

DC/17/100680 | SYDENHAM GAS HOLDER STATION, BELL GREEN, LONDON, SE26 4PX

I am writing on behalf of the Forest Hill Society to object to the proposed demolition of the last Bell Green gas holders and creation of a 100-space car park and two retail units - including A1 food retail.

The Forest Hill Society is the local amenity society for the area covered by SE23 and has around 400 members. The society is keen to ensure that the area develops in a positive way for the people that live and work in it. Generally we try to be positive about changes to the area and proposals for improvements, however in some cases it is necessary for us to raise concerns about proposals as part of the planning process.

Historic Context:

There is significant concern in the local community that an historic local landmark is proposed to be replaced by low quality architecture that is out of keeping with the neighbouring Grade II listed Livesey Memorial Hall and the War Memorial. We believe these plans for demolition and changing the setting of these listed buildings are contrary to Lewisham **planning policy: URB 18d: Preserving Listed Buildings**

To preserve and enhance Listed Buildings and their features of architectural or historic interest the Council will:

(d) have special regard to the desirability of preserving the setting of Listed Buildings in considering any application in their vicinity in terms of other policies

Traffic Management:

Since the opening of the retail park at Bell Green there has been a substantial increase in traffic to the site creating regular tailbacks on Southend Lane, Perry Rise, Perry Hill, and Bell Green. One result of this increase in traffic has been increased rat-running on neighbouring roads, especially Priestfield Road, Lescombe Road, Houston Road, Adamsrill Road, Champion Park, Moremead Road, and Breaside. This increase in traffic on main and residential roads has led to concern for local residents due to increased noise and pollution.

The area is recognised as having poor air quality due primarily to traffic around Bell Green (no doubt exacerbated by an increase in refrigerated lorries and vans servicing the retail units and by on site generators), this impacts local residents and the local

school. Adding additional retail units to this location will only increase this problem and further lower air quality for residents and primary school pupils in this location.

When the Bell Green site was first redeveloped there were proposals for a widening of the bridge at Southend Lane. This is now long overdue and jams regularly extend for more than half a mile up Southend Lane. Any increase in retail capacity in this location should find a solution to this problem rather than making it worse. In addition this pinch-point is dangerous for pedestrians and cyclists and has seen more than its fair share of collisions between lorries and the railway bridge above.

We believe that this development, without necessary mitigation factors, will result in an increase in pollution and noise, a reduction in health, and a reduction in safety for pedestrians and cyclists.

Impact on Local High Streets:

We are concerned that an additional supermarket in this location will pull more people from the existing high streets in Sydenham and Forest Hill. Recently Sydenham has seen the closure of a large town centre supermarket (previously Budgens) in an ideal location for a supermarket. The opening of Savacentre (now Sainsburys) saw a series of closures in the high streets. Sydenham and Forest Hill worked together on a successful Portas Pilot scheme, that brought retailers back to the town centre, but we fear this work would be undermined by a second supermarket in this out of centre location.

We would refer to government guidelines on town centre development which states that:

The sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of town centre locations, with preference for accessible sites which are well connected to the town centre. It supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking.

ref: <https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres>

In this case it is clear that at least one potential site for a supermarket is available in a local town centre, and for this reason the planning department, in applying the appropriate sequential tests, should recognised that this location for a new supermarket is inappropriate at the present time.

Contrary to Core Strategy and Site Allocations:

Bell Green is designated as a local hub, which is secondary to the District Hubs (such as Forest Hill and Sydenham). Under the Bell Green specific part of Spatial Policy 4 the floorspace on the allocated site is limited to that which had permission at the time of the adoption of the Core Strategy - specifically to limit impact on adjacent town centres.

The Site Allocations Policy DPD allocates the Bell Green site as SA26 and whilst identifying the need for development clearly identifies a risk of impact on nearby town centres and a need to seek to reduce car dependency. This application is directly in contravention of the site allocation in both these regards. Existing planning permission and designation in the Core Strategy and Site Allocations Local Plan specifically excludes food retail, allowing only for A1 use for non-food retail.

Core Strategy, Spatial Policy 4, June 2011

Bell Green

- 1. Designate as an out-of-centre retail park within the Council's retail hierarchy.*
- 2. Limit the floorspace and range of goods sold to that contained in the granted planning permission to protect the viability of adjacent town centres.*

Ref:

<https://www.lewisham.gov.uk/myservices/planning/policy/Documents/CoreStrategyAdoptedVersion.pdf> (page 68)

Site allocations local plan, June 2013

*SA26: Former Bell Green Gas Works (Phases 2 & 3), Perry Hill Sydenham, SE26
Phase 2: Mixed use business, industrial or warehouse, non-food retail and associated garden centre, restaurant, use of Livesey Memorial Hall as a social club*

Proposals for this out-of-centre site should be considered in the context of protecting existing town centres within the borough's hierarchy and, allow for comprehensive redevelopment of the site. Proposals should seek to reduce car dependency, improve public transport, cycling and walking access and promote more sustainable forms of development.

Ref: <https://www.lewisham.gov.uk/my services/planning/policy/LDF/site-allocations/Documents/SiteAllocationsAdoption.pdf> (pp 91-92)

Further Development Management Policy 30 sets out that *"the Council require all development proposals to attain a high quality of design"*. Which is not the case in this application because of the way it:

- a) fails to create activity and frontage at ground level,
- b) fails to create coherent built form that relates to the local topology,
- c) does not make a positive relationship with existing townscape,
- d) creates large areas of parking and servicing, and
- e) fails to recognise the positive character of the existing gas holders or reflect its positive qualities in the scheme.

Ref: <https://www.lewisham.gov.uk/my services/planning/policy/LDF/development-policies/Documents/DMLPAdoption.pdf> (page 85)

As a result of the issues above, we ask the planning authority to reject this application as being contrary to URB 18d, DM Policy 30, Spatial Policy 4, and national policy on supporting high streets.