

Survey:

What is your name? **Greg Blaquiere**

What is your organisation (if applicable)? **Terence O'Rourke Ltd on behalf of SMC Investcorp Ltd.**

1. Which part of the Plan are you commenting on?

Policy:	<input type="text" value="BESA3"/>	Paragraph:	<input type="text" value="N/A"/>	Table:	<input type="text" value="Figure 13
and
Figure 14"/>	Map:	<input type="text" value="Draft
Policies
map"/>
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2. Do you consider the Plan is:

Legally compliant?	Yes:	<input type="checkbox"/>	No:	<input checked="" type="checkbox"/>
Sound?	Yes:	<input type="checkbox"/>	No:	<input checked="" type="checkbox"/>

3. If you believe the Plan to be unsound, is this because it is not:

Positively prepared	<input checked="" type="checkbox"/>
Justified	<input checked="" type="checkbox"/>
Effective	<input type="checkbox"/>
Consistent with national policy	<input checked="" type="checkbox"/>

4. Please give reasons for your objection or support:

SMC Investcorp Ltd. have an interest in site allocation ref. BESA3 which is identified for allocation within the draft Local Plan for D1 and residential use.

The site was previously occupied by Gower House School which closed in July 2016 however, there is no evidence submitted to justify that a D1 use is required to be re-provided in this location. The school site has not been used for three years and as private school, it was independently operated before closing as no longer financially viable. There is no legal requirement for a private school use to be re-provided at the site. Furthermore, the site's context and characteristics limit the suitability of community facilities operating from the site, and this was evident when it was for sale in 2016. As such there is no justification provided for this requirement of the draft proposed policy, and the implication of seeking to retain D1 use which would be subject to a lengthy marketing

process, on a site which is readily available to develop, will unnecessarily delay the delivery of much needed housing in the Borough.

SMC Investcorp Ltd. supports the allocation of this land to deliver new homes in what is a suitable and sustainable location that is available now, with no technical constraints to delivering development. However, it is imperative to recognise that the land within SMC Investcorp's control can deliver a greater number of homes (circa 60 dwellings) than allocated in the plan, in accordance with national policy that highlights the importance of planning policies supporting development that makes efficient use of land.

Alongside this, the proposed development seeks to make effective use of a previously developed site, that currently suffers from security issues. The previous buildings on site have been demolished due to a series of incidents. The site would provide much needed housing in line with national, London and local planning policies.

5. What change(s) do you consider necessary to make the Plan legally compliant or sound?

The wording of the policy should be updated to refer to the provision of around 60 dwellings on the currently allocated site as residential use only, in the absence of any evidence that demonstrates the need for D1 replacement use.

6. If your representation is seeking a change, do you wish 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

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

SMC Investcorp Ltd considers it necessary to participate in the oral examination of the local plan in order to assist with the examination of the strategy as it has a significant interest in the land allocated in the plan under draft policy BESA3.

If you would like to comment on additional policies, please fix another sheet to this.

To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names and addresses of those making representations can be made available and taken into account by the Inspector. The Council, its

appointed Local Plan Programme Officer or the Planning Inspector appointed to undertake the Examination may also contact you regarding your response.

- Please indicate if you wish your personal data to be used for reasons other than identifying your representation and being contacted in relation to that representation.