



carneyp@signetplanning.com 6 April 2010

FREEPOST RRZZ TLHU GKZS Planning Service London Borough of Lewisham 5th Floor, Laurence House 1 Catford Road London SE6 4RW

**Dear Sirs** 

#### LONDON BOROUGH OF LEWISHAM: LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY – PROPOSED SUBMISSION VERSION 2010 REPRESENTATIONS ON BEHALF OF RENEWAL

Please find enclosed representations to the London Borough of Lewisham Local Development Framework Core Strategy (Proposed Submission Version) on behalf of Renewal.

We enclose a form for each representation together with a paper setting out the substance of each representation.

I trust that everything is in order, however, if you have any queries at all, please don't hesitate to contact me.

Yours faithfully for Signet Planning

Director

Enc

cc Mark Taylor, Renewal

## LEWISHAM LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY – PROPOSED SUBMISSION VERSION FEBRUARY 2010

#### **RESPONSE BY SIGNET PLANNING ON BEHALF OF RENEWAL**

#### INTRODUCTION

The Lewisham LDF Core Strategy allocates the Surrey Canal Triangle for significant mixed use development. It is identified in the Core Strategy as Strategic Site Allocation 3.

Renewal owns the majority of the allocated land and as such, Renewal can ensure delivery of the Lewisham Vision for the land which is to deliver a significant amount of the regeneration, employment and new homes which are required in the Borough, as set down in Spatial Policy 2.

In accordance with the advice in Planning Policy Statement 12 (PPS12), Renewal has worked closely with Lewisham over the course of the last few years with regard to the exciting vision for the site and also in relation to ensuring its delivery. Thus, we can unequivocally state that Renewal is supportive of the identification of Surrey Canal Triangle as a Strategic Site for mixed use development in the LDF Core Strategy.

Renewal is largely happy with the policies in the Core Strategy, however, there are a few areas where Renewal does have concerns and these are set down below.

#### Figure 6.1 Key Diagram

The Deptford Creek/Riverside Opportunity Area identified in the London Plan is shown on the Core Strategy Key Diagram at Figure 6.1. However, the second Opportunity Area in the London Plan within the London Borough of Lewisham, namely the Lewisham/Catford/New Cross Opportunity Area, is not identified on the Key Diagram. The Lewisham Regeneration and Growth Areas have a strong relationship to both Opportunity Areas and therefore both should be identified on the Key Diagram for clarity.

#### Paragraphs 6.24 – 6.34 Defining Mixed Use Employment Locations (MELs)

Renewal is supportive of the definition of the MELs and the major regeneration benefits for the north of the Borough that they will bring. Renewal is particularly supportive of the objectives set out in the bullet points at paragraph 6.34 of the Core Strategy which include making the best use of available land, attracting investment to the area, addressing severance issues and providing a 'sense of place'.

In paragraphs 6.24 - 6.34 there is reference to the accommodation of new quality premises to attract new firms and businesses. This is supported.

However, it is considered that it should be acknowledged in these paragraphs that employment growth in this area is likely to come from a wide range of sectors from creative industries and offices, training establishments, sports businesses and so on. This wider mix of future employment not only strengthens Lewisham position in more growth-oriented sectors, but also better matches the mix of employment sought by residents.

It is considered that this variety of need and demand should be referred to in paragraphs 6.24 - 6.34. In addition, paragraph 6.32 oversimplifies the position in saying that the identified growth sectors "do not accord with typical office type uses". In reality these and other growth sectors are likely to be seeking a much more mixed type of accommodation, and many are not particularly suited to traditional industrial accommodation, some will be more suited to office space or to intermediate forms of work space.

#### Paragraphs 6.45 – 6.48 Climate Change

Within Paragraphs 6.47 and 6.48 of the Core Strategy there is reference to the vision to extract surplus heat from SELCHP to serve the new large development sites in North Lewisham.

PPS12 advises that there should be clarity on the delivery of infrastructure, but whilst Renewal is fully supportive of the vision with regard to SELCHP, clarity on delivery, and the responsibilities for delivery, is not fully provided at paragraphs 6.47 and 6.48. It is considered that these paragraphs would benefit from some re-wording in this regard.

#### Paragraphs 6.50 Climate Change and Related Paragraphs 6.97, 6.122 and 6.156

In paragraph 6.50 of the Core Strategy (and related paragraphs as above), there is a reference that housing will need to be designed and constructed in accordance with the Code for Sustainable Homes Code Level 6 (zero carbon) by 2016 and that this will be in accordance with Government regulations. This is not correct. Whilst changes to Part L of the Building Regulations are under way (making improvements on the carbon emission performance of dwellings) and whilst the industry is committed to zero carbon by 2016, this does not equate to a requirement to achieve Code Level 6. It is considered that paragraph 6.50 should be amended in this regard. Also, the Building Regulations only affect those properties where construction commences following the introduction of Part L changes. Where commencement of the construction of properties commences prior to the introduction of the Part L changes, there is no requirement to comply with the changes, even where construction is completed after the date of the changes. Furthermore, the Building Regulation changes are likely to be in October of each respective year, rather than April. Amendments also need to be made to the Core Strategy in this regard.

#### Paragraph 6.57 Open Space and Environmental Assets

Renewal is supportive of the enhancement of Bridge House Meadows, adjacent to the MEL at Surrey Canal Road, to provide an adequate open space resource in the area. However, it should be acknowledged that Transport for London is utilising Bridge House Meadows for the construction of the extension of the East London Line and enhancement works can only commence once these works have been completed. It is also considered that there should be an acknowledgement as to how the enhancement works are to be delivered.

#### Paragraph 6.74 Protect and Enhance Lewisham's Character

Renewal is supportive of the location of tall buildings within the Strategic Site Allocations to mark the scope and scale of regeneration that the policies in the Core Strategy will deliver. However, further clarity on the evidence base to support paragraph 6.74 and Policy 18 would be helpful.

#### Core Strategy Policy 1 Housing and Table 7.1

At Point 4 of this policy, there is reference to a 70% social rented/30% intermediate affordable housing component. However, Table 7.1, which sets out a preferred housing mix for the affordable housing, does not appear to correspond to this 70%/30% split. Amendments are therefore sought to this policy for clarification.

#### Core Strategy Policy 4 Mixed Use Employment Locations

Renewal is supportive of this policy. However, the policy does state that the MELs should provide employment uses within the B use class amounting to at least 20% of the built floor space of any development as appropriate to the site in its wider context. As referred to above, the market sectors in which employment growth is to occur in Lewisham and across the Strategic Site Allocations is broad. It is not just within the B use classes where employment is expected to be delivered. Other market sectors include training establishments, the health sector and in centres of sporting excellence. It is therefore considered that Core Strategy Policy 4 should be altered to reflect this, facilitating a greater diversification and strengthening of the local economy

It is also considered that an additional bullet point should be added to this policy: Core Strategy Policy 4, 1. v. "mitigation, where appropriate, of impacts on physical, social and green infrastructure".

#### Core Strategy Policy 8

As already referred to above, it is considered that there is some confusion within the Core Strategy with regard to what is required by Government regulations and through changes to the Building Regulations, particularly in relation to carbon emissions. There is no requirement for private sector housing to achieve Code for Sustainable Homes Levels 4, 5 and 6 and thus it is considered that the wording of the policy should be amended.

Also, the policy states that development will be required to meet at least 20% of the total energy demand through on-site renewable energy. This is not in accordance with the current direction of regional planning which is to focus on CHP as much as possible and then look to on-site renewable energy second. In the majority of cases achieving 20% of total energy demand through on-site renewable energy is not practicable or deliverable. This part of the policy should therefore be amended.

#### Core Strategy Policy 14 Sustainable Movement and Transport

Core Strategy Policies 12 and 13 address the mitigation of development. However, Core Strategy Policy 14 does not deal with this in quite the same way. It is considered that text should be added to Core Strategy Policy 14: "9. The Council will work with its partners to ensure the delivery of necessary transport infrastructure", and "10. Planning obligations will be sought to ensure the implementation of this policy where appropriate".

#### Core Strategy Policy 18 the Location and Design of Tall Buildings

We are supportive of the direction of this policy, however, it is considered that the Core Strategy would benefit from further clarity in relation to the evidence base.

#### <u>Core Strategy Policy 19 Provision and Maintenance of Community and Recreational</u> <u>Facilities</u>

This policy commits the Council to work with partners to ensure delivery of community and recreational infrastructure, informed by the Infrastructure Delivery Plan. It is considered that this policy should also make clear that the Council will ensure development mitigates its impacts.

#### <u>Core Strategy Policy 20 Delivering Education Achievements, Health Care Provision</u> and Promoting Healthy Lifestyles

Renewal is supportive of this policy; however, it is also considered that the need for sporting facilities in the area should be acknowledged in this policy too.

Renewal, Sport England and Lewisham recently commissioned Neil Allen Associates to undertake a sports needs and demand survey for the North Lewisham area. The report has now been finished and is to be formally presented on 13<sup>th</sup> April 2010. The report highlights deficiencies in sporting participation and facilities in this area and concludes that there is strong need for sporting facilities in this area.

It identifies that there is a demand for a regional centre for sport in this location to provide facilities for basketball, netball, football, cricket, boxing, weightlifting, indoor athletics as well as badminton, table tennis, volleyball and indoor softball/baseball.

Also, this policy states that the Council will ensure the health impacts of development are identified and addressed at an early stage in the planning process. As this policy also covers education, text should also be added to state that the impacts of development on education are also identified and addressed at an early stage in the planning process.

#### Strategic Site Allocation 1 Requirements for Strategic Site Allocations

Renewal is supportive of the significant majority of this policy.

However, we object to point 2 of the policy which states that if an applicant submits an outline planning application for a Strategic Site Allocation, then this should be accompanied by a full planning application for Phase 1. It is considered that this is an inappropriate comment for a Core Strategy overarching policy for each strategic site allocation which all have individual characteristics and issues. It is also considered that there is no basis for such a requirement and there is no evidence base to support such a requirement. Therefore, this requirement should be deleted.

The comment within Strategic Site Allocation 1 that the masterplan for each allocation should include a Delivery Strategy to identify how the development will be implemented and managed is acknowledged. This delivery strategy should be consistent with the Delivery Strategy set out in the Core Strategy, which in itself is to be consistent with paragraph 4.11 of PPS12 which states that the infrastructure planning within the Core Strategy should include specific infrastructure requirements for the Strategic Sites which are allocated within it. It goes on to state that there should be flexibility within this.

#### Strategic Allocation 3 Surrey Canal Triangle

This policy allocates the Surrey Canal Triangle site for mixed use development. This policy is supported by Renewal.

However, following on from the comments above, Renewal is concerned with the requirement for a least 20% of the built floor space developed on the site to be for a mix of business space. This is very precise, and it is considered that the significant employment generated (the objective is to provide over 2,000 new jobs) will come from other sectors than just business. The comments made above under the heading of Core Strategy Policy 4 set out the position of Renewal on this.

The policy states that up to 2,500 new homes should be provided with a proportion of on-site affordable housing. There is ongoing work in relation to the quantum of development that is appropriate for the site and it is considered that the words "up to" should be replaced by "approximately".

It is noted that the masterplan will need to consider amenity space and children's play space, including enhancement of an improved access to Bridge House Meadows. There is also reference to Surrey Canal Road Station.

It is considered that the descriptive text supporting Strategic Allocation 3 should state "The Infrastructure Delivery Plan identifies a set of physical, social and green infrastructure investments currently planned in the area. Additional investments can be made if needed in the longer term, and these will be identified and planned through the process described in Section 9, alongside partners in the LSP, as well as through the site masterplan, as set out in Policy SSA 1".

Text should also be added to the policy itself to state; "The physical, social and green infrastructure requirements of the development will need to be mitigated through on-site provision or developer contributions, as set out in Policy CSP 21".

#### Chapter 9 Delivery, Implementation and Programme

PPS12 states at paragraph 4.8 that the Core Strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of the type and distribution of development, who will provide it and when. At paragraph 4.11, PPS12 goes on to state that infrastructure planning for the Core Strategy should also include specific infrastructure requirements for any strategic sites which are allocated within it.

Further guidance in PPS12 is that a Core Strategy is to be deliverable, flexible and able to be monitored and in paragraphs 4.14 and 4.46 there is further emphasis on the need for flexibility as the Core Strategy puts forward a vision for over 15 years.

It is considered that the guidance above is met through a number of policies in the Core Strategy, and that subject to the additional comments above, the Core Strategy will be sound. Particularly, we would cite references to mitigation in the following policies:

SP1, CSP4, CSP12, CSP13, CSP14 as amended, CSP19, CSP20, CSP21, SSA1 and SSA3.

In addition, it is considered that there should be some additional wording in this chapter with regard to what is particularly covered by cross Borough discussions to co-ordinate issues in relation to education, health and leisure.

#### Proposals Maps for the Strategic Sites

Paragraphs 4.46 and 4.7 of PPS12 state that the allocation of Strategic Sites should be accompanied by a submission Proposals Map. It is acknowledged that there are identification maps alongside each Strategic Site, but clarification is sought as to whether these are the Proposals Maps referred to in paragraphs 4.6 and 4.7 of PPS12.

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1. Personal Details\*

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	RENEWAL
Address Line 1	22 BARDSLEY LANE
Line 2	
Line 3	
Line 4	LONDON
Post Code	SE10 9RF
Telephone Number	
E-mail Address (where relevant)	

2. Agent's Details (if applicable)

PAULA	
CARNEY	
DIRECTOR	
SIGNET PLANNING	
56 QUEEN ANNE STREE	T
	, ,
LONDON	
LONDON W1G 8LA	

carneyp@signetplanning.com

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate? Figure 6.1 Key Diagram

Paragraph	Policy	Proposals Map
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4. Do you consider the Core Strategy is:

4.(1) Legally compliant	Yes 🗆	No 🗆
4.(2) Sound*	Yes 🗆	No 😡

\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form

If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the Core Strategy is unsound because it is not:

(1) Justified	<b>Q</b>	
(2) Effective	D	

(3) Consistent with national policy 

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or <u>sound</u>. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary)

SEE SEPARATE PAPER SUBMITTED WITH REPRESENTATIONS.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

#### After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- **No**, I do not wish to participate at the oral examination
- Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

RENEWAL IS THE MAJORITY LANDOWNER OF THE LARGEST STRATEGIC SITE ALLOCATION IN THE CORE STRATEGY AND THEIR REPRESENTATIONS ARE IMPORTANT TO THE STRATEGY

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: 1) K

PAULA CARNEY, SIGNET PLANNING

Date:\_\_\_\_

6 APRIL 2010

1. Personal Details\*

2. Agent's Details (if applicable)

\_\_\_\_

\_\_\_\_\_

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title		MISS	
First Name		PAULA	
Last Name		CARNEY	
Job Title (where relevant)		DIRECTOR	
Organisation	RENEWAL	SIGNET PLANNING	
(where relevant)		56 QUEEN ANNE STREET	Г
Address Line 1	22 BARDSLEY LANE		
Line 2			
Line 3			
Line 4			
Post Code	SE10 9RF	W1G 8LA	
Telephone Number		0207 317 3110	
E-mail Address (where relevant)		carneyp@signetplanning	.com

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate?

Paragraphs 6.50 (and related Policy	Proposals Map
Paras 6.97, 6.12 and 6.156)	

4. Do you consider the Core Strategy is:

4.(1) Legally compliant	Yes 🗆 No 🗖
4.(2) Sound*	Yes 🗆 No 🖾

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If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the Core Strategy is unsound because it is not:

(1) Justified	K
(2) Effective	Ø

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary)

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- Yes, I wish to participate at the oral examination

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RENEWAL IS THE MAJORITY LANDOWNER OF THE LARGEST STRATEGIC SITE ALLOCATION IN THE CORE STRATEGY AND THEIR REPRESENTATIONS ARE IMPORTANT TO THE STRATEGY

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

PAULA CARNEY, SIGNET PLANNING

Date:\_\_\_\_

6 APRIL 2010

1. Personal Details\*

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	RENEWAL
Address Line 1	22 BARDSLEY LANE
Line 2	
Line 3	
Line 4	
Post Code	SE10 9RF
Telephone Number	
E-mail Address (where relevant)	

2. Agent's Details (if applicable)

PAULA	
CARNEY	
DIRECTOR	
SIGNET PLANNING	
56 QUEEN ANNE STREE	Г
LONDON	
W1G 8LA	

carneyp@signetplanning.com

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate?

Paragraphs <u>6.24—6.34</u>	Policy	Proposals Map
-----------------------------	--------	---------------

4. Do you consider the Core Strategy is:

4.(1) Legally compliant	Yes 🗆 No 🗆
4.(2) Sound*	Yes 🗆 No 🛙

\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form

If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified	
(2) Effective	K)

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

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Date:\_\_\_\_

6 APRIL 2010

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Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	RENEWAL
Address Line 1	22 BARDSLEY LANE
Line 2	
Line 3	
Line 4	LONDON
Post Code	SE10 9RF
Telephone Number	
E-mail Address (where relevant)	

2. Agent's Details (if applicable)

MISS			
PAULA			,
CARNEY	/		
DIRECT	OR		<u> </u>
SIGNET	PLANNI	NG	
56 QUE		E STREET	Γ
	N		
W1G 8L	A		
0207 31	7 3110		

carneyp@signetplanning.com

I

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate?

Paragraphs 6.45—6.48 Policy Proposals Map

4. Do you consider the Core Strategy is:

4.(1) Legally compliant	Yes 🗆 No 🗖
4.(2) Sound*	Yes 🗆 No 🖾

\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form

If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the Core Strategy is unsound because it is not:

(1) Justified	XI
(2) Effective	

(3) Consistent with national policy  $\Box$ 

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

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Signature: \_ PAULA CARNEY, SIGNET PLANNING

Date:\_\_\_\_

6 APRIL 2010

1. Personal Details\*

2. Agent's Details (if applicable)

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

		MISS
Title		
First Name		PAULA
		CARNEY
Last Name		
Job Title (where relevant)		DIRECTOR
Organisation	RENEWAL	SIGNET PLANNING
(where relevant)	0	56 QUEEN ANNE STREET
Address Line 1	22 BARDSLEY LANE	
Line 2		
Line 3		
Line 5	LONDON	LONDON
Line 4		
Post Code	SE10 9RF	W1G 8LA
<b>_</b>		0207 317 3110
Telephone Number		
E-mail Address (where relevant)		carneyp@signetplanning.com

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate?

Paragraphs <u>6.57</u>	Policy	Proposals Map
------------------------	--------	---------------

4. Do you consider the Core Strategy is:

4.(1) Legally compliant	Yes 🗆	No 🗆
4.(2) Sound*	Yes 🗆	No 🖾

\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form

If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the Core Strategy is unsound because it is not:

(1) Justified		
(2) Effective	X	

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

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Signature: PAULA CARNEY, SIGNET PLANNING

Date:\_\_\_\_

6 APRIL 2010

1. Personal Details\*

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	RENEWAL
Address Line 1	22 BARDSLEY LANE
Line 2	
Line 3	
Line 4	LONDON
Post Code	SE10 9RF
Telephone Number	
E-mail Address (where relevant)	

2. Agent's Details (if applicable)

PAULA	
CARNEY	
DIRECTOR	
SIGNET PLANNING	6
56 QUEEN ANNE S	TREET
LONDON	
LONDON W1G 8LA	

carneyp@signetplanning.com

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate?

Paragraphs 6.74 Policy Proposals Map

4. Do you consider the Core Strategy is:

4.(1) Legally compliant	Yes 🗆 No 🗆
4.(2) Sound*	Yes 🗆 No 🖾

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If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified	X
(2) Effective	D

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

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Signature:

PAULA CARNEY, SIGNET PLANNING

Date:\_\_\_\_

6 APRIL 2010

1. Personal Details\*

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title		
First Name		PAU
Last Name		CARI
Job Title (where relevant)		DIRE
Organisation	RENEWAL	SIGN
(where relevant)		56 Q
Address Line 1	22 BARDSLEY LANE	
Line 2		!
Line 3		
Line 4		LON
Post Code	SE10 9RF	W1G
Telephone Number		0207
E-mail Address (where relevant)		carn

2. Agent's Details (if applicable)

<u> </u>				
PAULA				
CARNEY				
DIRECTO	R			
SIGNET P	PLANNIN	IG		
56 QUEEI	N ANNE	STREE	Т	
56 QUEEI	N ANNE	STREE	т	
56 QUEEI	N ANNE	STREE	Τ	
56 QUEEI	N ANNE	STREE	т 	
56 QUEEI	N ANNE	STREE	T 	
		STREE	T	

carneyp@signetplanning.com

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate?

Dorograph	Deliau 1. Housing/Table 7.1	
Paragraph	Policy	Proposals Map

4. Do you consider the Core Strategy is:

4.(1) Legally compliant	Yes 🗆 No 🗆
4.(2) Sound*	Yes 🗆 No 🛛

\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form

If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified	X
(2) Effective	又

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

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Signature: 🚺

PAULĂ CARNĚY, SIGNET PLANNING

Date:\_\_\_\_

6 APRIL 2010

1. Personal Details\*

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	RENEWAL
Address Line 1	22 BARDSLEY LANE
Line 2	
Line 3	
Line 4	LONDON
Post Code	SE10 9RF
Telephone Number	
E-mail Address	

2. Agent's Details (if applicable)

MISS
PAULA
CARNEY
DIRECTOR
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56 QUEEN ANNE STREET
W1G 8LA
0207 317 3110
carneyp@signetplanning.con

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate?

	4	
Paragraph	Policy	Proposals Map

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes □ No □

4.(2) Sound\* Yes □ No 🛛

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If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the Core Strategy is unsound because it is not:

- (1) Justified 🛛 🕅
- (2) Effective
- (3) Consistent with national policy  $\Box$

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Signature V PAULA CARNEY, SIGNET PLANNING

Date

1. Personal Details\*

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	<b></b> •	
First Name		PAULA
Last Name		CARNEY
Job Title (where relevant)		DIRECTOR
Organisation	RENEWAL	SIGNET PLANNING
(where relevant)	·····	56 QUEEN ANNE STREET
Address Line 1	22 BARDSLEY LANE	
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Line 3		
Line 4	LONDON	LONDON
Post Code	SE10 9RF	W1G 8LA
Telephone Number		0207 317 3110
E-mail Address (where relevant)		carneyp@signetplanning.com

2. Agent's Details (if applicable)

١	MISS
I	PAULA
(	CARNEY
	DIRECTOR
•	SIGNET PLANNING
!	56 QUEEN ANNE STREET
l	ONDON
۱	
1	
	0207 317 3110

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate?

Paragraph	Policy	Proposals Map
	, <u> </u>	1 1

4. Do you consider the Core Strategy is:

4.(1) Legally compliant	Yes 🗆 No 🗖
4.(2) Sound*	Yes 🗆 No 🖾

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(1) Justified	<u>x</u> i
(2) Effective	Σ.

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Signature: PAULA CARNEY, SIGNET PLANNING

Date:\_\_\_\_

1. Personal Details\*

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	RENEWAL
Address Line 1	22 BARDSLEY LANE
Line 2	
Line 3	
Line 4	LONDON
Post Code	SE10 9RF
Telephone Number	
E-mail Address (where relevant)	

2. Agent's Details (if applicable)

PAULA	
CARNEY	
DIRECTOR	
SIGNET PLANNI	ÍNG
56 QUEEN ANN	E STREET
W1G 8LA	

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate?

Development	14	
Paragraph	Policy	Proposals Map_

4. Do you consider the Core Strategy is:

4.(1) Legally compliant	Yes 🗆	No 🗆
4.(2) Sound*	Yes 🗆	No 🖾

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(1) Justified		
(2) Effective	Я.	

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Signature: W

AULA CARNEY, SIGNET PLANNING

Date:\_\_\_

1. Personal Details\*

2. Agent's Details (if applicable)

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title		·
First Name		PAU
Last Name		CAR
Job Title (where relevant)		DIR
Organisation	RENEWAL	SIG
(where relevant)		56 C
Address Line 1	22 BARDSLEY LANE	
Line 2		-
Line 3		
Line 4	LONDON	LON
Post Code	SE10 9RF	W10
Telephone Number		
E-mail Address (where relevant)		carn

PAULA	
CARNEY	
DIRECTOR	
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56 QUEEN	ANNE STREET
LONDON	
LONDON W1G 8LA	

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate?

Development	<u> </u>	
Paragraph	Policy	Proposals Map

4. Do you consider the Core Strategy is:

4.(1) Legally compliant	Yes 🗆 No 🗆
4.(2) Sound*	Yes 🗆 No 🖾

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(1) Justified	Ł
(2) Effective	

(3) Consistent with national policy

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- **No**, I do not wish to participate at the oral examination
- Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

RENEWAL IS THE MAJORITY LANDOWNER OF THE LARGEST STRATEGIC SITE ALLOCATION IN THE CORE STRATEGY AND THEIR REPRESENTATIONS ARE IMPORTANT TO THE STRATEGY

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: AL

PAULA CARNEY, SIGNET PLANNING

Date:\_\_\_\_

1. Personal Details\*

2. Agent's Details (if applicable)

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title		MISS
First Name		PAULA
Last Name		CARNEY
Job Title (where relevant)		DIRECTOR
Organisation (where relevant)	RENEWAL	SIGNET PLANNING
Address Line 1	22 BARDSLEY LANE	56 QUEEN ANNE STREET
Line 2		
Line 3		
Line 4	LONDON	LONDON
Post Code	SE10 9RF	W1G 8LA
Telephone Number		0207 317 3110
E-mail Address (where relevant)		carneyp@signetplanning.com

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate?

Paragraph	Policy <sup>19</sup>	Dropocole Man
r arayrapri		Proposals Map

4. Do you consider the Core Strategy is:

4.(1) Legally compliant	Yes 🗆	No 🗆
4.(2) Sound*	Yes 🗆	No 🛛

\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form

If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the Core Strategy is unsound because it is not:

(1) Justified	
(2) Effective	X

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

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#### SEE SEPARATE PAPER SUBMITTED WITH REPRESENTATIONS.

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Signature: M

PAULA CARNEY, SIGNET PLANNING

Date:\_\_\_

.

1. Personal Details\*

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Title		
First Name		F
Last Name		C
Job Title (where relevant)		0
Organisation (where relevant)	RENEWAL	9
Address Line 1	22 BARDSLEY LANE	5
Line 2		
Line 3		· ·
Line 4	LONDON	L
Post Code	SE10 9RF	۷
Telephone Number		0
E-mail Address (where relevant)		C.

MISS	
PAULA	
CARNEY	
DIRECTOR	
SIGNET PLANNING	
56 QUEEN ANNE STREET	
LONDON	
W1G 8LA	
0207 317 3110	
carneyp@signetplanning.com	1

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate?

<b>D</b>	<u> </u>	
Paragraph	Policy	Proposals Map

4. Do you consider the Core Strategy is:

4.(1) Legally compliant	Yes 🗆	No 🗆
4.(2) Sound*	Yes 🗆	No

\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form

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5. Do you consider the Core Strategy is unsound because it is not:

(1) Justified	×
(2) Effective	Ď

(3) Consistent with national policy

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PAULA CARNEY, SIGNET PLANNING Signature: 1

Date:\_\_\_\_

1. Personal Details\*

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Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	RENEWAL
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Line 2	
Line 3	
Line 4	LONDON
Post Code	SE10 9RF
Telephone Number	
E-mail Address (where relevant)	

2. Agent's Details (if applicable)

PAULA	
CARNEY	
	8
SIGNET PI	LANNING
56 QUEEN	ANNE STREET
LONDON	
LONDON W1G 8LA	

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate?

Paragraph \_\_\_\_\_ Policy Strategic Allocation Proposals Map\_\_\_\_\_\_
1.

4. Do you consider the Core Strategy is:

 4.(1) Legally compliant
 Yes □ No □

 4.(2) Sound\*
 Yes □ No ⊠

\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form

If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the Core Strategy is unsound because it is not:

(1) Justified	
(2) Effective	X
(3) Consistent with national policy	

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

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Signature: k A PAULA CARNEY, SIGNET PLANNING

Date:\_\_\_\_

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\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	
First Name	3
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	RENEWAL
Address Line 1	22 BARDSLEY LANE
Line 2	
Line 3	
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Post Code	SE10 9RF
Telephone Number	
E-mail Address (where relevant)	

2. Agent's Details (if applicable)

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CARNEY	
DIRECTOR	
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LONDON	
LONDON W1G 8LA	

carneyp@signetplanning.com

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate?

Paragraph \_\_\_\_\_ Policy <u>Strategic Allocation</u> Proposals Map\_\_\_\_\_\_ 3.

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes □ No □

4.(2) Sound\* Yes □ No 🕱

\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form

If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified	×
(2) Effective	X

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

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Date:\_\_\_\_

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Title	
First Name	
Last Name	· · · · · · · · · · · · · · · · · · ·
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Organisation (where relevant)	RENEWAL
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Post Code	SE10 9RF
Telephone Number	
E-mail Address (where relevant)	

PAULA	
CARNEY	
DIRECTOR	
SIGNET PLANNING	3
56 QUEEN ANNE S	STREET
<del></del>	
LONDON	
W1G 8LA	

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate?

Paragraph	Policy	Proposals Map_F	or strategic sites.
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4. Do you consider the Core Strategy is:

4.(1) Legally compliant	Yes 🗆 No 🗆
4.(2) Sound*	Yes 🗆 No 🕰

\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form

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5. Do you consider the Core Strategy is unsound because it is not:

(1) Just	ified			
(2) Effe	ctive			X
(0) 0	• •			

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Date:\_\_\_\_

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Title		-
First Name		PAULA
Last Name		CARNI
Job Title (where relevant)		DIREC
Organisation	RENEWAL	SIGNE
(where relevant)		56 QU
Address Line 1	22 BARDSLEY LANE	
Line 2		
Line 3		
Line 4		LOND
Post Code	SE10 9RF	W1G 8
Telephone Number		0207 :
E-mail Address (where relevant)		carney

2. Agent's Details (if applicable)

PAULA	· · · · · · · · · · · · · · · · · · ·		
CARNE	/		
DIRECT	OR		
SIGNET	PLANNI	NG	
	-		-
20 QUE	EN ANNI	SIREEI	
	EN AMNI		
	N		

carneyp@signetplanning.com

Name or Organisation : RENEWAL (AGENT: SIGNET PLANNING)

3. To which part of the Core Strategy does this representation relate?

Paragraph \_\_\_\_\_ Policy Chapter 9 Proposals Map\_\_\_\_\_

4. Do you consider the Core Strategy is:

4.(1) Legally compliant	Yes 🗆	No 🗆
4.(2) Sound*	Yes 🗆	No 🛛

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