

DC/12/80997 : MIRIAM LODGE, 185 DARTMOUTH ROAD, LONDON, SE26 4RJ

I am writing on behalf of the Forest Hill Society regarding the above application for the construction of a part five/part six storey extension to the existing hostel at Miriam Lodge 185 Dartmouth Road SE26 to provide an additional 61 rooms.

The Forest Hill Society are the local amenity society for the area covered by SE23 and have around 400 members. The society is keen to ensure that the area develops in a positive way that supports the economic, environmental and social well-being of 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.

We write to object to the above proposals for the following reasons:

1. Physical Impact of the Proposed Development

This six storey development is close to neighbouring gardens and to neighbouring flats. In particular there will be windows directly facing Moore House which is approximately 20 metres from the six storey section. This would result in direct overlooking to a number of flats.

Miriam Lodge is already a dominant building in the area, being significantly higher than any surrounding properties and the addition of a six storey extension only increases this dominance to the detriment of the character of the area. This includes the Sydenham Park conservation area which has a boundary with this property, and although it may not be particularly dominant from the street, it would be from Trinity Path, which is an important community hub in this conservation area.

For these reasons we believe that this application is contrary to policies HSG4, HSG5, HSG8, URB16 and HSG12 if appropriate for this 'residential extension'.

2. Impact on Crime and Anti-Social Behaviour

There is significant concern regarding crime and anti-social behaviour relating to the existing development of 125 units, and there is nothing in this application to allay fears that with a 50% increase in units that this problem will get worse rather than improve.

There have been a large number of comments from neighbouring roads relating to anti-social behaviour from residents of this hostel. Police and noise enforcement officers have been called on a number of occasions but with little impact, as a result many such occurrences go unreported and unrecorded, but I would urge officers not to dismiss these claims by local residents.

In the March 2012 meeting of the Forest Hill Ward Safer Neighbourhoods Team the issue of crime and anti-social behaviour from Miriam Lodge was raised:

*[Sergeant Ferguson] Explained to the panel that there has been a total of 90 offences committed on the Forest Hill ward since the beginning of January 2012. **It was then explained that a large proportion of these offences were believed to be linked to Miriam Lodge. SF went on to say that unfortunately Miriam Lodge is still a crime generator, SF then stated that the team are aware of who are committing the offences and are being stopped/searched at every suitable opportunity.***

It is unfortunately reasonable to assume that there will be an increase in crime if Miriam Lodge is increased in size. This is a threat to local residents and to users of our high streets in Kirkdale and Dartmouth Road.

We recognise that hostels for homeless people are an important amenity in our city, but the concentration of so many units in a single site is a serious concern to many residents living in the area.

The hostel is not used by Lewisham council but is used by a number of other London councils, we feel that increased hostel provision should be allocated to a borough where there clearly is not enough provision rather than creating a larger problem in Forest Hill.

We believe that this proposal should be rejected as not meeting the objectives of policies HSG4, HSG15 and

URB4.

We would ask that additional information is provided to the planning department and to local residents when considering this application. There have been suggestions that Miriam Lodge is used, in part, as a Bail Hostel. In pre-application discussions Mr Lanyon-Hogg expressed his concern at such suggestions (see appendix 6 of the Community Impact Assessment). To clarify this situation we would ask for recent figures relating to the residents:

- a. How many have been charged with a criminal offence and are awaiting trial.
- b. How many have previous criminal records.

3. Internal Overlooking

The proposed extension is just 2.5 metres from the existing block and will present three units on each floor of the existing block with a blank wall opposite their only windows. This will give the residents of the affected units an appalling outlook and will greatly reduce the amount of daylight to the units.

In the calculations for Average Daylight Factor for the existing units that will face the new extension (Appendix 2 of the Light Report), 2 units were identified as failing to reach the minimum recommendation of 1.5. We reject the report's claim that these *failings "should be read in the context of the overwhelming number of units that would retain ADF in excess of this figure"* (s. 3.6.2). The residential units are single-room dwellings and therefore having a high level of daylight in each room is of great importance.

In addition, the use of ADF to calculate a pass or fail of a minimum standard does not take into account the size of the reduction of daylight from the existing level. Of the six units assessed which passed the minimum recommendation, the reduced values range from 30% to 67% of the existing values.

We also note that the drawing of the proposed extension in the Light Report is different to the drawing in the main plans. The drawing in the Light Report shows the proposed extension, on its eastern side, completely obscuring one unit on each floor and part of the unit next to it, whereas the drawing in the main plans shows the extension completely obscuring both units. Which drawing was used for the daylight calculations? Are the calculations correct as per the layout in the main plans?

In addition to the units with limited daylight and poor outlook, there will be a number of other rooms that will be overlooked by rooms in the new block, and vice versa.

This layout is contrary to policy HSG5 by providing poor level of privacy, outlook and natural lighting, and is contrary to policy HSG12 as there is an appreciable loss of privacy and amenity (including sunlight and daylight) for residents in a number of units in Miriam Lodge.

4. Density of the Proposed Development

The standard London Density Matrix for residential development is shown below. Although not specifically intended for hostels or halls of residents but for units averaging more than 2.7 hr/unit, it does provide a useful benchmark for residential development.

The size of the site is given as 0.44ha, with 125 units this is equal to a density of over 284 units/ha, at the proposed 186 units this has a density over 422 units/ha. This is well in excess of any guidance for urban locations, even with a high PTAL rating. This is a good indication that the proposed density levels are far in excess of those expected in this location. For this reason we believe that the development is contrary to the London Plan density guidance and is overdevelopment of this site.

5. Loss of Amenity Space

Most of the additional accommodation is provided on the area currently available as a garden for residents. This substantial loss of amenity space, while increasing the density by 50% is inappropriate for this site. This is contrary to policies HSG5 and HSG12.

6. Requirement for Local Meeting

We believe that the nature of this development and the serious concerns expressed by neighbours, mean that a local meeting is appropriate so that the developer can meet with local residents to fully understand

their concerns and to allow for the existing issues to be recorded for the proper analysis of this development and the adverse impact it will have for neighbours and the wider community.

In conclusion, it is clear that this development is inappropriate for this location and does not meet a large number of local and regional planning policies shown below.

Policy References:

HSG 4 Residential Amenity

The Council will seek to improve and safeguard the character and amenities of residential areas throughout the Borough by:

(a) ensuring that new dwellings and high buildings are sited appropriately;
resisting the siting of incompatible development in or close to residential areas and dealing with existing uses that create a nuisance;

HSG 5 Layout and Design of New Residential Development

The Council expects all new residential development to be attractive, to be neighbourly and to meet the functional requirements of its future inhabitants. The Council will, therefore, only permit new residential development which:

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

HSG 8 Backland and In-fill Development

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

HSG 12 Residential Extensions

The Council expects residential extensions to be attractive, to be neighbourly and to meet the functional requirements of their future inhabitants. It will, therefore, only permit extensions which:

(a) retain a readily accessible, secure, private and useable external space for recreational and domestic purposes;
(b) do not result in an appreciable loss of privacy and amenity (including sunlight and daylight) for adjoining houses and their back gardens;

HSG 15 Creating Viable and Balanced Communities

Where affordable housing is considered appropriate as part of a residential development but where the site falls within an area which has existing high concentrations of social rented housing, the Council will seek, in agreement with developers, for the affordable housing contribution to be provided in a way which assists in securing a more balanced social mix within that locality in order to establish and sustain 'viable balanced communities'. This may take the part of more flexible tenures including 'part ownership' and other shared equity schemes or other type of arrangement as considered appropriate.

URB 4 Designing out Crime

The Council will require all development to be designed to provide and improve safety and a secure environment. ...

Reasons

The Council intends to use all its available powers to maintain Lewisham as an inner London borough with a low overall crime rate. Crime and personal safety are important issues for local people and the Council recognises that thoughtful design can do a great deal to reduce both the opportunity for and fear of crime. This applies to new housing development, offices and public facilities such as transport interchanges and stations.

URB 16 New Development, Changes of Use and Alterations to Buildings in Conservation Areas

The Council, having paid special attention to the desirability of preserving or enhancing the special architectural or historic character or appearance of its Conservation Areas....

In carrying out this Policy the Council will:

(d) resist development adjacent to a Conservation Area which has a negative impact on the character or appearance of that area;

London Plan Density Matrix

Table 3A.2 Density matrix (habitable rooms and dwellings per hectare)

	Setting	Public Transport Accessibility Level (PTAL)		
		0 to 1	2 to 3	4 to 6
Indicative Average Dwellings size	Suburban	150 - 200 hr/ha	150 - 250 hr/ha	200 - 350 hr/ha
	3.8 - 4.6 hr/unit	35 - 55 u/ha	35 - 65 u/ha	45 - 90 u/ha
	3.1 - 3.7 hr/unit	40 - 65 u/ha	40 - 80 u/ha	55 - 115 u/ha
	2.7 - 3.0 hr/unit	50 - 75 u/ha	50 - 95 u/ha	70 - 130 u/ha
	Urban	150 - 250 hr/ha	200 - 450 hr/ha	200 - 700 hr/ha
	3.8 - 4.6 hr/unit	35 - 65 u/ha	45 - 120 u/ha	45 - 185 u/ha
	3.1 - 3.7 hr/unit	40 - 80 u/ha	55 - 145 u/ha	55 - 225 u/ha
	2.7 - 3.0 hr/unit	50 - 95 u/ha	70 - 170 u/ha	70 - 260 u/ha
	Central	150 - 300 hr/ha	300 - 650 hr/ha	650 - 1100 hr/ha
	3.8 - 4.6 hr/unit	35 - 80 u/ha	65 - 170 u/ha	140 - 290 u/ha
	3.1 - 3.7 hr/unit	40 - 100 u/ha	80 - 210 u/ha	175 - 355 u/ha
	2.7 - 3.0 hr/unit	50 - 110 u/ha	100 - 240 u/ha	215 - 405 u/ha

Source: Greater London Authority