Full Name: Mr Leonardo Francolini

Organisation Beaulieu Avenue and Longton Grove Residents Association (BALGRA)

Number: Core Strategy Policy Title: Sustainable movement and transport

14

Legal Compliance: Soundness: No

Reasons for Unsoundness: (1) Justified (2) Effective

Reasons for Non-Compliance:

Our association was not made aware of the consultation process until hours before the deadline. Consequently, we have not had time to gather evidence, but intend to do so. At this juncture, we can give quick, immediate comments. Core strategy policy. CSP 14 Sustainable movement and transport paragraph 1. "The access and safety of pedestrians and cyclists throughout the borough will be promoted and prioritised." On grounds of effectiveness: The core planning document fails to specify the means by which policy 1 will be met. What measures does the council intend to take? Our organisation has evidence of widespread resident opposition to the types of changes proposed for Sydenham Road, which may fall under measures implemented as part of section 1. This is evidence we can bring to the hearings, and that the council have copies of. Without a definition of the proposed methods to achieve this goal, we cannot have a discussion about the impact this policy will likely have on local residents, or the acceptability to local residents of measures potentially implemented by the council to achieve paragraph 1. Core strategy policy. Sustainable movement and transport paragraph 3 It could be implied from this paragraph that the council may institute policies to reduce car parking facilities to the point that residents are in competition with each other for fewer parking spaces than are required. We have evidence that residents do not want the council to reduce the number of parking spaces available. Core strategy policy. CSP 14 Sustainable movement and transport paragraph 4. Paragraph 4 could be construed to create a situation where residents in the vicinity of new developments will have controlled parking zones imposed upon them, and that the total pool of available parking will as a result of the policies contained in the core strategy fall short of demand. The council must not impose such policies without proper consultation and being up-front with local residents regarding their intentions. Car-free development would strongly negatively impact the quality of life for residents of the areas where developments are planned. Car-free new developments would also discriminate against the sick, disabled, elderly, infirm, those people not close to public transport links, and against people who need vehicles for their livelihoods. Core strategy policy 14 fails to recognise the value of roads to the economy, health and the quality of life for people in the borough. It is true that roads have dangers, but it is also true that they save lives. Without an effective network of roads in the borough, critically ill patients could not be reached in time for life-saving care, or be taken to hospital in a timely manner. Without an adequate road system, police and firemen could not do their duties effectively. The potholes in the roads throughout the borough due to lack of maintenance make use of a bicycle extremely hazardous.

Suggested Changes:

Core strategy policy. CSP 14 Sustainable movement and transport paragraph 1. Without a definition of the required actions by Lewisham council, and without consultation with residents groups who have been active regarding the potential impact the policy could imply, paragraph 1 should be struck from the document. Given the lack of definition and clarity, the paragraph is not effective. Given the lack of consultation, potential actions by the council to implement paragraph 1 would not be justified. Core strategy policy. CSP 14 Sustainable movement and transport paragraph 3. Given that the paragraph fails to state the means of achieving this policy objective, and given we have evidence that the potential methods to achieve these objectives are not wanted by residents, and given the lack of means being stated that there has been no consultation on the means, the paragraph should be deleted, or re-worded to make clear that resident's parking will not be reduced to a point of shortage. Given the lack of clarity, it fails on deliverability, and justification through lack of consultation. Core strategy policy. CSP 14 Sustainable movement and transport paragraph 4. For many people, and for those in the suburban areas of Lewisham, car-free development would not be a suitable or acceptable option. For some of the most vulnerable people in our society who depend on visitors, or the use of their own car, this policy will be very damaging. Some areas of the borough are 25 minutes walk from the closest train station, and are not well serviced by public transport. Paragraph 4 should be deleted in it's entirety and replaced with: "The road system provides for prosperity and well-being of residents in the borough. The utility of roads should be enhanced to improve opportunities, quality of life and accessibility for residents and businesses". The existing paragraph 4 fails on justification. We have evidence of widespread resident opposition to such plans.

Attend Oral Exam:

Yes, I wish to participate at the oral examination

Reasons for Attendance: To bring evidence of BALGRA's work and findings from our residents surveys, and to respond to any specific

Attendance: questions.

Other Comments:

Number: Spatial Policy 3

Title: District Hubs

ID:

2

ID:

3

Legal Compliance:

Soundness: No

Reasons for Unsoundness:

(1) Justified (2) Effective

Reasons for Non-Compliance:

Note: As detailed in a previous submission, BALGRA was not informed of, or involved in the core strategy consultation process. This response has been put together in the closing hours of the consultation for the core document proposed submission version. Please take this into consideration when appraising our submission. Spatial policy three, subheading Sydenham, subsection i. States "Support physical and environmental improvements to Sydenham High Street.". The road recognised as a high street is actually Sydenham Road. The council proposed a series of changes to Sydenham Road which have been widely rejected by residents. Given this change is not defined, the element of the policy is not deliverable and is therefore not effective. Furthermore, plans which had been drawn up are not considered as improvements by residents and has been clearly objected to by residents and local businesses in the consultation on the road scheme. Therefore, if this applies to existing plans, it is not justified. this section should be struck from the core strategy.

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Suggested Changes: Define improvements in the context of resident's feedback, or strike entry from spatial policy 3.

Attend Oral Exam: Yes, I wish to participate at the oral examination

Reasons for Attendance:

To provide any evidence as required and answer any questions arising.

Other Comments:

Number: 1.22 Title: Paragraph ID: 1

Legal Compliance: Soundness: No

Reasons for Unsoundness: (1) Justified

Reasons for Non-Compliance: Beaulieu Avenue and Longton Grove residents association has been an active voice of residents since early 2005. We have made numerous submissions to Lewisham council on a broad range of issues. For example, a proposed controlled parking zone in the area, road traffic cameras, road humps, narrowing of Sydenham Road. We have collected and delivered evidence to Lewisham demonstrating the wishes of local residents in the form of petitions, and individual written letters. We have been active in local fora. Despite being an active organisation representing the views of residents, we were not aware of the ramifications of the Core Strategy until 9:32pm on 5th April. The cut-off time for responses being 5pm on 6th April. We were not informed of the impact of the core strategy by Lewisham council. Or awareness of the core strategy comes from a member of another resident's association. That association was also unaware of the ramifications, import and wide ranging powers conferred in the core strategy until very recently. We don't believe the core strategy as it stands can represent the wishes of the residents in Sydenham, given the lack of consultation and dissemination of knowledge regarding the ramifications. I am not aware of ever having seen the "core strategy proposed submission version", although I have recently been told about it. I don't believe any other committee member has seen, or at least has been made aware of the fact it guides Lewisham's planning for the next 15 years and contains policies which directly link in with issues we have been giving residents voice about. Given that the main document itself is 190 pages long, which cross references with the London plan, and several other supporting documents and maps, we would need months to put a full response to the core document.

Suggested Changes:

We would ideally like the core document to go back to the drawing board, with all local resident's associations made cognisant of the existence of, and ramifications of the core strategy so that their views can shape the

policies contained within it.

Attend Oral Exam: Yes, I wish to participate at the oral examination

Reasons for Attendance: We may use the time between now and the meeting to collect data and evidence regarding the lack of

consultation.

Other Comments: