

Re: DC/09/72209/X - 109 - 111 KIRKDALE, LONDON, SE26 4QJ

Dear Mr Whittington,

On behalf of the Forest Hill Society I wish to register our support for the Sydenham Society's objections to this application for two new buildings on the site of 109-111 Kirkdale. We believe there are a number of issues that the council should consider that make this development unsuitable at this location.

1. Streetscape

The proposed development is a storey higher than the two neighbouring properties on Kirkdale and significantly higher to the rear of the site. This section of Kirkdale has suffered from a variety of different architectural styles and heights of buildings. The development of this site to match the existing building line may be welcomed, but higher than the existing building line is inappropriate and contrary to council policies:

HSG4 (e) ensuring that new roof additions and extensions respect, where appropriate, the character of the surrounding area;

URB3 (a) scale and mass of development, particularly where a new development might be out of scale with the existing surrounding development;

(d) the height of the development should be in scale with adjoining buildings

2. Overlooking

There are a number of concerns regarding overlooking. These include:

- a) Overlooking from all floors above ground floor level on the front building, to the ground floor of the rear building
- b) Overlooking from the side of the rear building to the rear windows at 1st and 2nd floor level of the building at 113 Kirkdale

This overlooking is contrary to council policies:

HSG5 (a) provides a satisfactory level of privacy, outlook and natural lighting with appropriate provision of private amenity space;

HSG8 Backland and in-fill development will be permitted provided the following criteria are met:

(e) there should be no appreciable loss of privacy and amenity for adjoining houses and their back gardens;

3. Suitability of Entrance to the Rear Building

The rear building has an entrance directly onto the Willow Way site and access road. This provides no pedestrian protection when entering or leaving the property. This could be exacerbated by the development of additional rear gardens on Kirkdale, Dartmouth Road or the employment zone in Willow Way. This entrance and the access to the rear building is contrary to council policies

HSG8 Backland and in-fill development will be permitted provided the following criteria are met:

(d) there must be a proper means of access, suitable for the entry and egress of service vehicles which is convenient and safe both for drivers and pedestrians;

URB 3 (a) scale and mass of development, particularly where a new development might be out of scale with the existing surrounding development;

(d) the height of the development should be in scale with adjoining buildings

(e) new development should respect the scale and alignment of the existing street including its building frontages;

4. Lack of Parking Provision

The developer states that this could be a car free development and therefore needs no parking provision. They additionally recognise that there are a number of side roads that have no parking restrictions. With a number of family units it is not reasonable to expect all 9 units to be car free, especially when there are no controls on parking in local roads or to the rear of the site.

Willow Way is currently used by many employees of businesses located in the Willow Way employment zone for parking and for deliveries to these businesses. There are rarely parking spaces available during the daytime and the proposed development would worsen on street parking difficulties for local residents and businesses. There is also a likelihood that residents will park directly in front of the rear building, where there is no pavement. This in

undesirable for entrance and exit from the building and for service vehicles accessing the rear of other properties. For this reason the council should consider policies

HSG8 Backland and in-fill development will be permitted provided the following criteria are met: (e) on a road where additional on-street parking would not be permitted the development would not worsen any (on-street) parking problems;

HSG 11 The Council will encourage the conversion of the vacant upper floors of commercial premises such as shops for residential use. Applications should demonstrate that:

(b) a satisfactory living environment and standard of accommodation is provided with adequate access, environmental, parking and safety standards achieved.

5. Lack of Amenity Space

Although we welcome the inclusion of family accommodation in this area, adequate amenity space has not been provided for residents. The courtyard does not meet the 9 meter minimum garden depth and the balconies do not compensate for the lack of garden space. The terrace in flat 6 and the rear terrace in flat 2 are enclosed on four sides and are only properly open from above. The basement patio in flat 4 is likely to suffer from rubbish accumulating in the area making it poor quality amenity space.

This lack of amenity space is contrary to two council policies:

HSG 7 The Council will seek in all new dwellings the provision of a readily accessible, secure, private and usable external space. Family dwellings should be provided with their own private garden area. Normally, a minimum garden depth of 9 metres will be required.

HSG 8 Backland and in-fill development will be permitted provided the following criteria are met:

(a) sufficient garden depth and area should be retained by existing dwellings

In looking at other recent rejections by the council we feel that the following description of a proposed development in Trewsbury Road, SE26 matches with this development and recommend rejection on similar grounds.

The proposed development by virtue of the upper floor locations of the family units, their combined kitchen and living areas and the failure to provide adequately sized private amenity space for these units, renders the proposed development contrary to Policies URB 3 Urban Design, URB 6 Alterations and Extensions, HSG 4 Residential Amenity and HSG 5 Layout and Design of New Residential Development in the Councils adopted Unitary Development Plan (July 2004) and Chapters 2 & 3 of the Residential Development Standards SPD (August 2006).

6. Effect on Development Potential of vacant land in Employment Zone

Directly adjacent to the rear of this site is an employment zone which is currently under used. We are concerned that any development to the rear of this property will significantly change the nature of the area and would limit potential employment uses of the site on Willow Way. With the building right on the land boundary, with no space for pavement it will cause a danger to pedestrians accessing the proposed development from the existing levels of vehicles using the site and the potential for more vehicles using the site if, as it is hoped, the site will be more effectively used for employment and light industry in the future.

With regard to the access and to the effect on the character of the area, specifically the employment zone, this development is contrary to policy HSG8

(b) the scheme must respect the character of the area, including the cumulative impact;

(d) there must be a proper means of access, suitable for the entry and egress of service vehicles which is convenient and safe both for drivers and pedestrians;

7. Improper Use of Obscured Glazing

There is large use of obscured glazing throughout the site. To have one or two obscured windows in a property can be beneficial to residents and neighbours, but the wide scale use of obscured glazing in these proposals limits proper natural lighting, reasonable outlook, appropriate ventilation, and detracts significantly from the value of the amenity space provided in the form of terraces. This is contrary to policy HSG5 *(a) provides a satisfactory level of privacy, outlook and natural lighting with appropriate provision of private amenity space;*

For all the reasons stated above I hope that you will reject this application and encourage the developer to continue with their efforts to build a more suitable development on this site.