



# London Borough of Lewisham Local Development Framework

## Core Strategy

Development Plan Document (DPD)

Publication Stage Representation Form

Ref:

For official use only

**Please return your completed form to the London Borough of Lewisham by 5pm  
Tuesday 6<sup>th</sup> April 2010**

- By post to  
FREEPOST RRZZ TLHU GKZS  
Planning Service  
London Borough of Lewisham  
5<sup>th</sup> Floor, Laurence House  
1 Catford Road  
London SE6 4RU

or

- By e-mail to [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk)

**You may also make your representation online without the need to use this form.**

- Online at <http://consult.lewisham.gov.uk/portal>

For further information, or to request extra representation forms please phone  
020 8314 7400 or e-mail [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk) .

This form has two parts  
Part A – Personal Details  
Part B – Your representation(s).

Please fill in a separate sheet for each representation you wish to make.

# Part A

## 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	Mr	
First Name	Malcolm	
Last Name	Bacchus	
Job Title (where relevant)		
Organisation (where relevant)	Telegraph Hill Society	
Address Line 1	92 Jerningham Road	
Line 2	London	
Line 3		
Line 4		
Post Code	SE14 5NW	
Telephone Number	020 7635 9421	
E-mail Address (where relevant)	ths@baccma.co.uk	

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph Whole document Policy \_\_\_\_\_ Proposals \_\_\_\_\_  
Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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

(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)*

The period set out for consultation is insufficient for local voluntary organisations. The Council has taken a full year to draft a document of 194 pages – plus separate explanatory documents – yet they have given consultees under two months to read the whole, old any meetings they wish to organise to collect views and to write responses.

This may just about be acceptable for organisations with paid staff. It is completely unacceptable for voluntary groups who have to try to do this unpaid in their spare time.

To even think of asking respondents to suggest alternative wording this time – given the documentation has taken a year to draft – shows a complete lack of understanding of the lives of residents and a complete disregard for the democratic consideration of opinions. This is a document which is intended to guide for 15 years. 6 weeks consultation upon it is an insult.

As a result the consultation will neither be as deep nor reasoned as it could be and is contrary to natural justice. The document should be withdrawn and reissued with a longer consultation period. – [continues on next page – the form has not been designed to allow the boxes to extend beyond a page]

Continued .... had we had a longer time, there would be many more sections of this document we would comment on, we do not have the resources however to type out all those responses in the time available.

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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)

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

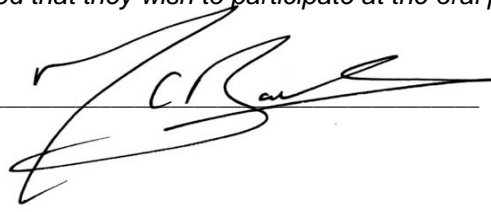
- No, I do not wish to participate at the oral examination**
- Yes, I wish to participate at the oral examination**

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

I wish to argue that the consultation process is an abuse of process and should be extended.
--

**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: \_\_\_\_\_

A handwritten signature in black ink, appearing to be 'C. R. ...', written over a horizontal line.

Date: 4 April 2010 \_\_\_\_\_

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph 5.5 Policy CS Obj 2 Proposals Map

4. Do you consider the Core Strategy is. In respect of this representation:

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 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)*

The housing proposal for the Deptford and New Cross area is excessive.

Please see our letter dated 1 April 2009 relating to the previous consultation on this matter. We regret that we do not have the resources to repeat these in full here in the time available. The main points made were:

- Building more homes is not the only nor the best way to create regeneration
- The additional traffic infrastructure proposed is not sufficient to cater for the additional demand.
- No significant new parks and few new facilities are being proposed to cater for the demand of the additional population
- The proposals will not meet the objectives that the plan sets out of making Lewisham a better and more vibrant place to live and work, it will simply continue the trend of the last 10 years of turning the borough into a inner-London dormitory for central London workers.

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)

A reduction of the housing targets for the north of the borough to no more than the London Plan targets. Lower if this can be agreed with central government. An increasing concentration on providing working space rather than dormitory housing space.

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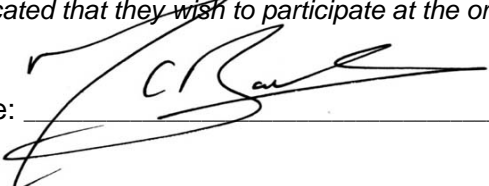
8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- 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:

Because the consultation period was not long enough to allow us fully to express all our views in writing in this document

**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: 

Date: 4 April 2010 \_\_\_\_\_

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_\_\_ 5.6 \_\_\_\_\_ Policy \_\_\_\_\_ CS Obj 3 \_\_\_\_\_ Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 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)*

The strategy is drafted in a manner which assumes that provision must be made to meet any housing demand placed upon it regardless of the other needs of the borough's existing population. Thus housing demand for new residents is apparently prioritised over, for example, giving adequate leisure facilities, park space or job opportunities for existing residents and regardless of the impact that it might have for existing residents.



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)

5.6 Provision will be made to meet the housing needs of Lewisham's new and existing population in so far as it does not result in a reduction of the quality of life (including amenity provision by way of leisure facilities, travel capacity, open space and job opportunities) for existing residents of the borough, and will include:

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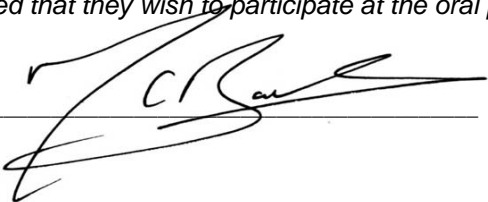
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Signature: 

Date: 4 April 2010 \_\_\_\_\_

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_\_\_ 5.7 \_\_\_\_\_ Policy \_\_CS Obj 4\_\_\_\_\_ Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 X

(3) Consistent with national policy X

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)*

As outlined in our letter of 1 April 2009, under what was then Core Strategy Objective 3 , we do not believe that the Core Strategy goes anywhere near far enough in focusing on developing the employment prospects within the Borough. Too much emphasis is given to housing and nowhere near enough to how the Borough can be made once again attractive to employers. This whole area needs to be rethought.

Sub policies (a) and (b) merely talk about retention. (d) and (e) are about shopping which, whilst giving some employment opportunities, can only be secondary to providing jobs in the commercial sector. Sub-policy (c) references future growth but limits it only to mixed used redevelopment of industrial sites and which by definition, will actually reduce the amount of space available for primary employment use by sharing it with housing demand.

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)

We are not competent to re-write this in the time available; we believe however that to make the objective compatible with employment growth for a self-sustaining community, rather than one relying on primary employment within central London, the whole area needs reconsideration.

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Signature: 

Date: 4 April 2010 \_\_\_\_\_

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_\_\_ 5.10 \_\_\_\_\_ Policy \_\_\_CS Obj 7\_\_\_\_\_ Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

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(2) Effective X

(3) Consistent with national policy X

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As outlined in our letter of 1 April 2009, under what was then Core Strategy Objective 6, we believe that this strategy does nothing more than preserve the status quo. The Strategy needs to consider how the Council can increase the number of open spaces within the Borough in line with any increase in population proposed.

This is particularly important in the North of the Borough. The Council is proposing a massive increase in housing with no increase in the amount of park space despite the Northern part of the Borough having already been identified as having a deficit of open space. This will cause a deleterious impact on the quality of lives of residents.

See also our detailed comments on para 6.54 et seq

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)

Add a new a:

- a. Ensuring that, in the Deptford/New Cross area, the balance between new development and new open space is controlled such that there is an overall increase in the amount of public open space per resident on a year-on-year basis during the period of this Plan

**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.

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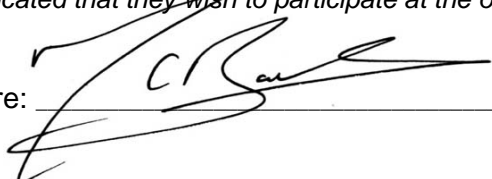
- No, I do not wish to participate at the oral examination**
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Signature: \_\_\_\_\_



Date: 4 April 2010 \_\_\_\_\_

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_\_\_ 5.12/ 5.13 \_\_\_\_\_ Policy \_\_\_\_\_ CS Obj 9 \_\_\_\_\_ Proposals  
Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 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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As outlined in our letter of 1 April 2009, under what was then Core Strategy Objective 8, we believe that this strategy is insufficient to accommodate all the demands of the new housing that the plan requires and will impact adversely on the lives of existing residents whilst doing nothing to attract new residents to the New Cross/Deptford (if this is indeed desirable given the existing population density and lack of open space).

The infrastructure projects in 5.13(a) are not new and show none of the vision required to resolve the transport issues that will arise over the period of the plan. One of them, the removal of Kender gyratory system, is in fact – as we have previously argued – contrary to the policy outlined as it makes the connectivity for pedestrians between the north and south of the A2 more difficult rather than improving it and will lengthen both foot and car journey for residents of Telegraph Hill

Please refer to our letter of 1 April 2009 (paragraphs headed “Core Strategy Objective 8”) for our objections relating to the lack of reality in the proposals for reducing the reliance on private cars and the lack of cohesion between this policy, the housing policy and sustainable development.

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)*

We do not have the time or expertise to develop the various themes which are needed to provide a coherent transport strategy for the period of the plan. Considerable work needs to be done in putting additional projects and aims into 5.13(d). Inter alia, we would expect to be included in this list:

- consideration of increased rail capacity on the Southern Rail services to London Bridge,
- the restoration of rail services directly through to Charing Cross
- the potential for re-creating a station at Brockley Cross as an interchange between the Victoria and London Bridge/Charing Cross services
- better liaison and planning over bus routes and frequencies with TfL
- better liaison and planning over rail routes with the Department of Transport
- potential extension of the underground network (proposals for the extension of the Bakerloo line through Camberwell and on to New Cross and Woolwich or Lewisham for example will need to be considered during the life of this plan)
- potential extensions to the DLR or Croydon Tram to service parts of the borough

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

**Yes, I wish to participate at the oral examination**

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Signature: \_\_\_\_\_



Date: 4 April 2010 \_\_\_\_\_

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph 5.14 Policy CS Obj 10 Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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4.(2) Sound\* Yes  No

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We are not convinced this policy as set out will be adopted in practice in anything other than the weakest form.

We are already aware, for example, of a massive new proposal for housing on the New Cross Gate Sainsbury’s site which constitutes significant overdevelopment in an area of principally 2- and 3- storey properties and which will have a deleterious impact on both the visual amenities and environment of the area of Telegraph Hill for existing residents.

It would appear however despite fine words about only making “sensitive”, “appropriate” developments, the Council’s view of what is sensitive and appropriate is coloured entirely by the perceived need to provide more and more housing and not at all by what is sensitive and appropriate having regard to the surrounding area.

We note that the existing policies URB16, 17,18,19 and 20 are all replaced by Objective 10 and CS Policies 15 and 16 and yet they give no where near so much detail as the existing policies / continued next page.



The amount of protection that is being given to Conservation Areas in the Borough is therefore being severely weakened. There is, for example:

- No longer any reference to the consideration of the impact of high buildings on Conservation Areas, parks etc.
- No longer any reference to resisting development which has a negative impact on Conservation Areas
- Loss of reference to detailed applications only in conservation areas; reduced guidance on scale, compatibility etc, removal of boundaries etc

The existing policies have been weak in protecting the Conservation Areas in the borough (partly through woolly wording and partly through weak interpretation or enforcement); these proposals in the Core Strategy to remove even the existing wording simply weakens the protection still further.

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*(Continue on a separate sheet /expand box if necessary)*

We would require that the majority of the existing URB 16, 17, 18, 19 and 20 be imported into the Core Strategy document word for word. If this is too much detail for this document then reference should be made to their retention and they should be included in an appendix of detailed planning rules. They should not be relegated to guidance.

In doing this we would wish the wording of the imported URBs to be tightened to provide firmer rules on what is acceptable and what is not.

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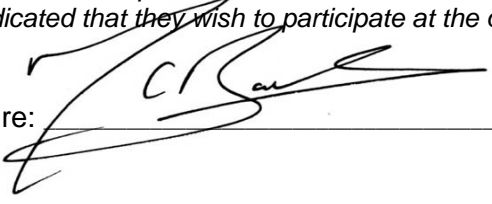
X **Yes, I wish to participate at the oral examination**

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Signature: \_\_\_\_\_

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Date: 4 April 2010 \_\_\_\_\_

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph 6.11 Policy Figure 6.1 Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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4.(2) Sound\* Yes  No

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1/ The proposals map identifies a small area to the south of the A2 extending through the Telegraph Hill Conservation Area as an area for “Regeneration and Growth”. This area a part of the Conservation Area already wholly housing (with the exception of the New Cross Bus Depot) developed as part of the Haberdashers’ Estate in the 1870s.

Any development within this area would conflict with the existing policies on the Conservation Area and would detrimentally impact on the Conservation Area.

2/ We are also concerned that high-rise and dense development directly to the north of the A2 in New Cross Gate would impact adversely on the Telegraph Hill and Hatcham Conservation Areas, in terms of visual amenity, knock-on effects of overflow parking and strain on existing facilities, particularly parks. Protection should be given to those Conservation Areas in this respect.

At present the map is inconsistent with the desire expressed in para 6.43 that “The Telegraph Hill and Hatcham Conservation Areas covering the ‘high street’ along New Cross Road will be retained and development will need to retain or enhance their characteristics.”

That description is one of “stability and managed change” and the areas on the map should reflect that.

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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)

1/ The “Regeneration and Growth” area should not extend south of A2 between the westerly border of the borough and the railway line at New Cross Gate. The Conservation Area should be an area “for Stability and Managed Change”.

2/ A strip directly to the north of the A2 encompassing the Hatcham Conservation Area and the northern border of the A2 between the junction with the Queens Road and New Cross Railways Station should be designated as part of the “Area for Stability and Managed Change” rather than as “Regeneration and Growth” in order to protect both Conservation Areas.

A concomitant wording change will be needed in Spatial Policy 2 as set out on page 43

**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:

This protection is so fundamental to residents’ enjoyments of the Conservation Areas which should not be regarded as “Regeneration and Growth” areas but as areas for “Stability and Managed Change” that we would wish to argue this point in detail.

**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: \_\_\_\_\_

A handwritten signature in black ink, appearing to be 'C. R. ...', written over a horizontal line.

Date: 4 April 2010 \_\_\_\_\_

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_\_\_ after 6.17 \_\_\_\_\_ Policy Spatial Policy 2 \_\_\_\_\_ Proposals  
Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 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)*

The housing proposal for the Deptford, Deptford Creekside and New Cross/New Cross Gate area is excessive.

Please see our letter dated 1 April 2009 relating to the previous consultation on this matter. We regret that we do not have the resources to repeat these in full here in the time available. The main points made were:

- Building more homes is not the only nor the best way to create regeneration
- The additional traffic infrastructure proposed is not sufficient to cater for the additional demand.
- No significant new parks and few new facilities are being proposed to cater for the demand of the additional population
- The proposals will not meet the objectives that the plan sets out of making Lewisham a better and more vibrant place to live and work, it will simply continue the trend of the last 10 years of turning the borough into a inner-London dormitory for central London workers.

/continued below

Our principal concern lies with the New Cross/New Cross Gate area which we consider to have different characteristics from those of the area bordering the Thames and extending around Surrey Canal.

Even if it were accepted that the housing targets could be accommodated and were the correct method of regenerating the borough, the targets are not sufficiently localised to ensure that overdevelopment of the New Cross/New Cross Gate area will not take place. This area can support considerably fewer new homes than the northern part of the area because it is already densely housed and has fewer (or no) spaces for new parks or other facilities which new housing would demand.

-----  
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)

A reduction of the housing targets for the north of the borough to no more than the London Plan targets. Lower if this can be agreed with central government. An increasing concentration on providing working space rather than dormitory housing space.

In addition to that, and also failing that, the plan should subdivide the area into three segments: (a) Deptford/Deptford Creek/Convoys Wharf (b) New Cross/New Cross Gate and (c) Surrey Canal Triangle and examine the issues in each separately, setting separate targets for each area.

We do not have the time or expertise to do provide more detailed suggested wordings in the time allotted to this consultation.

**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:

Because the consultation period was not long enough to allow us fully to express all our views in writing in this document

**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:  \_\_\_\_\_

Date: 4 April 2010 \_\_\_\_\_



## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_\_\_ after 6.17 \_\_\_\_\_ Policy Spatial Policy 2 (i) \_\_\_\_\_ Proposals  
Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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
- (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)*

De-localised small businesses:

- give people the opportunity to work and live in the same area, reducing the need for travel
- are a major employer; contributing significantly to the economy of the country and
- contribute to community development and involvement.

The Council’s proposal in (i) which merely “retains” a scattering of “other small businesses” is ill-conceived and will not contribute to the Strategic Plan.

The Council should be fostering and promoting small businesses which are integrated into the community and which reduce the need for travel to work.

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)

Delete (i) "retain a scattering of other small business premises where viable" and replace by:

- (i) will fostering and promoting small businesses which are integrated into the community and which reduce the need for travel to work.

Paragraphs 6.149 and 6.150 will need to be re-written to develop policies to achieve this aim.

**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:

Because the consultation period was not long enough to allow us fully to express all our views in writing in this document

**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: 

Date: 4 April 2010

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph 6.43 Policy \_\_\_\_\_ Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

4.(1) Legally compliant Yes X No

4.(2) Sound\* Yes X 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

(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)*

We wish to support the following statement: “The Telegraph Hill and Hatcham Conservation Areas covering the ‘high street’ along New Cross Road will be retained and development will need to retain or enhance their characteristics.”

We are deeply concerned that proposals for high-rise developments at the Sainsbury’s store at New Cross Gate will have a deleterious impact on the visual amenity of the area which is predominately 3- 4- storey Victorian shops with flats above.

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)

**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:

Only if the policy proposal is challenged by others for deletion.

**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: \_\_\_\_\_

A handwritten signature in black ink, appearing to be 'C. B. Smith', written over a horizontal line.

Date: 4 April 2010 \_\_\_\_\_

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph 6.54 onwards Policy \_\_\_\_\_ Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 X  
(3) Consistent with national policy X

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)*

Para 6.54 notes that the Council will take opportunities to increase the quantity of open space in the north of the Borough to address current deficiencies. Para 6.56 notes that there will be increasing pressure on the open space in the area.

The subsequent paragraphs however do little to ensure that there will be sufficient additional open space to cater for the increase in housing proposed and places no targets upon this.

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)

As stated in our objection on paragraph 5.10 we would seek an explicit set of targets to be added along the following lines:

- a. Ensuring that, in the Deptford/New Cross area, the balance between new development and new open space is controlled such that there is an overall increase in the amount of public open space per resident on a year-on-year basis during the period of this Plan

In addition, there should be a commitment to looking at density of park and open space usage on a more detailed level. For example, if significant new housing is proposed in New Cross/New Cross Gate, residents are unlikely to find any advantage in new open space in Convoys Wharf. The policy needs to be split into finer detail to ensure that there is sufficient additional open space within walking distance of all new developments so as not to have a deleterious effect on existing open space and existing residents' enjoyment thereof. We do not have the time given the length of the consultation period to suggest a more detailed wording.

**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:

Because the consultation period was not long enough to allow us fully to express all our views in writing in this document

**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: \_\_\_\_\_

A handwritten signature in black ink, appearing to be 'J. C. [unclear]', written over a horizontal line.

Date: 4 April 2010 \_\_\_\_\_



## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_\_\_ 6.60 et seq \_\_\_\_\_ Policy \_\_\_\_\_ Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 X  
(3) Consistent with national policy X

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)*

We consider that there are serious flaws with the “transport evidence base” if it suggests that “additional trips generated from potential development [over over 10,000 new homes] can be accommodated on the future rail, DLR and bus networks”.

Capacity on the lines into London Bridge are already at overcrowding point and the current proposals by Southern Railways are to reduce, not increase, the level of services.

We note that 6.62 states that the rail network in Deptford and New Cross presents a key barrier and has low public transport accessibility. The proposals in the strategy do not go anywhere near far enough to alleviate this problem and we are concerned that the proposals for new housing are therefore ill-conceived in the absence of a more detailed and more ambitious transport policy.

Plans for transport infrastructure changes need to be in place before the developments proceed. Plans for 2025 need to be started now. Set in the light of the length of the plan, the Strategy set out show little insight into the future issues nor breadth of vision in their solution.

*/continued below box*

We would expect, for example, the Strategy to include additional imaginative proposals and to lobby for them with TfL and Network Rail: such as the previously proposed and never implemented extension to the Bakerloo line through Camberwell and New Cross or the further extension of the DLR or Croydon Tram network through the borough.

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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)

We recommend a reduction in the level of housing targets for this area, coupled with a great development of local businesses so that the borough creates an area where people can both work and live. The proposed housing policy is one of a dormitory suburb for central London which creates, rather than alleviates, demand for travel.

We would also refer you to our objections to Core Strategy 9 where we suggest the infrastructure considerations (see para 6.61) should also be supplemented by, inter alia,

- consideration of increased rail capacity on the Southern Rail services to London Bridge,
- the restoration of rail services directly through to Charing Cross
- the potential for re-creating a station at Brockley Cross as an interchange between the Victoria and London Bridge/Charing Cross services
- better liaison and planning over bus routes and frequencies with TfL
- better liaison and planning over rail routes with the Department of Transport
- potential extension of the underground network (proposals for the extension of the Bakerloo line through Camberwell and on to New Cross and Woolwich or Lewisham for example will need to be considered during the life of this plan)
- potential extensions to the DLR or Croydon Tram to service parts of the borough

*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?

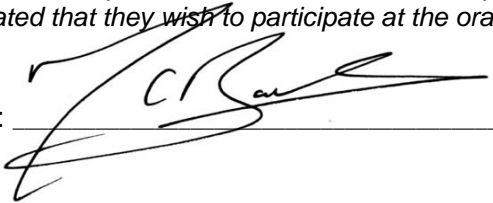
- No, I do not wish to participate at the oral examination**  
 **Yes, I wish to participate at the oral examination**

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

Because the consultation period was not long enough to allow us fully to express all our views in writing in this document

**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: \_\_\_\_\_

A handwritten signature in black ink, appearing to be 'J. C. [unclear]', written over a horizontal line.

Date: 4 April 2010 \_\_\_\_\_

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_\_ 6.61 (specific)\_and 6.67 (specific)\_\_\_\_\_ Policy\_\_\_\_\_ Proposals  
Map\_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 X  
(3) Consistent with national policy X

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)*

The removal of the Kender triangle gyratory system does not contribute to the strategy set out in 6.60. The removal has made it

1/ more difficult for those living south of the A2 to cross the road to the bus stops, post office, bank, shops and dentist on the north site of the road and increased the effect of the A2 as a barrier to pedestrians.

2/ Made it more difficult for those living in Telegraph Hill to return home by car from central London (no right turn into Queens Road) with a potential knock-on effect of displacing more traffic onto residential such as Pomeroy Street, Lausanne Road and possibly Kitto Road (although no study was done to model this effect)

3/ Created additional problems with regards to bus stands

It may have benefits to those living in the New Cross Gate development area but it does not “create a place that is easy to get around (permeable) for those living in Telegraph Hill.”

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)*

We accept that the proposal, although contrary to this policy, has already been started, therefore we would suggest that, as a matter of record,

1/ the last bullet point is removed from paragraph 6.61 as inconsistent with the requirement of easy pedestrian movements set out in para 6.60.

2/ The word "improving" is deleted from para 6.67 and replaced by "modifying". (It is an improvement for some residents and a distinct dis-improvement for others)

**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?

X **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:

**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: 

Date: 4 April 2010 \_\_\_\_\_

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph 6.62 Policy \_\_\_\_\_ Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 X

(3) Consistent with national policy X

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)*

We note the reference to “improved bus services” which, in this context we take to be more buses, higher-capacity buses or additional bus routes. As a general policy this requires some consideration.

In Telegraph Hill the frequency and size of buses travelling up and down residential side roads has increased significantly over the past few years. This has contributed to complaints of noise during the day, sleep disturbance at night, vibration problems as the buses pass the houses and air pollution problems. Whilst the needs of travellers through the area has improved, the quality of the lives of residents has fallen.

In any new improved bus services therefore all impact, including the effect on existing residents, needs to be taken into account.

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)

The phrase "A major aim of the strategy will be to improve accessibility through improved bus services" should be replaced by:

"A major aim of the strategy will be to improve accessibility through improved bus services provided that these can be introduced with no significant adverse impact on the quality of the lives of residents who already live in the area"

**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.

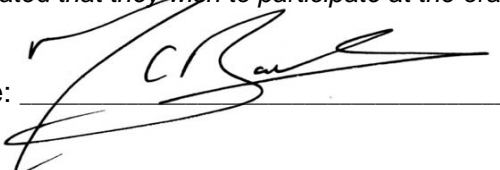
**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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

- X **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:

**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: 

Date: 4 April 2010 \_\_\_\_\_

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph 6.63 Policy \_\_\_\_\_ Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 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)*

We note the reference to the DLR three car upgrade increasing capacity by a quarter in the peak period.

We are aware that the service, which is already introduced, does not run three car trains outside the rush hour despite the fact that journeys into Lewisham between 7.00pm and 11.00pm are often standing room only as well.

There is no policy statement associated with paragraph 6.63 which seems to be merely a statement of an existing fact.



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)

Add to the end of paragraph 6.63:

The Council will continue to work with the DLR to seek sufficient capacity on the DLR at all times.

**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:

**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:  \_\_\_\_\_

Date: 4 April 2010 \_\_\_\_\_

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph 6.143 Policy \_\_\_\_\_ Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 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)*

Reference is made in 6.143 to protecting three bed plus properties from conversion within Areas of Stability and Managed Change. Most of Telegraph Hill is in such an area and the policy on restricting conversions is welcomed. However, as we have noted in our objection to para 6.11, the area of protection (Area for Stability and Managed Change) should go right up to the A2 from the south and encompass the whole of the Telegraph Hill Conservation Area.

There is too much conversion in the area already. The Lewisham SHMA shows that 25% of the residential stock is in converted properties and notes that this is the highest percentage in south-east London. In Telegraph Hill the figure is closer to 50%. This has considerably eroded the family population., More and more turning into transient 1 bedroom flats for Goldsmith students/those working in central London and using the area as a dormitory.

We therefore support this policy provided it encompasses the whole of the Telegraph Hill Conservation Area. /continued below

Without detailed guidance however we do not believe the policy will be effective. There are existing policies within the UDP which seek to retain family accommodation but the Planning Committees take no notice of them whatsoever when planning applications come before them and, in our area, conversions have risen from under 20% in 1990 to over 50% at present. The stock of family homes has been significantly reduced thereby; and the character of the area changed with a reduction in long term community and a more transient population. Furthermore the removal of family homes has pushed up the prices for those remaining, meaning that the choices are now between expensive family homes and cheap one-bedroom flats. Those seeking to move up the property ladder whilst wishing to live in the area find themselves excluded with no middle price-range properties available and have to leave. This neither promotes "life time living" within the area nor promotes community spirit. The absence of a fore-sighted application of existing planning principles protecting family homes has not helped the Conservation Area and, if new policies are being introduced, a clearer understanding and better enforcement of those policies is required.

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)

Add at the end of 6.143

"The Council will provide detailed policies on the protection of the supply of family homes on an area by area basis taking into account to these needs and will ensure that they are enforced through the planning process".

**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:

Because the consultation period was not long enough to allow us fully to express all our views in writing in this document and this policy is absolutely fundamental to the preservation of conservation areas, the achievement of the Council's aspiration for life long living in the area and the fostering of local communities.

*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:  \_\_\_\_\_

Date: 4 April 2010 \_\_\_\_\_

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph 6.144 Policy \_\_\_\_\_ Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 X

(3) Consistent with national policy X

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)*

Having suffered from infill development in our Conservation Area, some of which appears wholly inappropriate and other elements of which impact upon neighbouring amenity such as the views from windows (which is not protected in law) and parking, we welcome a specific policy on infill but again, as with our comments on 6.143, are not convinced that it goes far enough to protect Conservation Areas. In particular whilst it states that issues will need to be addressed, it does not indicate how this will happen.

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)

The list of considerations in the second sentence should be expanded to include impact on street parking

Add at the end of 6.144

“The Council will prepared detailed policies on infill development which will provide both overall guidance and, in the case of Conservation Areas, area-by-area guidance on what would will be considered when assessing the issues.”

**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:

Because the consultation period was not long enough to allow us fully to express all our views in writing in this document and this policy is extremely important to the protection of Conservation Areas.

**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:  \_\_\_\_\_

Date: 4 April 2010 \_\_\_\_\_



## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_\_ 6.1499 and 6.150 \_\_\_\_\_ Policy \_\_\_\_\_ Proposals  
Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 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)*

See our comments on Spatial Policy 2 (i) in respect of scattered local employment businesses to which we believe more attention should be given by the Council

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)

See our comments on Spatial Policy 2 (i). We do not have the time or the expertise to develop a full and appropriate policy for the Council on the development of small businesses in the time allotted to this Consultation.

**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.

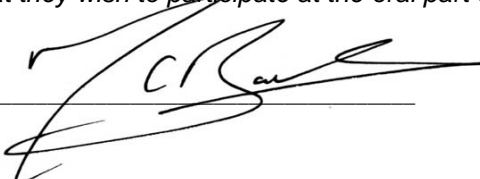
**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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

- X **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:

**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: 

Date: 4 April 2010

## Part B – Please use a separate sheet for each representation

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_\_\_ 6.176 \_\_\_\_\_ Policy \_\_\_\_\_ Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

4.(1) Legally compliant Yes X No

4.(2) Sound\* Yes X 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
- (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)*

We welcome the statement here on conservation areas. We trust however that it will apply to all Conservation Areas rather than just those within the areas for Stability and Managed Change. The format of the sections of the Core Strategy in this respect is difficult to follow but it appears only to relate to those area. If so, this is incorrect as Conservation Areas, equally worthy of protection, exist either wholly or partially outside the protection of “areas for Stability and Managed Change”.

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)*

Paragraph 6.176 should be moved (or repeated elsewhere in the document) so that it is clear that the requirements/protections relating to Conservation Areas relate to all Conservations and not just those which are within areas for Stability and Managed Change.

**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:

This is fundamental to the protection of Conservation Areas within the borough which reside partly or wholly outside the areas of managed changed.

**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:  \_\_\_\_\_

Date: 4 April 2010 \_\_\_\_\_

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_\_after 7.21\_\_\_\_\_  
Proposals Map\_\_\_\_\_ Policy\_\_\_\_Core Strategy Policy 5 (1)\_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 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)*

See our comments on Spatial Policy 2 (i) in respect of scattered local employment businesses to which we believe more attention should be given by the Council

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)*

See our comments on Spatial Policy 2 (i) in respect of scattered local employment businesses to which we believe more attention should be given by the Council

**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:

**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: \_\_\_\_\_

A handwritten signature in black ink, appearing to be 'C. B. ...', written over a horizontal line.

Date: 4 April 2010 \_\_\_\_\_



Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_after 7.45\_\_\_\_\_ Policy\_\_\_\_\_CS Policy 9\_\_\_\_\_ Proposals  
Map\_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 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)*

We note that there is an increasing prevalence of health related problems due to air pollution within the area and that the A2 through New Cross is designated as one of the worst spots.

In addition to the issues relating to traffic we remain worried that SELCHP contributes to these issues. We have anecdotal evidence that the level of dust deposited in houses in Telegraph Hill has increased over the past few years and that health problems have also increased. Whilst some of this could be due to increased traffic levels, some residents also attribute it to SELCHP whose tower is roughly on a level with Telegraph Hill.

We have no evidence whether this is so or not, but note that health concerns relating to Air pollution, including potential pollution from incineration plants, should be addressed within this part of the plan.

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)

Add:

c. Working with all businesses, including SELCHP, within Leiwsham to manage and improve air quality

**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:

Because the consultation period was not long enough to allow us fully to express all our views in writing in this document

**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: \_\_\_\_\_

A handwritten signature in black ink, appearing to be 'C. B. Smith', written over a horizontal line.

Date: 4 April 2010 \_\_\_\_\_

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_after 7.87\_\_\_\_\_ Policy\_\_\_CS Policy 12\_\_\_\_\_ Proposals  
Map\_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 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)*

We do not believe that this policy provides for enough open space to cater for the demand from the proposed increasing population. We have proposed in our response to paragraph 5.10 the targets that the Council should seek to achieve:

*Ensuring that, in the Deptford/New Cross area, the balance between new development and new open space is controlled such that there is an overall increase in the amount of public open space per resident on a year-on-year basis during the period of this Plan*

In providing sufficient space for the increased population (if the increase is desirable, which we doubt) only sub-policy (g) creates more space. All the others simply improve maintain or improve existing space but does nothing to eliminate the lack of existing open space in the north of the borough nor does anything to prevent that space from becoming more overcrowded as the population increases.

(g) is unlikely to provide sufficient space unless a large proportion of the space is taken out of development as, for example, Southwark did, with the creation of Burgess Park.

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)

Add new sub-policies:

- Ensuring that, in the Deptford/New Cross area, the balance between new development and new open space is controlled such that there is an overall increase in the amount of public open space per resident on a year-on-year basis during the period of this Plan
- Designating sufficient areas of land within areas of growth that will not be available for development such that the above targets can be met (areas to be identified on proposals map).
- Where possible if the opportunities arise the Council will consider acquiring additional land for the extension of existing parks or the creation of additional parks within the areas of greatest deprivation.

**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:

Because this is absolutely fundamental to the quality of life of residents.

**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: \_\_\_\_\_

A handwritten signature in black ink, appearing to be 'C. B. ...', written over a horizontal line.

Date: 4 April 2010 \_\_\_\_\_

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_after 8.87\_\_\_\_\_

Policy\_\_\_\_\_CS Policy 12\_\_\_\_\_

Proposals

Map\_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

4.(1) Legally compliant Yes X No

4.(2) Sound\* Yes X 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
- (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)*

We strongly support the designation of Telegraph Hill Park as additional Metropolitan Open Land.

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)

**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:

Only if there are any oral objections to this proposal, in which case we should like to have the opportunity to speak in its support.

**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: \_\_\_\_\_

A handwritten signature in black ink, written over a horizontal line. The signature is stylized and appears to be 'C. R. Smith'.

Date: 4 April 2010 \_\_\_\_\_

Name or Organisation : Telegraph Hill Society

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

Paragraph 7.118 Policy \_\_\_\_\_ CS Policy 14 \_\_\_\_\_ Proposals  
Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 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)*

We are extremely concerned about the implications of CS Policy 14 clause 4. We can see, for example, that large development in New Cross Gate which has a reduced car, or car free, status would create parking demand displacement in Telegraph Hill. The wording of the policy seems to mean that either residents would have to live with this or that a CPZ might be introduced. In either event, existing residents would finished up disadvantaged by the new development – in the case of a CPZ they would finish up financially disadvantaged as well – whilst the developer (and in the case of a CPZ, the Council) would profit thereby. This would not be fair to existing residents.

CPZs are not the answer. Disadvantaging existing residents for the benefit of developers is not the answer.

Regrettably the answer has to be that that the developer must either provide for a reasonable number of car parking spaces or the development must not be built.

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)

Delete 4.

**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:

Because the consultation period was not long enough to allow us fully to express all our views in writing in this document and because the proposed policy could be extremely detrimental and unfair on existing residents of the borough.

**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: 

Date: 4 April 2010 \_\_\_\_\_

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_After 7.139\_\_\_\_\_ Policy\_\_\_CS Policy 15\_3(e)\_\_\_ Proposals  
Map\_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 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)*

We strongly support this statement.

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)

**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**

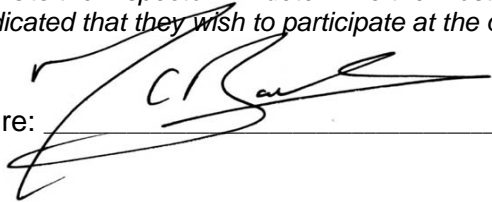
**Yes, I wish to participate at the oral examination**

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

Only if there are any oral representations to be made against this policy which we strongly support.

**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: \_\_\_\_\_



Date: 4 April 2010 \_\_\_\_\_

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_after para 7.136\_\_\_\_\_ Policy\_\_C S Policy 15\_\_6\_\_\_\_\_ Map\_\_\_\_\_

Proposals

4. Do you consider the Core Strategy is. In respect of this representation:

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 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)*

Paragraph 6(a) to 6(e), particularly 6(e), should relate to all Conservation Areas regardless of whether they are in an “Area of Stability and Managed Change” or partly or wholly in a “Regeneration and Growth Area”. Being in a “Regeneration and Growth Area” should not remove the controls over development in a Conservation Area – if anything they need to be more rigorously enforced in such areas as they are more likely to be under threat from developers.

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)

Either reword the whole Policy so that 6(a) to 6(e) apply to all relevant sections of the policy including "Regeneration and Growth Areas". This could be achieved to moving the wording to the section headed "Conversation areas, heritage assets and the historic environment".

Or

Add to the end of 3:

3 h. Policies 6(a) to 6(e) will be applied to Conservation Areas, or parts of Conservation Areas which lie within Regeneration and Growth Areas so that they are afforded similar protection.

**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.

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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:

Because the consultation period was not long enough to allow us fully to express all our views in writing in this document.

**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: 

Date: 4 April 2010

Name or Organisation : Telegraph Hill Society

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

Paragraph 7.154 Policy \_\_\_\_\_ Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 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)*

The views from Telegraph Hill should be noted in this paragraph and afforded protection.

Telegraph Hill was recognised by the Heritage Lottery Commission as having valuable local heritage in that it was the site of a link in the Telegraph chain which communicated during the Napoleonic wars between the Admiralty and Dover/Deal. The view over central London still remains mainly uncluttered and the line to the Admiralty can be made out. The Houses of Parliament and other London landmarks, including the Wembley Arch, can be seen and attract a number of visitors. It is possibly the closest that south London has to Parliament Fields for its views of central London.



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.  
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The views from Telegraph Hill should be noted in this paragraph and afforded protection.

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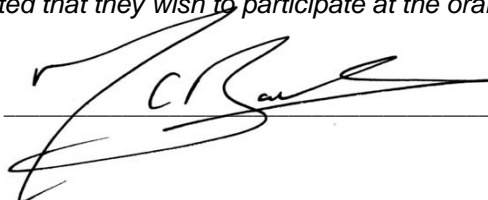
**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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

- X **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:

**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: 

Date: 4 April 2010\_\_\_\_\_

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_\_\_ 9.13 onwards \_\_\_\_\_ Policy \_\_\_\_\_ I.D.P. \_\_\_\_\_ Proposals  
Map \_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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 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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The IDP includes a "Major Landowners' Forum" to discuss and influence future infrastructure investment. Figure 9.1 also includes a "Major Developers' Forum" which may or may not be same thing. It does not however seem to include any direct mechanism for input from those most affected by any major scheme –the existing local residents.

Within the current system there is already a bias towards development where developers are often in discussion with the Council about what the Council thinks acceptable long before residents hear about the schemes. In many cases, the first opportunity for input from residents is once a scheme has already been refined to the stage where planning permission has been or will be sought.

In order to ensure fair treatment for all parties, the Council should development a mechanism whereby input from the affected residential areas has at least as much weight in the Council's due process as input from Major Landowners or Major Developers.

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)

Add a new paragraph after 9.18

The Council will develop mechanisms to ensure that early consultation with and input from residents affected by any proposed scheme is obtained at the earliest practical opportunity alongside the input from the Major Landowners' (or Major Developers' Forum).

In Figure 9, beside the box headed "Major Developers' Forum" insert a box headed "Local residents' forum"

With a footnote:

" \*or similar mechanism for obtaining views of affected local residents to be established"

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**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:

Because the consultation period was not long enough to allow us fully to express all our views in writing in this document.

**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: 

Date: 4 April 2010 \_\_\_\_\_

Name or Organisation : Telegraph Hill Society

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

Paragraph \_\_\_\_\_9.31\_\_\_\_\_ Policy\_\_\_\_|\_\_\_\_\_ Proposals Map\_\_\_\_\_

4. Do you consider the Core Strategy is. In respect of this representation:

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

(1) Justified X

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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)*

The Key milestones are biased in that they only record the advantages of the changes rather than its downside.

The correction of the downside elements should be targeted as key milestones going forward. See our comments on rail services elsewhere.

The loss of services and capacity at New Cross Gate Southern services into Charing Cross during the last six months is causing hardship and the further reduction of services into London Bridge will add to this. This will not be alleviated by the introduction of the ELLX (which goes to Whitechapel). Crucial to promoting and developing the area at New Cross is the restoration of the missing service capacity and this should be a priority on Lewisham's list of milestones.

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)

<p>Add in current key milestones pre-2011:</p> <p>Reduction on capacity on Southern Rail into London Bridge by 33% outside rushhour and withdrawal of all direct train services into Charing Cross (consequent on ELLX)</p> <p>Add into milestones 2011-2016:</p> <p>The restoration of the lost capacity on Southern Rail into London Bridge and the restoration of direct train services into Charing Cross.</p>
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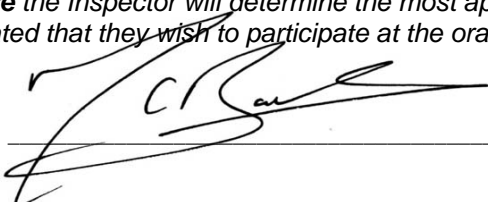
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- No, I do not wish to participate at the oral examination**
- Yes, I wish to participate at the oral examination**

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

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**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: 

Date: 4 April 2010 \_\_\_\_\_