve sustainable transport by:</p> <ul style="list-style-type: none"> a) Ensuring proposals enhance the identified opportunities to promote walking, cycling and public transport alongside proposed development (conforming to para 102 (c); para 104 (c-d); para 108 (a-c)). b) Cleaner vehicular alternatives are integral to the design of schemes (conforming to para 102 (e); para 110 (e)).
<p>8 Deliver Connected Nature Areas and an Urban National Park</p>	<ul style="list-style-type: none"> • Section 15 (para 170 - 183) – Conserving and Enhancing the Natural Environment • Section 8 (para 91 – 101) – Promoting Healthy and Safe Communities 	<ul style="list-style-type: none"> • Policy G11: Protection and Enhancement of Grove Park’s Green Spaces • Policy G12: Delivering the Linear Natural Parkland Nature Trail (Railway Children Urban National Park) • Policy G13: Designation of Nature Conservation Improvement Areas • Policy G14: Green Infrastructure-led Development • Policy G15: Protection of the Designated Dark Sky Status of Grove Park Nature Reserve 	<ul style="list-style-type: none"> • The GPNP capitalises on the neighbourhood area’s biggest assets, its biodiverse natural habitats and open spaces. Currently disconnected, neglected and inaccessible in parts, the GPNP seeks to incorporate them into the neighbourhood’s wider green infrastructure, protecting and enhancing the valuable natural parkland landscape, ecological network and biodiversity they offer and recognising the multiple benefits of ecosystem services (and therefore also helping to meet Policy Objective 9). The GPNP seeks to achieve this by ensuring: <ul style="list-style-type: none"> a) Access to an ecological network of high quality open spaces and priority habitats for biodiversity and opportunities for recreation, especially through realising the vision for its ‘Railway Children Urban National Park’ (conforming to para 96-98; para 170; para 174). b) Contribution to biodiversity net-gain through conservation, restoration and enhancement of priority habitats and the ecological network of the proposed linked nature trail – ‘Railway Children Urban National Park’ (conforming to para 174).

Policy Theme (GPNP Strategic Objective)	Conforms with NPPF Section	GPNP Policy	Compliance Statement
			<ul style="list-style-type: none"> c) Protecting open space assets important to the local community by designating Local Green Spaces (conforming to para 99). d) new development does not impact or cause cumulative effects) of pollution on health, living conditions and the natural environment, particularly in relation to the impact of light pollution on the intrinsically dark landscape of the Grove Park nature reserve (conforming to para 180 (c))
<p>9</p> <p>Create a Sustainable Healthy Environment</p>	<ul style="list-style-type: none"> • Section 8 (para 91 – 101) – Promoting Healthy and Safe Communities • Section 14 (para 148 - – 108) – Meeting the Challenge of Climate Change, Flooding and Coastal Change. 	<ul style="list-style-type: none"> • Policy SE1: Incorporation of Climate Adaptation Measures • Policy SE2: Improving Air Quality • Policy SE3: Alleviating Flood Risk 	<ul style="list-style-type: none"> • The GPNP sets out policies that will help planning meet the national need to address radical reductions in emissions and provide future development that is adapted to the existing and changing climate so as to reduce environmental and social risk in future. • Policies SE1-SE3 not only address environmental sustainability and promote environmental net gain (conforming to para 118 (a)) but also social sustainability, in that they contribute to healthier environments and ultimately economic sustainability, by averting unnecessary spend addressing the impacts of climate change.

TABLE 4: CONFORMITY WITH NPPF (2019)

4 Conformity with Strategic Policies of the London Plan

4.1 Current London Plan (2011)

This section demonstrates that the GPNP is in general conformity with strategic planning policies of the London Plan (2016) (2011 version as amended)⁹. The London Plan is the statutory Spatial Development Strategy for Greater London prepared by the Mayor of London (“the Mayor”) in accordance with the Greater London Authority Act 1999 (as amended) (“the GLA Act”) and associated regulations. Policies at the local level must conform to these strategic London-wide policies.

The legislation requires the London Plan to include the Mayor’s general policies in respect of the development and use of land in Greater London and statements dealing with general spatial development aspects of his other strategies. The London Plan (2016) details the overarching development strategy for the whole of London. This version of the London Plan has defined ‘Opportunity and Intensification’ areas; Grove Park fall outside of these areas and therefore the strategic policies that apply to them.

The vision set out in the current London Plan (2011 – 2036) is that London should excel among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change. Achieving this vision will mean making sure London makes the most of the benefits of the energy, dynamism and diversity that characterise the city and its people; embraces change while promoting its heritage, neighbourhoods and identity; and values responsibility, compassion and citizenship. This high level, overarching vision is supported by six detailed objectives which embody the concept of sustainable development. Table 5 demonstrates how the GPNP conforms with the strategic objectives and therefore corresponding policies of the London Plan.

⁹ The London Plan (2016) (2011 version, as amended) - https://www.london.gov.uk/sites/default/files/the_london_plan_2016_jan_2017_fix.pdf

London Plan Principles	GPNP Conformity
<p>A city that meets the challenges of economic and population growth in ways that ensure a sustainable, good and improving quality of life and sufficient high quality homes and neighbourhoods for all Londoners and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes.</p>	<p>The GPNP seeks to:</p> <ul style="list-style-type: none"> • Accommodate new housing development including affordable housing through its Policies H1 – H4 and Site Allocations SA1-SA4; SA9-10. • Promote a strong independent local economy with the proposed renewal of the town centre through Policy NC3 as well as create an enterprise hub at the Grove Park Youth Club (SA7) and promote micro-enterprise that support Small and Medium Sized Enterprises (SMEs) through Policies EM1-EM2. • Address deprivation and build on creating a strong thriving community with improved quality of life through policies that look to protect and enhance community spaces and their offer (Policies CA1, SA5, SA6, SA7, SA8); policies that achieve environmental and biodiversity net-gain with outdoor recreational facilities to help promote active lifestyles (Policies G11-G15; T1; SE1-SE3); policies that promote a quality built environment to create a healthy well-designed place with a strong sense of place (Policy BE1; HR1-HR2; G14); and a policy that promotes the enhancements of the Chinbrook estate to address the highest deprivation rates in the neighbourhood area (Policy HE3).
<p>An internationally competitive and successful city with a strong and diverse economy and an entrepreneurial spirit that benefit all Londoners and all parts of London; a city which is at the leading edge of innovation and research and which is comfortable with – and makes the most of – its rich heritage and cultural resources.</p>	<p>The GPNP seeks to:</p> <ul style="list-style-type: none"> • Promote a strong independent local economy with the proposed renewal of the town centre through Policy NC3 as well as create an enterprise hub at the Grove Park Youth Club (SA7) and promote micro-enterprise that support Small and Medium Sized Enterprises (SMEs) through Policies EM1-EM2. • Protect and enhance the neighbourhood’s cultural, natural and built heritage assets through Policies HR1-HR3; CA1-CA2; G11-G15.
<p>A city of diverse, strong, secure and accessible neighbourhoods to which Londoners feel attached, which provide all of its residents, workers, visitors and students – whatever their origin, background, age or status – with opportunities to realise and express their potential and a high quality environment for individuals to enjoy, live together and thrive.</p>	<p>The GPNP seeks to:</p> <ul style="list-style-type: none"> • Create a strong, safe and inclusive neighbourhood where people of all ages will have access to good quality services, green spaces, leisure and cultural facilities as well as enterprising opportunities through Policies CA1-CA2; G11-G15; EM1-EM2). • Promote sustainable access to facilities through Policies T1-T2.
<p>A city that delights the senses and takes care over its buildings and streets,</p>	<p>The GPNP seeks to:</p>

<p>having the best of modern architecture while also making the most of London’s built heritage, and which makes the most of and extends its wealth of open and green spaces, natural environments and waterways, realising their potential for improving Londoners’ health, welfare and development.</p>	<ul style="list-style-type: none"> • Promote good quality development that creatively instils biophilic properties of good design while also protecting the much loved heritage architecture through Policies HR1-HR3 and BE2. • Promote and enhance the neighbourhood’s green infrastructure and natural heritage assets through Policies GI1-GI5.
<p>A city that becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.</p>	<p>The GPNP seeks to:</p> <ul style="list-style-type: none"> • Address issues of climate change adaptation and environmental net-gain through Policies SE1-SE3. • Enhance biodiversity to achieve net-gain by protecting valued green space, connecting ecological networks and designation of Nature Improvement Areas (Nature Recover Areas) through Policies GI1-GI5.
<p>A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system which actively encourages more walking and cycling.</p>	<p>The GPNP seeks to:</p> <ul style="list-style-type: none"> • Promote sustainable transport in order to reduce reliance on the moto-vehicle through Policies T1-T2, thereby encouraging active travel through the linked nature trail of the proposed Railway Children Urban National Park and streetscape improvements to encourage walking to linked sites of nature conservation importance and other key cultural destinations. • Create a strong, safe and inclusive neighbourhood where people of all ages will have access to good quality services, green spaces, leisure and cultural facilities as well as enterprising opportunities through policies (CA1-CA2; GI1-GI5; EM1-EM2)

TABLE 5: CONFORMITY WITH CURRENT LONDON PLAN (2016)

4.2 New London Plan (2017)

A draft new London Plan was published by the Mayor for consultation in December 2017. This plan is currently undergoing an examination in public (EiP). It is however considered a material consideration in planning decisions. For this reason a brief outline of how the GPNP conforms to it is also included below.

The new London Plan sets out overarching ‘Good Growth’ Policies under six policy areas which underpin the policies in the rest of the new London Plan. The emphasis is on planning well, for the right number of homes in the right places, and to improve the health and quality of life, to reduce inequalities, ensuring everyone benefits:

- **Policy GG1** Building strong and inclusive communities
- **Policy GG2** Making the best use of land
- **Policy GG3** Creating a healthy city

- **Policy GG4** Delivering the homes Londoners need
- **Policy GG5** Growing a good economy
- **Policy GG6** Increasing efficiency and resilience

The GPNP equality aligns with these ‘Good Growth’ aims and the supporting policies of the new London Plan, as outlined in Table 6. Table 6 does not cover every clause of the policies, but seeks to highlight the key aspects that directly relate to the specific conditions of Grove Park.

Additionally, the southern area of the Grove Park designated area is identified in the new London Plan as a **Strategic Area for Regeneration** (being in the 20% decile of deprived areas in the UK), that has the potential to promote inclusive growth that increases opportunity for all. Therefore, GPNP Policy NC2 directly aligns to new London Plan Policy SD10 Strategic and Local Regeneration.

New London Plan Overarching Good Growth Policies	GPNP Policy Alignment
Policy GG1 Building strong and inclusive communities	<p>In line with Policy GG1 (a) which seeks to “ensure that London continues to generate a wide range of economic and other opportunities” the GPNP recognises that micro-enterprise opportunities are key in local communities and are already evidence in the area. The GPNP policies EM1-EM2 seeks to recognise the need to cater for such employment endeavours to help small businesses to establish and flourish, so that everyone is able to benefit in a fairer and more equal city.</p> <p>In line with Policy GG1 (b) which seeks to provide “good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation” the GPNP seeks to safeguard and enhance the few community assets it has and values, and build on its cultural heritage through Policies CA1-CA2.</p> <p>In line with Policy GG1(d) which seeks to “promote the crucial role town centres have in the social, civic, cultural and economic lives” ... recognising their role in providing “important opportunities for face-to-face contact and social interaction” the GPNP equally recognises the importance of planning pro-social places and seeks to achieve this through its policies that look to reboot the town centre and safeguard key heritage assets, such as the Baring Hall public house and other key community assets through Policies HR1-HR2; NC1-NC2; CA1-CA2.</p>
Policy GG2 Making the best use of land	<p>In line with GG2 (c) which calls for an understanding of “what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London’s distinct and varied character” the extensive spatial analysis, local knowledge and community input that has shaped the GPNP does just this. It has identified land suitable for development (Polices H1; SA1-SA4, SA9-SA10) while highlighting areas which should be protected and enhanced to project</p>

New London Plan Overarching Good Growth Policies	GNPN Policy Alignment
	<p>the natural heritage assets of the neighbourhood (Policies G11-G15). In this way, its spatial strategy makes best use of land for development and optimises the key assets of the neighbourhood which need to be protected for longer-term environmental and social sustainability of the area.</p> <p>In line with GG2 (d), which seeks to “<i>protect London’s open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening</i>”, the GPNP has mapped out all its green infrastructure assets and the connectivity potential between them, promoting an ecological network of different habitats that offer multi-functional benefits for biodiversity and wildlife as well as recreational opportunities and wider ecosystem services (Policies G11-G15). Its key asset, the natural parkland landscape of the railway cutting, is also proposed as a continuous nature trail to deliver the vision for the ‘Railway Children Urban National Park’ (Policy G12) – drawing inspiration from the neighbourhoods cultural and natural heritage and history.</p> <p>The GPNP Policies T1-T2 align with GG2 (e) which promotes the planning of “<i>good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel</i>”.</p>
Policy GG3 Creating a healthy city	Health and wellbeing is an intrinsic theme and an embedded objective that runs throughout the GPNP. All policies domains are geared towards addressing the wider determinants of health in multi-faceted ways to deliver social wellbeing, environmental wellbeing and economic wellbeing. The GPNP promotes the inclusive and sustainable regeneration and development of the allocated sites.
Policy GG4 Delivering the homes Londoners need	The GPNP allocates 6 housing-led sites with the potential to deliver approx. 500 new dwellings – subject to a detailed masterplanning process (Policy SA1-SA4, SA9-SA10). It also emphasises the need for more affordable homes (Policy H2) and the need for a quality mix of different homes to cater for different stages of life (Policy H1).
Policy GG5 Growing a good economy	In line with Policy GG5 (c), which promotes planning for “ <i>sufficient employment and industrial space in the right locations to support economic development and regeneration</i> ” The GPNP recognises the growth of micro-enterprises in various locations in the neighbourhood and seeks to safeguard these spaces as key affordable start-up employment spaces through its Policies EM1-EM2.
Policy GG6 Increasing efficiency and resilience	In line with GG6 (b), which seeks to ensure “ <i>buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, and avoiding contributing to the urban heat island effect</i> ”, Policies SE1-SE3 in the GPNP promote the delivery of sustainable and healthy environments that are adapted to the changing climate, and thereby more resilient, future-proofing the investment of development.

TABLE 6: CONFORMITY WITH NEW LONDON PLAN (JULY 2018 VERSION WITH MINOR MODIFICATIONS)

5 Conformity with Local Development Plan

5.1 Lewisham Local Development Framework

The Lewisham Local Development Framework is the series of planning documents which collectively deliver the adopted planning strategy and policies for the London Borough of Lewisham (LBL); they include:

- **Core Strategy**¹⁰ (adopted in June 2011): establishes the Borough-wide spatial policy context.
- **Site Allocations**¹¹ (adopted in June 2013): identifies the locations and sites for specific types of development needed to implement the Core Strategy's vision.
- **Development Management Local Plan**¹² (adopted in November 2014): sets out policies for the management of development and determination of planning applications.

LBL have confirmed that their Local Plan is under review. A Reg 18 version will soon be released for consultation. The assessment here is carried out against the existing Local Plan.

5.2 Conformity Statement

The Grove Park Neighbourhood Development Plan is in general conformity with the strategic policies of Lewisham's Local Plan.

The neighbourhood is covered by the overarching Core Strategy Spatial Policy 5 - Areas of Stability and Managed Change. This means that it is not expected to have any major development opportunities, and that incremental changes should manage and enhance its qualities, including shopping opportunities, local employment opportunities, and improvements to the walking and cycling environment, in order to improve access to local services.

The GPNP suggests that potentially this designation is reviewed, in light of its NC2 Policy for the neighbourhood centre renewal and the new London Plan Policy SD10

¹⁰ Lewisham Core Strategy 2011- <https://lewisham.gov.uk/myservices/planning/policy/ldf/core-strategy>

¹¹ Site Allocation Plan 2013 - <https://lewisham.gov.uk/myservices/planning/policy/ldf/site-allocations>

¹² Development Management Local Plan 2014 - <https://lewisham.gov.uk/myservices/planning/policy/ldf/development-policies>

Strategic and local regeneration¹³. With the provision on its high street being dilapidated and lacking in variety, it wants to revitalise its neighbourhood centre into a hub in its own right to achieve an overall upgrade in urban quality and amenity.

Table 7 details how each of the GPNP policies conforms to Lewisham's strategic Local Plan policies.

¹³ London Plan (2017) - Policy SD10 Strategic and local regeneration - <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/chapter-2-spatial-development-patterns/policy-sd10-strategic-and>

Lewisham Policy	Relevant GPNP Policy	Compliance Statement
<ul style="list-style-type: none"> • Core Strategy Policy 1: Housing Provision, Mix And Affordability 	<ul style="list-style-type: none"> • Policy H1: Delivering a Healthy Mix of Housing and Quality Design • Policy H2: Promoting Affordable Local Ownership 	<ul style="list-style-type: none"> • The GPNP policies will apply to all areas in Grove Park that come forward as windfall sites, as well as the Site Allocations for housing and mixed use development to help deliver housing.
<ul style="list-style-type: none"> • Core Strategy Policy 3: Strategic Industrial Locations And Local Employment Locations • Core Strategy Policy 5: Other Employment Locations • DM Policy 16: Local Shopping Parades And Corner Shops 	<ul style="list-style-type: none"> • Policy EM1: Protect Micro-Enterprise Employment Sites • Policy EM2: Conversion of Unused Garages To Promote Micro-Enterprise 	<ul style="list-style-type: none"> • Grove Park does not have any Local Employment Locations (LEL) neither are there any sites of significant size to warrant an LEL designation. However, in line with GPNP’s strategic objective to strengthen local employment opportunities, it seeks to protect the smaller units/workshops scattered throughout the neighbourhood and promotes the redevelopment of disused/underused garages into enterprise workspaces, thus allocating them as micro-employment sites.
<ul style="list-style-type: none"> • Core Strategy Policy 6: Retail Hierarchy And Location Of Retail Development • DM Policy 15: Neighbourhood Local Centres • DM Policy 16: Local Shopping Parades And Corner Shops 	<ul style="list-style-type: none"> • Policy NC1: Enhancement of Grove Park Neighbourhood Centre and Shopping Parades • Policy NC2: Grove Park Neighbourhood Centre Regeneration Area 	<ul style="list-style-type: none"> • The retail parade along Baring Road around Grove Park station is currently designated a Local Neighbourhood Centre covered by Policy DM 15. • The GPNP seeks to protect and enhance the Neighbourhood Local Centre and retail parades to ensure access to local services and to create active community hubs that serve the needs of the community. • Site Allocation SA8 also promotes the use of underused space in the neighbourhood centre for market space, thereby improving local choice and increasing the retail offer.
<ul style="list-style-type: none"> • Core Strategy Policy 7: Climate Change And Adapting To The Effects 	<ul style="list-style-type: none"> • Policy SE1: Incorporation of Climate Adaptation Measures • Policy SE3: Alleviating Flood Risk 	<ul style="list-style-type: none"> • These GPNP policies align to and augment Core Strategic Policy 7, incorporating additional best practice guidance and evidence.
<ul style="list-style-type: none"> • Core Strategy Policy 8: Sustainable Design And Construction And Energy Efficiency 	<ul style="list-style-type: none"> • Policy SE1: Incorporation of Climate Adaptation Measures • Policy BE1: Extensions and Alterations to Existing Buildings • Policy BE2: Human-centric and Biophilic-led Design of New Development 	<ul style="list-style-type: none"> • GPNP policies on climate adaptation (Policy SE1) and design of new development (Policy BE2) align to Core Strategic Policy 8.

Lewisham Policy	Relevant GPNP Policy	Compliance Statement
<ul style="list-style-type: none"> • Core Strategy Policy 9: Improving Local Air Quality • DM 23 Air Quality 	<ul style="list-style-type: none"> • Policy SE2: Improving Air Quality 	<ul style="list-style-type: none"> • These GPNP policies further augment Core Strategic Policy 9, highlighting additional considerations in line with new guidance and evidence.
<ul style="list-style-type: none"> • Core Strategy Policy 10: Managing And Reducing The Risk Of Flooding • Core Strategy Policy 11: River And Waterways Network 	<ul style="list-style-type: none"> • Policy SE3: Alleviating Flood Risk 	<ul style="list-style-type: none"> • The GPNP policies are in general conformity with this Core Strategic Policy 10. • Lewisham’s policy specifically relates to the River Thames, and the River Ravensbourne Network (and it’s assumed that the Quaggy, being a tributary, is part of this network). GPNP policies provide further detail about the treatment of the Quaggy river in relation to its water quality, landscape, biodiversity and its amenity value and opportunities to naturalise it in identified locations.
<ul style="list-style-type: none"> • Core Strategy Policy 12: Open Space And Environmental Assets • DM Policy 25: Landscaping and Trees 	<ul style="list-style-type: none"> • Policy GI1: Protection and Enhancement of Grove Park’s Green Spaces • Policy GI2: Delivering the Linear Natural Parkland Nature Trail (Railway Children Urban National Park) • Policy GI3: Designation of Nature Conservation Improvement Areas • Policy GI4: Green Infrastructure-led Development • Policy GI5: Protection of the Designated Dark Sky Status of Grove Park Nature Reserve 	<ul style="list-style-type: none"> • GPNP’s policies on the natural environment as well as those related to Green Infrastructure-Led approach to public realm design (Policies G1-G5) further augment Core Strategy Policy 12, highlighting the specific neighbourhood environmental assets not currently detailed in the Local Plan.
<ul style="list-style-type: none"> • Core Strategy Policy 14: Sustainable Movement and Transport 	<ul style="list-style-type: none"> • Policy T1: Enhancement of Key Active Travel Routes • Policy T2: Promote the Use of Sustainable Vehicular Options 	<ul style="list-style-type: none"> • The sustainable transport policies conform to Core Strategy 14 in highlighting the specific instances where issues like access and safety need to be addressed in Grove Park.
<ul style="list-style-type: none"> • Core Strategy Policy 15: High Quality Design For Lewisham • DM Policy 30: Urban Design and Local Character. 	<ul style="list-style-type: none"> • Policy BE1 - Extensions and Alterations to Existing Buildings 	<ul style="list-style-type: none"> • The built environment policies (Policies BE1-BE2) of the GPNP further raise the need for high quality design, further elaborating how high quality can be delivered to address health and wellbeing

Lewisham Policy	Relevant GPNP Policy	Compliance Statement
<ul style="list-style-type: none"> • DM Policy 31: Alterations and Extensions To Existing Buildings Including Residential Extensions • DM Policy 33: Infill Sites, Backland Gardens and Amenity Areas 	<ul style="list-style-type: none"> • Policy BE2: Human-centric and Biophilic-led Design of New Development 	<p>of inhabitants, climate adaptability and environmental sustainability.</p>
<ul style="list-style-type: none"> • Core Strategy Policy 16: Conservation Areas, Heritage Assets And The Historic Environment • DM Policy 37: Non-Designated Heritage Assets Including Locally Listed Buildings, Areas Of Special Local Character 	<ul style="list-style-type: none"> • Policy HR1: Conservation and Enhancement of Heritage Assets and Buildings of Townscape Merit • Policy HR2: Conservation of Areas of Special Local Character (ASLC) • Policy HR3: Enhancement of Chinbrook Estate ASLC 	<ul style="list-style-type: none"> • The GPNP localises the Core Strategy Policy 16 on heritage protection and enhancement, by identifying more specifically those areas and assets which the residents find unique to the neighbourhood, contributing to the ‘sense of place’ for Grove Park.
<ul style="list-style-type: none"> • Core Strategy Policy 19: Provision And Maintenance Of Community And Recreational Facilities 	<ul style="list-style-type: none"> • Policy CA1: Safeguarding and Enhancement of Key Cultural Community Assets • Policy CA2: Safeguarding of Public Houses 	<ul style="list-style-type: none"> • The GPNP further localises and augments Core Strategy Policy 19, by identifying those assets and community spaces that are deemed valuable and important to the local community.
<ul style="list-style-type: none"> • Core Strategy Policy 20: Delivering Educational Achievements, Healthcare Provision and Promoting Healthy Lifestyles 	<ul style="list-style-type: none"> • Policy GI3: Designation of Nature Conservation Improvement Areas • Policy GI4: Green Infrastructure-led Development • Policy T1: Enhancement of Key Active Travel Routes • Policy T2: Promote the Use of Sustainable Vehicular Options • Policy CA1 - Safeguarding and Enhancement of Key Cultural Community Assets • Policy SE2 – Improving Air Quality • Policy SE3 – Alleviating Flood Risk 	<ul style="list-style-type: none"> • These GPNP policies help to deliver opportunities for healthy and active lifestyles (by addressing the wider determinants of health), and help to protect the community spaces which actually deliver these services currently.

TABLE 7: CONFORMITY WITH LEWISHAM LOCAL DEVELOPMENT FRAMEWORK

6 EU Obligations

6.1 Human Rights and Equality and Inclusion Statement

The Grove Park Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act. Considerable emphasis has been placed throughout the consultation process on ensuring that it has reached all communities living and working in Grove Park, with no intentional isolation or exclusion from participating.

6.2 Strategic Environmental Assessment

This SEA Screening Statement has been prepared in relation to the Grove Park Neighbourhood Plan by AECOM in June 2018¹⁴.

The purpose of the Screening Statement is to set out a screening opinion in relation to whether a Strategic Environmental Assessment (SEA) process is required to accompany the development of the Grove Park Neighbourhood Plan (GPNP). The Screening Statement has been provided to the statutory consultation bodies for SEA (Historic England, the Environment Agency and Natural England) for their opinion. SEA is a systematic process undertaken to evaluate the likely significant environmental effects of development plans.

The requirement for SEA in England was introduced in 2004 through the Environmental Assessment of Plans and Programmes Regulation 2004 ('The SEA Regulations'), which transposed the European SEA Directive (2001/42/EC).

One of the 'Basic Conditions' that a Neighbourhood Plan is tested against is whether the making of a neighbourhood plan is compatible with European Union obligations, including obligations under the SEA Directive. Neighbourhood plans only require a full SEA where they are likely to lead to significant environmental effects.

Having screened the GPNP against Annex 2 of the SEA Directive, it was found not to need an SEA process. Table 8 below summarises the screening assessment. The full SEA Screening report can be found online¹⁴.

¹⁴ Strategic Environmental Assessment Screening Statement: Grove Park Neighbourhood Plan. Prepared by Aecom June 2018 (under the technical support offer).

SEA Topic	Summary Conclusions
Biodiversity, flora and fauna	<ul style="list-style-type: none"> • No sensitive annex 1 biodiversity areas. • Biodiversity significant areas found, but proposed allocations not deemed to affect the ecological value of these SINCS. • A key facet of the evolving plan is the enhancement of green infrastructure networks in the GPNP area. This will help limit effects on biodiversity and support biodiversity improvements. In light of this evidence, effects on biodiversity are unlikely to be significant.
Population and human health	<ul style="list-style-type: none"> • The GPNP sets out a range of policies which have an explicit focus on improving the quality of life of residents, including improving the public realm, for accessibility to services and facilities, and improving accessibility via active transport modes. Whilst the benefits which arise for residents from a well-designed Neighbourhood Plan have the potential to be wide-ranging, these are not deemed to be significant with regards to the SEA Directive and its requirements.
Soil	<ul style="list-style-type: none"> • The GPNP area is situated in the built up area of Greater London. As such, there are no areas of the best and most versatile agricultural land present within the GPNP area. Furthermore, only one of the ten site allocations is located on previously undeveloped land. As such, the effect on soil resources is deemed to be insignificant with regards to the SEA Directive and its requirements.
Water	<ul style="list-style-type: none"> • Development arising as a result of the GPNP may lead to an increase in the population of the GPNP area and create an associated increase in water demand. However, in the context of water management within London, the wider population pressures on London, and with regard to the SEA Directive and its requirements, the effect on water resources is deemed to be insignificant.
Air	<ul style="list-style-type: none"> • The GPNP area is not located within one of the wider borough's six Air Quality Management Areas, and in terms of the context of Lewisham and Greater London, any increase in congestion – or alternatively - improvements to traffic flow created by the GPNP, are unlikely to be significant. Therefore, with regard to the SEA Directive and its requirements on the effect on air is deemed to be insignificant.
Climatic factors	<ul style="list-style-type: none"> • In terms of climate change mitigation, the vision and objectives of the plan actively seek to encourage sustainable modes of transport and discourage private car use. This will help limit potential increases in greenhouse gas emissions from transport that may arise as a result of the plan. • Furthermore, the plan contains policies aimed to encourage climate change adaptation; whilst the proposed areas of development are not within Flood Zone 3, statutory requirements (including the requirements of the NPPF) will ensure that flood risk is addressed through new development proposals. • Both climate change mitigation and adaptation will be also supported by the GPNP's focus on enhancing green infrastructure and biodiversity. Given the size of the GPNP area in the context of Lewisham and Greater London, the nature and magnitude of these effects are unlikely to be significant with regard to the SEA Directive.
Material assets	<ul style="list-style-type: none"> • The Neighbourhood Plan may lead to small increases in the GPNP area's waste management requirements. No mineral sites are likely to be affected as a result of the GPNP. Potential increases in waste as a result of the GPNP

SEA Topic	Summary Conclusions
	are likely to be limited. Effects are likely to be further limited by statutory requirements regarding waste management. Due to their limited magnitude, effects are therefore unlikely to be significant in the context of the SEA Directive
Cultural heritage	<ul style="list-style-type: none"> • No historic environment assets in the GPNP area are deemed as 'sensitive areas' by the NPPG. • There are however two Grade II listed buildings within the GPNP area and a Grade II listed Registered Park and Garden. • There are also a limited number of locally listed structures. Due to their location and lack of proximity, none of the sites considered for potential allocations by the Neighbourhood Plan have the potential to affect the fabric and/or setting of these heritage assets. • Regeneration, renewal and intensification of the town centre promoted by the Neighbourhood Plan is also unlikely to significantly affect these assets. • More broadly, negative effects on the historic environment are likely to be limited by the GPNP's focus on protecting heritage assets and enhancing the townscape of the area. Therefore, negative effects are unlikely to be significant in the context of the SEA Directive.
Landscape / townscape	<ul style="list-style-type: none"> • Although the development of the proposed sites has the potential to affect the townscape character of the GPNP area (both positively and negatively), there are no townscape designations located within the GPNP area. • Furthermore, development may not necessarily be harmful to the townscape character of the GPNP area and may contribute positively overall to it. The GPNP also has a focus on conserving and enhancing heritage assets which contribute positively towards the townscape. This will help to minimise any negative effects of development. Therefore, effects are unlikely to be significant in the context of the SEA Directive.

TABLE 8: SUMMARY OF SCREENING ASSESSMENT

The screening report concludes:

- The lack of sensitivity of the Neighbourhood Plan area in relation to key SEA Directive environmental considerations.
- The local environmental constraints present in the Neighbourhood Plan area are not in proximity to the proposed allocation sites.
- The GPNP's vision and objectives and emerging policies is to limit potential environmental effects and to bring benefits for quality of life of the Neighbourhood Plan area's residents.

For these reasons, it is considered that the GPNP is not subject to the requirements of Directive 2001/42/EC, the 'SEA Directive' and associated regulations. As such, an SEA process meeting the requirements of the SEA Regulations is not deemed to be required to accompany the development of the GPNP. All statutory consultees were in agreement with the assessment (a copy of which are appended to the SEA report).

6.3 Habitat Regulations Assessment

A Habitat Regulation Assessment (HRA) Screening Report has been prepared by London Borough of Lewisham (LBL) in January 2019 in order to assess whether the proposed GPNP would likely have a negative effect on protected European sites (habitats and species) listed in the annexes of the Directive.

The requirement to assess plans or projects is outlined in Article 6(3) and (4) of the European Communities (1992) Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as the 'Habitats Directive'). The Habitats Directive established a Europe-wide network of sites known as Natura 2000, which provides for the protection of sites that are of exceptional importance for rare, endangered or vulnerable natural habitats and species within the European Union. The Habitats Directive is now consolidated in law within the Conservation of Habitats and Species Regulations (2017)¹⁵.

The HRA screening has concluded that there are no impacts on any European Sites as there are no European Sites within the borough and development proposals on those identified within the 15km of the borough boundary, for the purposes of screening, have not been found to have likely significant effects.

7 Conclusion

The Grove Park Neighbourhood Plan has been produced by the Grove Park Neighbourhood Forum through consultations with the local community over a number of years. The aims and policies of the GPNP set out to address the key issues and priorities identified by the community in the neighbourhood area. The GPNP has also identified a number of key new development opportunities to improve the neighbourhood as a whole and contribute to the achievement of sustainable development.

The policies have been drafted taking into account national, regional and local planning policies are considered to be in conformity with these policies. The Strategic Environmental Assessment indicates that the GPNP will have a significant positive effect on the area. The GPNF therefore, consider the GPNP to be in conformity with the relevant regulations and prescribed conditions and can be approved accordingly.

¹⁵ Conservation of Habitats and Species Regulations (2017)
<http://www.legislation.gov.uk/ukxi/2017/1012/contents/made>

GROVE PARK NEIGHBOURHOOD FORUM

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