



15th August 2009

Re: Application DC/09/71953, Land Rear of 39-53 Honor Oak Road and, 15-17a Tyson Road

Dear Mr. Corrigan,

On behalf of the Forest Hill Society I wish to object to this planning application.

1) Previous Applications

This plan is very similar to the previously plan 08/70207 rejected in 2008 and DC/06/63803 which was rejected in 2007. We believe that the council should reject this new plan for some of the same reasons as well as some new reasons that result from this latest application.

Referring to the **rejection of 08/70207** there were three reasons for the rejection of the development that continue to apply to this application:

a. Lifetime Home Standards

The development, by reason of the poorly situated car parking areas and failure to provide 100% properties to lifetime home standards, would represent a poor standard of residential accommodation to the detriment of future occupants, contrary to policy 3A.5 of the London Plan February 2008 and policies HSG 5 Layout and Design of New Residential Development and URB 4 Designing Out Crime of the Councils adopted Unitary Development Plan (July 2004).

b. Out of scale with neighbouring properties and poor layout

The development, by reason of its layout, height, design, as well as loss of trees, which screen the development from its surroundings, would fail to complement or be compatible with the scale and character of the surrounding environment, resulting in an un-neighbourly form of development, contrary to policies URB 3 Urban Design, HSG 5 Layout and Design of New Residential Development and HSG 8 Backland and Infill Development of the Councils adopted Unitary Development Plan (July 2004).

c. Affordable Housing

The quantum of affordable housing proposed is insufficient to meet the Council's housing needs and fails to meet the 50% provision as required under Policy 3A.9 of the London Plan, February 2008.

Referring to the **rejection of DC/06/63803** there were three reasons for the rejection of the development that continue to apply to this application:

a. Overdevelopment

The proposal is considered to be an overdevelopment of the site, which is manifested through an inappropriately high residential density, bulky and poorly sited buildings, the loss of protected trees and a potential impact on the protected trees that would remain. It is therefore contrary to Policies URB 3 Urban Design, URB 13 Trees, HSG 4 Residential Amenity, HSG 5 Layout and

Design of New Residential Development and HSG 16 Density in the adopted Unitary Development Plan (July 2004).

b. **Out of scale with neighbouring properties and a sense of enclosure**

The proposal does not reflect the existing character of the surrounding area and as a result it is out of scale with neighbouring buildings, resulting in conditions detrimental to amenity within the proposal, and to adjoining properties. There is a poor outlook from, and sense of enclosure to adjoining properties and a poor internal environment resulting from the siting and mass of the proposed buildings. As a result the scheme does not comply with Policies URB 3 Urban Design, HSG 4 Residential Amenity, HSG 5 Layout and Design of New Residential Development in the adopted Unitary Development Plan (July 2004).

c. **Design and detail of properties on Tyson Road**

The proposed buildings on Tyson Road are poorly designed and detailed, and relate poorly to their neighbours. The proposal does not comply with Policies URB 3 Urban Design, HSG 4 Residential Amenity, HSG 5 Layout and Design of New Residential Development in the adopted Unitary Development Plan (July 2004).

2) Accessibility and lifetime home compliance

Block 1 has a disabled parking bay but the only entry and exit point from this car park is through a gate within the vehicles' gate. The disabled parking bay is located at the furthest point from this gate and to enter the building, residents must then cross the entry ramp to the pavement - and in the case of disabled residents or parents with buggies - go round to the side of the building and up two ramps. This does not appear to be an appropriate access and fails to comply with lifetime homes standards and basic accessibility.

Blocks 3, 4, 6, 7, 8, and 9 do not have internal lifts, which only appear to be present in blocks 1,2,and 5. Although lifts are not necessarily required to meet lifetime homes standards, it should be noted that block 6 has parking space for disabled residents but no internal lift, only an external lift to ground floor level.

Block 3 does not have a lift **or stairs** from the car park, although it would be possible for residents to use the lift in block 2, come out of that block and into their own block with no lift. This is poor design and accessibility.

For these reasons we reject the claim made in section 6.2 of the planning statement that claims '100% lifetime homes'.

This level of inaccessibility is **contrary to council policy HSG 5 e)** "*... provides physical accessibility for all members of the community including people with disabilities.*" and contrary to **policy 3A.5** of the London Plan.

3) Vehicle access to block 6

Parking for block 6 can only be accessed through three electronic gates, leading in and then out of block 5 before entering block 6, with corners and gradients to negotiate along the route. This will be a slow route for users and may result in damage to vehicles trying to negotiate gates, corners, and gradients. We do not believe this is a good layout of the site and results in poor access and is contrary to policy **HSG 5** and **HSG 8 d)**.

4) Vehicle access to block 7

Block 7 has no vehicle access, with the nearest road approximately 50 meters from the block. This block is furthest from the entrance to the site and is therefore the least suitable block to have no vehicle access. We would like to clarify if any parking will be made available for residents in this block, presumably either in block 6, with poor accessibility itself, or in block 3, which has no direct

paths to block 7. This is the wrong part of the site to designate units with no cars and is therefore contrary to policy **HSG 5** and **HSG 8 d**).

5) Bad Internal Layout

There are a total of 12 flats which have bedrooms which are directly adjacent to kitchens or kitchen/living rooms. We believe this to be poor layout which will create noise problems for residents. There are no bathrooms which have windows to provide natural ventilation, even when they are located with external walls. This is not environmentally friendly as it will lead to the use of mechanical ventilation in every flat rather than a simple natural solution.

Flat layout plans do not conform to good practice and particularly not the Mayor Of London's new guidance on housing standards (which has not yet been formally been adopted but is being used by many Boroughs as an indicator of good practice). The living room/kitchen/lounge combination in one small room is particularly unworkable.

6) Isolated and confusing entrances to blocks 8&9

Blocks 8 and 9 both have entrances from three sides for the flats on the ground floor and upper floors. This will create confusion for visitors, particularly in accessing the unit to the rear of block 8, where the entrance faces directly away from the access road. The unit to the rear of block 9 has another entrance that is not visible from Tyson Road or when approaching the block on the access road. In addition the entrance is located very close the main bin storage and collection point for the two blocks, which is not a pleasant approach to the flat. This is another example of bad layout for this development due to overdevelopment.

7) Reduction of green space

Whilst we welcome the decision to conserve all trees with preservation orders, something that the developer had previously argued was not possible, we continue to be concerned about the significant loss of tree and meadow environment.

This application results in the removal of diversity of habitat for invertebrates that provide an attraction for bats and for birds. The site currently comprises meadows, shrubs, and large trees, all in close proximity. Over development of this site means that it will have less value to bats and birds in the local area. The preservation of some aspects of the current environment does little to off-set to diversity available to wildlife on the site. After development only a minority of the currently green area will not be built on or paved over. The green spaces that are left will be on roofs, separated by roads and paths, or squeezed between large buildings, as a result the green space will be left disjointed .

For these reasons the application is contrary to **policy HSG8 f**) *"there should be no appreciable loss of wildlife habitat"*. And the further notes which indicate that: *"The Borough's back gardens are an important biodiversity resource. Where such gardens provide the best habitat within the nearby area they should be conserved. Particular importance will be attached to those gardens (or blocks) with a good range of habitats provided by such characteristics as woodland, trees, shrubs, dead wood, borders, hedgerows, climbers, long and short grassland and water features."* If this paragraph is to mean anything in terms of planning guidance, this development on such a special site must be rejected.

8) Crime Prevention

Gating to the undercroft parking is important and has been included in the latest designs. We would ask that the council confirm that all pedestrian access to the undercroft areas is secured at all times, and we would like to see the inclusion of a report from the local crime prevention officer / safer neighbourhoods team so that any additional issues are brought to the attention of the council. Tyson Road has been recognised as an area of concern to the local safer neighbourhoods team. Local residents need assurance that this development will in no way increase crime levels in the immediate vicinity.

9) Visitors' Parking

We would like further details of the on-site provision of visitors' parking. With the gating of all the undercroft parking and less car parking spaces than there are apartments, there is now a real potential for parking problems to develop on Tyson Road. The problems of parking on Tyson Road are not limited to visitors but will also result from families with more than one car and without two car parking spaces, and the lack of car parking facilities for all apartments. We believe that for a development of this size provision should be made on-site for visitors and overflow parking.

10) Family Gardens

With 12 three bedroom apartments the needs of families need to be taken into account. **Council policy HSG 7** states that "*Family dwellings should be provided with their own private garden area. Normally, a minimum garden depth of 9 metres will be required*". It appears that, with the exception of a single ground floor flat, that no such provision has been made in this development.

11) Shared Gardens

There are no fences around any of the proposed communal garden areas. This is contrary to **policy HSG 7** which states that "*A communal garden should be securely fenced and the public should not have access to this space*".

12) Location of Family Accommodation

Two of the three-bedroom units are located at the top of blocks without lift access. In block 1 this is located on the third floor and in block 6 located on the 2nd floor. It is unsuitable for family dwellings to be located at the top of 2-3 flights of stairs (plus another flight from the car parking) and is likely to result in these three bedroom properties not being used by families as intended.

13) Overlooking

We feel it is right to recognised that the developer has put a great deal of effort into reducing overlooking, especially in option 2. Option 1 in particular has overlooking problems for 52 Honor Oak Road, and blocks 3 and 7 overlook Montgomery Mews, Fairlie Gardens and Dunoon Road. Although some trees will act as screening during the summer, they will not provide sufficient screening in the winter.

By reducing overlooking the developer has created a number of units with extremely limited daylight and a number of units which will only have views of other block in the development located extremely close by – specifically units in blocks 3 and 4. We feel that this results in poor internal layout and is contrary to **policy HSG 5 (a)** which states that '*The Council will, therefore, only permit new residential development which: provides a satisfactory level of privacy, outlook and natural lighting with appropriate provision of private amenity space*'.

14) Character of Tyson Road

The proposed blocks on Tyson Road, as with the previous applications, do not fit well with the neighbouring properties, their shape and timber frontage do nothing to preserve the character of the houses that will be demolished which form part of a line of similar houses. This is contrary to policies URB 3 and HSG 5.

15) Density

The density of this development is 217 habitable rooms per hectare (reduced to 204 hr/ha) in option 2. Option 1 is higher than the range recommended by Lewisham Council in **policy HSG 16**, which states that "*New residential development should normally be built within a density range of 180 –210 habitable rooms per hectare*". The London plan does allow for higher densities for developments,

however, we believe that either of these density levels is unsuitable for this backland, suburban location.

By developing a backland site to such high density levels the developer has introduced a series of problems resulting in poor design and layout on this site which are detailed throughout this document. This is contrary to **policy HSG 8 (sections b-f)**.

16) Flood Risk

The flood risk assessment document accompanying this application raises concerns about the level of surface water run off from this development during peak flooding events. At present this site acts as an important area for soaking up surface water, with 125 trees benefiting from this water resource. Other developments in the surrounding area have already put pressure on the surface water run off in the area resulting in reported problems in Dunoon Road and Fairlie Gardens.

Unlike the previous application of 2008, there does not appear to be any water attenuation on the site to provide temporary storage of surface rainwater prior to disposal in the public sewer system.

Because of the risk of flooding to the east of the site and the reduction of flood prevention measures, the proposals are contrary to **Policies URB 12** Landscape and Development and **ENV.PRO 15** Sustainable Surface Water Drainage in New Development.

17) Affordable Housing

The current application includes 36% social and intermediate housing. This is significantly below the 50% provision as required under **Policy 3A.9** of the London Plan. If developments of this scale do not exceed the older target of 35% then there is little hope of Lewisham meeting the 50% affordable housing target for new developments. This was one of the grounds for rejecting the last application and we hope that this will continue to apply to the latest development.

We would ask that particular consideration is given to the proposed mix of social and market housing in relation to accessibility and ask the council to make sure that **policy HSG 5 d)** is observed, so that it is not the social housing that is overwhelmingly inaccessible and without parking provision.

18) Local Meeting

There are a number of points that we hope that the developer can explain in further detail to local residents at a local meeting and take on board the feelings of local residents that 67-71 flats in this location is over-development. The last application received 304 letters of objection, showing the concerns of huge numbers of local residents, with such public interest in this development it is right to have a local meeting to discuss the proposals before they go to the planning committee. This meeting should be open to objectors and other local residents who may not have been able to object due to the timing of this proposal during the school holidays.

Many thanks for taking account of the view of the Forest Hill Society which we are sure are shared by the overwhelming majority of our 400 members. We believe that for the reasons stated above it is clear that the latest application for this site fails to meet with a number of Lewisham Council and Regional policies and must be rejected, just as the previous applications were rejected.

Regards,
Michael Abrahams
Vice Chairman, Forest Hill Society