



## Comment

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<b>Event Name</b>	Lewisham Site Allocations DPD - Proposed Submission Version
<b>Comment by</b>	CA Planning (Mr Alban Cassidy)
<b>Comment ID</b>	3
<b>Response Date</b>	23/04/12 10:18
<b>Consultation Point</b>	Map 2.64 Hither Green Sidings ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### 1. Legal Compliance

**Do you consider the Site Allocations Proposed Submission Document is legally compliant?** No

### 2. Soundness

If you enter NO in response to this question, please also answer Question 3. Otherwise go to Question 4 to give reasons why you consider the document is not legally compliant or to Question 8 if you just wish to comment on an aspect of the document. Notes explaining 'soundness' are to be found in the supporting documents of the introductory consultation page .

**Do you consider the Site Allocations Document is Sound?** No

### 3. Reasons for Unsoundness

Please select below, the reason why you consider the Site Allocations Document is unsound.  The document is not justified

### 4. Details of legal non-compliance or unsoundness

**Please give details below as to why you consider the document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the document please also use this box to give your reasons.**

In respect of SINC12, both the existing and proposed additional designated areas, the Council has no evidence that the sites are of importance for nature conservation. The Council has no survey or species information relating to the site, or any other information to indicate that the site is anything other than a non-descript area of vacant land. Accordingly none of the site should be designated as being of nature conservation importance.

### 5. Changes required to achieve legal compliance/soundness

**Please set out below the change(s) you consider necessary to achieve legal compliance or soundness. YOU WILL NEED TO SAY WHY YOU CONSIDER THIS CHANGE WILL ACHIEVE LEGAL COMPLIANCE OR SOUNDNESS. It will be helpful to add your suggested revised wording of any text.**

The site should be delated as a SINC. This will make the document legally compliant and sound as it will not be based upon an erroneous assumption about the nature conservation value of the site.

### 6. Participation in the Oral Examination

If your representation is seeking a change do you consider it necessary to participate in the oral part of the examination?  Yes

### 7. Reasons for Participating in the Oral Examination

**Please outline below your reasons for participating in the oral examination. You should note that the Inspector will determine the most appropriate procedure to adopt to hear those who indicate they wish to participate in the oral part of the examination.**

It will be necessary to participate in the oral examination in order to demonstrate that the Council's position is not justified as they lack any evidence to justify the designation of the site.