

Committee	PLANNING COMMITTEE (A)	
Report Title	28 Sydenham Hill, SE26	
Ward	Forest Hill	
Contributors	Geoff Whittington	
Class	PART 1	19 October 2017

Reg. Nos. DC/15/094733

Application dated 28.11.2015

Applicant Abbeyfield Housing Society

Proposal Demolition of Hill House, 28a Sydenham Hill SE26, the change of use, alteration and extension to Highfield, 28 Sydenham Hill including the formation of front and rear lightwells, together with the construction of a part/ two, part/ three, part/ four, part/ five-storey building, to provide 40 self-contained 'Extra Care' home units comprising 19, two bedroom and 21, one bedroom flats, with the provision of 7 car parking spaces, cycle parking and associated landscaping.

Applicant's Plan Nos P01, P02, P03, P04, 05, P06, 07, P08 Rev A, P09, P10, P11, P12, P13, P14, E01, E02, E03, Site Plan, Block Plan, Impact on trees Report, Design & Access Statement, Transport Statement, Area Appraisal – conservation supporting information, Energy & Sustainability Statement, Planning Statement, Statement of public consultation received 28 November 2015; P15, Travel Plan Rev A Received 5 December 2015.

Parking Survey Received 5 June 2017

Background Papers

- (1) Case File LE/345/28/TP
- (2) Local Development Framework Documents
- (3) The London Plan (2016)
- (4) The NPPF

Designation Core Strategy – Area of stability and managed change.

## **1.0 Property/Site Description**

- 1.1 The site is located on the south side of Sydenham Hill, lying opposite the borough boundary with LB Southwark. The site, which measures 0.19 Hectares, is currently occupied by a 3-storey plus roof space 1980s building (Hill House) located centrally within the site that was formerly in use as a care home for the elderly prior to its closure in 2014.
- 1.2 The detached building to the front of the site known as Highfield is a classically styled, locally listed building of the mid-19<sup>th</sup> century, which has been unoccupied since 2010. Although the Victorian Villa now stands isolated among dominant modern buildings, it is an important reminder of the earlier pattern of development on Sydenham Hill.
- 1.3 The northern part of the site is flat, before sloping considerably toward the southern end. Existing perimeter trees are located to the front half of the site, whilst there is denser tree coverage to the rear.
- 1.4 The surrounding area is predominantly residential in character. To the west of the site is Droitwich Close, which is comprised of 3-storey blocks of flats. To the east are 3-storey flats (Porlock House), whilst to the south is a 5-storey block of flats (Greyfriars).
- 1.5 To the south-east is a 6-storey building accommodating flats (Wirrall House), and to the south-west is a 2-storey house. Directly to the north of the application site are 2-storey dwelling-houses lying within the London Borough of Southwark, bounded by an 8-storey block of flats and villa style properties.
- 1.6 The nearest local amenity is a public house to the west of the site on Crescent Wood Road, whilst the nearest retail store is located on Wells Park Road.
- 1.7 The only existing vehicular access into the application site is from Sydenham Hill. The site is served by two local bus routes, providing direct links to Sydenham and Crystal Palace. The site has a PTAL rating of 2 on a scale of 1-6, where 1 indicates poor access to public transport.
- 1.8 The site is not located within a conservation area, however it falls within a designated 'Area of Special Character'.

## **2.0 Background**

- 2.1 An application was submitted to the Council on 28 November 2015 proposing the demolition of the existing building known as Hill House, and the construction of a 40 unit Extra-Care home development that would provide specialist dementia care services for older people. The existing locally listed building, Highfield, would be retained and converted as part of the proposal.
- 2.2 Officers raised significant concerns toward the scale of the proposed development, and advised the applicant it would be refused permission under delegated authority. Subsequently, a local ward Councillor requested the application be determined at a planning committee.

2.3 On 30 March 2017, the proposal was presented to Committee A with a recommendation to refuse permission for the following reasons:

- 1) The proposal, by reason of excessive scale, height, bulk and massing would represent a significant over-development of the site, appearing as an overbearing and discordant form of development that would disrupt the established building form, and harm the designated 'Areas of Special Character', contrary to Policy 15 (High quality design for Lewisham), DM Policy 32 (Housing design, layout and space standards), DM Policy 33 (Development on infill sites, backland sites, back gardens and amenity areas) and DM Policy 37 (Non designated heritage assets including locally listed buildings, areas of special local character and areas of archaeological interest) of the Development Management Local Plan (2014).
- 2) The proposed building would fail to respect or be sympathetic to the historic character and prominence of the locally listed building, resulting in a poor relationship that would compromise the setting of Highfield and existing streetscape, contrary to Policy 15 (High quality design for Lewisham), DM Policy 30 (Urban design and local character) and DM Policy 36 (New development, changes of use and alterations affecting designated heritage assets and their setting: conservation areas, listed buildings, schedule of ancient monuments and registered parks and gardens) of the Development Management Local Plan (2014).
- 3) The proposed development, by reason of siting, scale and massing, would result in adverse harm upon the setting of Droitwich Close, appearing as an overbearing and incongruous introduction that would overshadow the existing amenity space and impair outlook to occupiers, contrary to Objective 10: Protect & Enhance Lewisham's Character & Policy 15: High Quality Design for Lewisham of the adopted Core Strategy (June 2011), and DM Policy 32 Housing design, layout and space standards and DM Policy 33 (Development on infill sites, backland sites, back gardens and amenity areas) of the Development Management Local Plan (2014).
- 4) The proposed standard of residential accommodation would be compromised significantly by virtue of the dense and overbearing scale and layout of the building that would result in sense of enclosure, overshadowing and poor outlook to some units and the communal garden area, contrary to Policy 32 (Housing design, layout and space standards) of the Development Management Local Plan (2014).
- 5) The proposal, by reason of insufficient provision of off-street parking, and the likely demand attributed to the nature of the use, would result in potential increased parking to neighbouring streets, contrary to DM Policy 29 (Car parking) of the Development Management Local Plan (November 2014).

2.4 Members motioned to defer a decision to enable the submission of further information, including the undertaking of a parking survey and justification for the 40 units, whilst allowing officers an opportunity to negotiate improvements to the scheme.

- 2.5 In response, the applicants have submitted the following:
- Parking survey of the local area undertaken in May 2017.
  - A report setting out why the viability of the scheme is dependent upon the provision of 40 units. The report has been submitted as a confidential document for officers and Members to view only.
- 2.6 No further plans have been formally submitted that amends the scale or appearance of the proposed development.
- 2.7 A copy of the Committee Report from the 30<sup>th</sup> March 2017 is provided in Appendix A.

### **3.0 Current Planning Application**

- 3.1 The current application proposes the demolition of the existing care home building to the centre of the site, which has been unoccupied since 2014. The replacement building would vary in height between two and five storeys and would adjoin the existing locally listed Highfield building to the side and rear, whilst extending within close proximity of the western and southern boundaries of the site.
- 3.2 The development would provide 40 self-contained units comprising 19, two bedroom and 21, one bedroom flats. The proposal would create an extra care housing scheme incorporating specialist dementia care services for older people.
- 3.3 The facility would have associated communal facilities, including lounge/dining room, activity rooms, well-being suite and hairdressers. The central external area would be landscaped to form a communal garden for residents, measuring approximately 230sq.m.
- 3.4 Access to the building for residents would be through the existing locally listed building (Highfield), which would be converted to provide office space, a reception area, amenity rooms and residential accommodation. Lightwells would be formed to the front of the building, with a 'bridge' providing access to the entrance.
- 3.5 The building would be staffed 24 hours a day, with 12 full-time employees.
- 3.6 The existing vehicular access to the eastern side of the development would be retained, with 3 parking spaces located at the rear, including 2 disabled bays. Four parking bays would be provided to the front of the site. A refuse store, and a cycle/buggy store would be located within an undercroft area to the front of the new building.
- 3.7 The predominant facing material of the proposed building would be stock brick, with extensive glazing to the western boundary. The elevation fronting Sydenham Hill would be of reconstructed limestone pre-cast panelling.
- 3.8 External driveway surfaces are proposed in concrete block paviors laid on a porous base. Existing driveway levels would be maintained to the east driveway to avoid ground disturbance in the tree root protection areas.

## **4.0 Planning History**

- 4.1 Planning permission was granted 16 October 1987 for the construction of a part two, part three storey plus roof space home for the elderly on land at the rear of Goodliffe House, comprising 25 residential units and two flats for staff together with the provision of 5 parking spaces and the erection of a paladin enclosure to the side.

## **5.0 Consultation**

- 5.1 This section outlines the consultation carried out by the Council following the submission of the application and summarises the responses received. The Council's consultation exceeded the minimum statutory requirements and those required by the Council's adopted Statement of Community Involvement.
- 5.2 Site Notices were displayed. Notification letters were sent to 163 properties, local ward councillors, ward councillors from the London Borough of Southwark and Southwark Council whose boundary lies opposite the site.

### Written Responses received from Local Residents and Organisations

- 5.3 Prior to the first Committee meeting, two letters and a petition with 7 signatures were received objecting to the proposal on the following grounds;

- (1) Overbearing form of development;
- (2) Overlooking from west facing balconies and windows toward Leamington Court;
- (3) Treatment of western façade – bris soleil is an inappropriate treatment, and would result in overlooking;
- (4) Loss of existing trees;
- (5) Poor contextual analysis undertaken with neighbouring buildings;
- (6) Inadequate parking provision.

- 5.4 Since the Committee (A) meeting, a further 3 letters of objection and a petition with 25 signatures have been received. This includes an objection from the Sydenham Society, who have stated:

'Whilst the Sydenham Society acknowledges the need for the specialist accommodation provided by Abbeyfield, in our view the development proposed is totally inappropriate in respect of its height, bulk, scale and massing and will not enhance the setting of the locally listed Highfield House. In addition, if permitted, this building, with its slab-like design, will have an entirely negative impact on an Area of Special Character, contrary to Lewisham's policy DM 37 which states that development in such areas should "sustain and enhance the characteristics that contribute to the special local spatial, architectural, townscape, landscape or archaeological distinctiveness of these areas".

'If permitted the damage done to the Area of Special Character will not only be at the front on Sydenham Hill – where there will, in effect, be a continuous built-up frontage – but also to the rear where demolition and the construction of a five-storey building will have a major impact on the remnants of the Great North Wood and westerly views towards the protected Sydenham Ridge.

'The Sydenham Society fully supports the planning case officer's reasons for refusing planning consent for this development as set out in section 10 of the report to Planning Committee A on 30 March 2017. In particular we share the concerns about Trees/Ecology detailed in the report at clauses 6.56-6.68 which encapsulate the alarming impact such a development – if permitted – could have on this part of Sydenham Hill.

'The Sydenham Society wishes to also record its support for the concerns of neighbours in the adjacent housing developments at Porlock House and Droitwich Close (comprising Leamington Court, Bath Court and Harrogate Court). The amenity and outlook of residents on both sides of the proposed new block will be severely compromised in terms of their outlook and ability to enjoy their homes. Currently residents of west-facing dwellings in Porlock House enjoy good levels of daylight and sunlight, and pleasant uninterrupted views. The proposed new development, if permitted, will be overbearing and unneighbourly, will lead to a sense of enclosure and will adversely reduce the light and views currently enjoyed by all residents.

'The Sydenham Society shares the residents' concerns about parking and supports the points made in the section of the report entitled "Highways and Traffic issues". Clauses 6.39-6.46 set out in detail concerns about the minimal level of off-street parking proposed (just 7 spaces), access arrangements (insufficient width for two-way vehicle movements) and poor sightlines for drivers along this part of Sydenham Hill.

'Residents have noted in their objections that Sydenham Hill is a relatively narrow road with mini roundabouts at both ends which are congested at peak times. From the west there are two bends in the road, the latter within 30 yards of this property. In the Society's view an increase in traffic movements at this location, with drivers reversing in and out or having to pause on Sydenham Hill before entering, will present a major hazard to road safety.

'The Sydenham Society supports the view of the planning case officer with regard to Design (clauses 6.8-6.17) and Standard of Accommodation (6.34-6.38). As described at 6.35 the configurations of the units in a proposed C-shape has resulted in long corridors which means that most of the rooms would be single aspect, limiting the range of outlook and the amount of daylight received; the lower level units facing the communal garden would be overshadowed by the height of the southern wing, resulting in a sense of enclosure and impaired outlook. At 6.37 there is a description of the communal garden, with which the Sydenham Society could not agree more. ('Its positioning below the established ground level, and proposed building heights surrounding it, would result in the amenity space being significantly overshadowed and enclosed. Considering the nature of the proposed tenure, the scheme should be seeking to provide residents with an outdoor setting they can enjoy and that enhances their well-being.')

(Letters are available to Members).

London Borough of Southwark Planning Department

5.5 No response.

Natural England

5.6 No response.

Thames Water

5.7 No response.

**Internal Responses**

Highways

5.8 Objections raised.

Environmental Health

5.9 No objections raised.

Tree Officer

5.10 The officer raises objections to the proposal.

Conservation Officer

5.11 Raises concerns to visual harm upon the character of the existing locally listed building.

Ecology

5.12 The Ecology officer noted there was no assessment or recognition of biodiversity, and no mitigation and/or enhancements proposed.

**6.0 Planning Considerations**

6.1 The main issues to be considered relate to the matters raised at Planning Committee A on 30 March 2017, which includes:

- a) Justification for 40 units;
- b) Improvements to the proposal;
- c) Highways and Traffic Issues.

Viability

6.2 The proposal includes 40 residential units comprised of 19, two-bedroom flats; and 21, one-bedroom flats, and would provide a specialist type of housing for dementia sufferers.

6.3 The applicant has advised that with regards to the operation of the property, the majority of extra care developments are occupied by single people, with approximately 20% of their residents living as couples. The Sydenham Hill scheme

has been designed to accommodate more couples, specifically where one member of the relationship is living with dementia. Couples would live together and care would be provided to the resident who needs it by staff on site, removing the burden of care from the more able partner. A suite would also be provided for any residents who wants a guest to stay but do not have the facilities within their own unit.

- 6.4 The applicants have advised that allocations would be via the Council's housing list, which together with the level of affordable housing and age criteria for the development would have been secured by planning obligation had permission been recommended.
- 6.5 The concerns relating to the overall scale of development is directly attributed to the number of residential units, which the applicants advised would be required to ensure the viability of the scheme. Members considered it appropriate therefore that the applicants should submit a Viability Report to the Council to justify the provision of 40 units.
- 6.6 A report undertaken by The Abbeyfield Society has been submitted which identifies Funding and construction; Build costs; Saleable and non-saleable floorspace; and Staffing as the main generators of significant costs for Extra Care schemes. The Report advises that in regard to build costs, Extra Care development would typically cost up to 13% greater than a new build 2-storey flatted building, due to the extra services required.
- 6.7 The Report advises 'we have assumed that the development will be 40 units as per the planning application; this was shown at the early stages to be the minimum scale for the development to operate as a fully affordable scheme. The architectural designs were then informed by this requirement.'
- 6.8 The applicant had originally proposed that all units would be affordable rented units, exceeding the target of 50% affordable in schemes of 10 units or more set by Core Strategy Policy 1, and to set rent levels for the units at 80% of market rent, in accordance with the Council's 'Affordable Rent Study: Market Research & Affordability Analysis (February 2014)'.
- 6.9 The Viability Report sets out five model scenarios for the scheme that were undertaken for between a range of 35 to 40 units, including either full affordable units; and mixed tenure affordable rents and shared ownership. The modelling assesses the capital cost; grant funding; income from the units; and expenditure including staffing costs and property operation costs.
- 6.10 The modelling was undertaken between April and June 2017, and the Report concludes that 'having reviewed the financial viability with current costs for construction and income, the full rental model for 40 units (which was originally proposed) has now proved to be unviable.'
- 6.11 The scheme has therefore been 'remodelled' to provide a mixed tenure of 30 affordable rent units (21, one bedroom and 9, two bedroom units), and 10 shared equity sales (10, two bedroom units) at 75% of market value. Subject to formal approval, the scheme would benefit from grant funding from the GLA equating to £51,000 per unit towards each affordable rent unit, and £30,000 for each shared ownership unit. Officers raise no concerns regarding the new proposed mix, given

that the majority will remain as affordable rent, and therefore in accordance with Core Strategy 1 for providing 50% affordable housing, subject to viability.

- 6.12 Whilst the Viability refers to the provision of 40 units being an early requirement, it does not explain how this figure was reached prior to the formal submission of the planning application. The Modelling process was conducted subsequent to the Planning Committee, however the initial process of determining the quantum of units does not form part of the Report.
- 6.13 The applicants have been consistent during the course of the planning process that the provision of 40 units cannot be reduced, and whilst the Viability appears to support their argument, officers do not consider this to be sufficient reason alone to justify such an over-development of this site and its context.

### Design

- 6.14 In response to the constraints of the development demonstrated in the Viability Report, the applicant has not proposed any amendments to the design that addresses the reasons recommended to refuse the application.
- 6.15 Officer concerns toward the scale of development are significant, and can only be addressed by an appropriate reduction in the number of units. In this case, maintaining the 40 units would result in the undertaking of only minor alterations to the building, which would be wholly ineffectual in achieving a policy compliant scheme. The applicant has acknowledged the difficulty in substantially reconfiguring the scheme that would maintain the desired 40 units, whilst overcoming the design concerns raised by officers and consultees.
- 6.16 This serves to confirm the limitations of the site, and the gross over-intensification that is proposed. The previous Committee report set out in detail the reasons why the proposal was considered to be unacceptable. This followed the undertaking of a thorough assessment of the scheme by officers, and the significant impacts upon neighbouring amenity, the locally listed Highfield building, and the character of the wider area.
- 6.17 Officers maintain no objections to the demolition of the existing Hill House, which is a relatively modern building, but one that is considered to have an appropriate relationship with the wider area due to its form, lower scale and height. In contrast, the scale and massing of the proposed building that would be up to 5-stories high, would be excessive and disproportionate to the size and nature of the site.
- 6.18 The inappropriate slab-like design and overall expanse of the building, coupled with a lack of elevational articulation is considered to contribute to the bulk and massing of the development, which in turn would serve to compound the harmful visual impact. The proposal would fail to preserve or create an urban form that contributes to local distinctiveness, which includes building features, roofscape and open space. It is therefore considered contrary to DM policies 30 and 37, and further conflicts with policy when considering its impact upon the character of the locally listed Highfield, and the designated Areas of special character.
- 6.19 Officers have identified other areas of concern that have been addressed in detail within the previous Committee report. The height and layout of the building would compromise the proposed standard of residential accommodation by impairing

outlook from some units, whilst resulting in limited natural light intake and sense of enclosure.

- 6.20 In addition, the communal courtyard area would feel enclosed and overshadowed by the height of the building and its positioning below the established ground level.
- 6.21 In regard to neighbouring amenity, there would be significant harm upon occupiers to the west of the site in Droitwich Close, with the excessive mass of the proposed building impairing their outlook and creating an overbearing sense of enclosure and overshadowing to their communal amenity space.
- 6.22 The consequence of retaining the quantum of units for viability purposes negates any opportunity to reduce the scale of proposed development that may address these concerns. Officers therefore maintain objections to the proposal and the resulting harm that would be contrary to DM Policies 15 'High quality design for Lewisham', 32 'Housing design, layout and space standards', 33 'Development on infill sites, backland sites, back gardens and amenity areas' and 37 'Non designated heritage assets including locally listed buildings, areas of special local character and areas of archaeological interest' of the Development Management Local Plan (2014).

#### Highways and Traffic Issues

- 6.23 The Highways officer advised prior to the March Committee that the proposed level of off-street parking (7 spaces) would be insufficient to accommodate the parking demand generated by the development, which would be on a 'first come, first served' basis for residents, 12 members of staff and visitors. The Transport Statement that accompanies the application did not include a parking survey to demonstrate that the overspill parking generated by the development could be suitably accommodated within surrounding streets.
- 6.24 Members requested that a parking survey be undertaken by the applicant to determine the potential impact. Subsequently, this was undertaken by Traffic Surveys UK Ltd and the on-site survey took place over two days on Tuesday 9th May 2017 and Thursday 10th May 2017.
- 6.25 The report concludes 'there are available on-street parking spaces at all times relevant for the project should the parking demand exceed the 7 spaces provided for within the scheme proposals.'
- 6.26 The Council's Highways officer has reviewed the parking survey information and agrees that the parking surveys do indicate there are locations on the streets surrounding the site where overspill parking from the development may be accommodated. However, whilst the locations identified currently are unrestricted (i.e. have no waiting restrictions or yellow lines), many of the locations in the parking survey (on Sydenham Hill and Droitwich Close) are considered undesirable because if parking took place in these unrestricted locations :-
1. It would have an impact in terms of the free flow of traffic by reducing the effective width of the carriageway;
  2. It would result in vehicles parking on footways, thereby impacting upon pedestrian movement;
  3. It would impact on visibility splays from vehicle crossovers.

- 6.27 When the locations where undesirable parking could take place are excluded from the survey results, the parking survey identifies that if the overspill parking from the proposed development occurs, it would result in an unacceptable level of parking stress in the streets surrounding the site.
- 6.28 Currently these locations identified in the parking survey (on Sydenham Hill and Droitwich Close) have no parking restrictions because undesirable parking does not take place.
- 6.29 In light of this, officers object to the proposal on grounds that it would serve to result in on-street parking pressures due to the insufficient provision of on-site parking.
- 6.30 This follows other Highways related concerns that are addressed in detail in the March 2017 Committee report, including;
- Unacceptable access arrangement/ layout for the proposed off-street parking would be unacceptable.
  - Poor intervisibility between the disabled parking spaces in the parking area to the rear of Highfield house (parking bays 5 & 6) and vehicles accessing the site from Sydenham Road, thereby increasing the potential for conflict and resulting in vehicles reversing out onto Sydenham Hill;
  - The layout for the parking area to the west of the site would also result in vehicles reversing out onto Sydenham Road, particularly parking bay 1.
  - The vehicle movements associated with the disabled parking space (bay 4) would be in close proximity to the front doors for the building, which increases the potential for conflict.
  - A swept path analysis is not provided for any of the parking areas/ spaces to demonstrate that all vehicles could access/ egress the site in forward gear.
  - The transport statement does not illustrate where service vehicles would load to service the site.
- 6.31 Given the issues outlined, and no reduction in scale or footprint of the building being possible, the proposal remains objectionable on Highways grounds, contrary to DM Policy 29 Car Parking.

## **7.0 Conclusion**

- 7.1 This application has been considered in the light of the relevant policies set out in the development plan and other material considerations including representations from third parties that have been discussed in the March 2017 report and this report.
- 7.2 Following a further assessment of the proposal and submission of additional information, officers maintain a strong objection to the proposal.
- 7.3 Whilst the principle of continued care provision upon the site is supported, officers consider this should not outweigh the adverse impact of the development. The overall scale and massing of the development would be excessive, failing to

respond positively to the application site or wider area, whilst impacting significantly upon neighbouring amenity.

- 7.4 The applicant demonstrates in the Viability Report that a reduction of units would result in the scheme being unviable, with 40 being the minimum provision. Subsequently, there would be no scope to reduce the scale and visual impact of the development.
- 7.5 Following an assessment of the Parking Survey, Highways officers maintain their objections toward the lack of on-site parking, and the subsequent overspill of vehicles associated with the care home parking in neighbouring streets.
- 7.6 The development would provide sub-standard residential accommodation, with poor outlook and sense of enclosure to some units, due to the height and form of the building.
- 7.7 The relationship with the existing locally listed building is poor, whereby the proposal would not correspond in any way to the architectural language or character of Highfield. The shape and form of the building would not be subordinate, whilst the undercroft is not an appropriate design response to this frontage, highlighting the incongruous nature of the proposal.
- 7.8 Finally, the felling of trees upon the site, and the potential harm to those remaining also raises concern, whilst officers consider the development would have a harmful impact upon the designated special character of the area.
- 7.9 For these reasons, officers recommend permission is refused.

## **8.0 RECOMMENDATION**

### **8.1 REFUSE PLANNING PERMISSION, for the following reasons:**

- 1) The proposal, by reason of excessive scale, height, bulk and massing would represent a significant over-development of the site, appearing as an overbearing and discordant form of development that would disrupt the established building form, and harm the designated 'Area of Special Character', contrary to DM Policy 15 'High quality design for Lewisham', DM Policy 32 'Housing design, layout and space standards', DM Policy 33 'Development on infill sites, backland sites, back gardens and amenity areas' and DM Policy 37 'Non designated heritage assets including locally listed buildings, areas of special local character and areas of archaeological interest' of the Development Management Local Plan (2014).
- 2) The proposed building would fail to respect or be sympathetic to the historic character and prominence of the local ly listed building, resulting in a poor relationship that would compromise the setting of Highfield and existing streetscape, contrary to Policy 15 'High quality design for Lewisham', DM Policy 30 'Urban design and local character' and DM Policy 37 'Non designated heritage assets including locally listed buildings, areas of special local character and areas of archaeological interest' of the Development Management Local Plan (2014).

- 3) The proposed development, by reason of siting, scale and massing, would result in adverse harm upon the setting of Droitwich Close, appearing as an overbearing and incongruous introduction that would overshadow the existing amenity space and impair outlook to occupiers, contrary to Objective 10: Protect & Enhance Lewisham's Character & Policy 15: 'High Quality Design for Lewisham' of the adopted Core Strategy (June 2011), and DM Policy 32 'Housing design, layout and space standards' and DM Policy 33 'Development on infill sites, backland sites, back gardens and amenity areas' of the Development Management Local Plan (2014).
- 4) The proposed standard of residential accommodation would be compromised significantly by virtue of the dense and overbearing scale and layout of the building that would result in poor outlook, sense of enclosure and overshadowing to some units and to the communal garden area, contrary to Policy 32 'Housing design, layout and space standards' of the Development Management Local Plan (2014).
- 5) The proposal, by reason of insufficient provision of off-street parking, and the likely demand attributed to the nature of the use, would result in potential for an unacceptable increase in parking stress to neighbouring streets, in addition to poor vehicular access and parking layout within the site, contrary to DM Policy 29 'Car parking' of the Development Management Local Plan (November 2014).

