Valentine Court – Objection Comments and Public Meeting Questions 27th July 2022

Q & A's	
Question	Applicant Response
Daylight and Sunlight Can you explain why the proposals deviate from the RICS guidelines as there are a considerable	Only habitable room windows required to be tested under BRE guidelines and so only 45 of the 989 windows tested
number of windows that do not meet guidelines to existing homes, particularly to habitable rooms i.e.	actually breach the guidelines. (4.5%).
16% of all windows within existing homes fail the VSC test, with 45 'habitable' rooms affected; 50%+ loss of winter sunlight to some homes; and 7.5% of	20 habitable rooms fall short of DD (3.6%). The tests are intended to be applied flexibly and need to
all rooms also fail the Daylight Distribution test?	be balanced against all material considerations.
	All windows tested meet the Sunlight recommendations. Where windows have lost some winter sunlight, the minimum recommendations are still met over the whole year and retained greater than 0.8 of before value.
Reduction in daylight and sunlight received by the existing flats within Valentine Court due to Block's A, C and D is too great. Other neighbouring properties on Perry Vale would be negatively	Some Valentine Court Flats do fall short of the BRE recommendations, but we consider the impact to be moderate.
impacted by Block B.	70% of the short falling windows retain a VSC in the mid- teens and the majority achieve a borderline before/after ratio result. Vast majority retain VSC of mid-teens
	Following a number of appeal decisions, it is generally accepted that for large schemes in cities or densely populated town centre locations, a retained Vertical Sky Component of in the mid-teens is acceptable.
	Those that do not achieve mid-teen figure, have a balcony above them.
	Perry Vale properties full compliant, with the exception of window 362, which we don't think is a habitable room. Regardless, retains a VSC of 16.1%.
How have you ensured that impact to daylight and sunlight have been minimised?	The scheme has been through several iterations and as the massing has been updated, some of the daylight and sunlight impacts have been alleviated.
	We have worked with the architects on the redesign to mitigate some of the worst affected properties and the scheme is now much more compliant than in previous versions.
Why do you believe this level of impact to be acceptable and how that has been judged as appropriate?	Looking at the retained values and the mitigating factors in the report, i.e. a lot of marginal shortfalls, some windows already affected by balconies and that most main living rooms are not affected, we consider that the proposed development will have a relatively low impact on the light received by neighbouring properties.
	For the Local Authority to decide against other material considerations.
Why were the consultation team not transparent with residents about the real impact of daylight and sunlight on their homes? They repeatedly confirmed they would meet guidelines over the last 2-3 years and not unreasonably impact existing residents.	It was confirmed during consultation that the final scheme had not been tested but initial results were positive. There are factors behind the results such as balconies overhanging etc that explain the results.
Can planning permission be granted, whilst my property is not meeting the requirement to daylight based on these plans?	The BRE guide states that its numerical guidelines should be interpreted flexibly since natural lighting is only one of many factors in site layout design. The tests are not strict pass/fail criteria, they are
(All windows with a requirement for daylight at 85 to 112 Valentine Court pass the Vertical Sky Component test, with the exception of windows 112 at Flat 91, 113 & 117 at Flat 90, 121 at Flat	recommendations but acknowledge that the context of the site can be taken into consideration.

89, 127 and 131 at Flat 88, 137 at Flat 87, 146 at	
Flat 85, 152 & 153 at Flat 86, 157 at Flat 98, 158	
at Flat 97, 163 at Flat 96, 168 & 173 at Flat 95,	
179 at Flat 94, 184 at Flat 92, 185 at Flat 93, 197	
at Flat 105, 198, 199 & 202 at Flat 104, 203 at Flat 103, 212 & 213 at Flat 102, 218 at Flat 101, 219 &	
223 at Flat 99 and 224 at Flat 100).	
Are trees being included within daylight / sunlight	Trees do not form part of Neighbouring light assessments.
assessments?	riees do not form part of Neighbouring light assessments.
Why is Right of Light not being considered?	Rights of Light are not a material planning consideration and so are not relevant to the topics being discussed
	during this meeting. What we're looking at is daylight and sunlight from the BRE Guide.
Privacy, Overlooking and Amenity	
The residents who are most affected by the significant loss of daylight and sunlight in to their 'habitable' rooms, also have to additionally suffer a considerable loss of privacy from the windows/balconies of proposed blocks C+D facing the habitable rooms of Block 61-72 and 73-84 with a short distance between them. The play spaces (PE01, PE02, PE07 and PE08) further impact this, as they are right outside the windows of their habitable rooms, partly at ground level.	The distances from the playspaces to the buildings range from 6m-14m. Play spaces have been spread across the site so will not be a single source of noise. There is no defensible planting currently but there will be in the proposal, so more privacy than there is currently
How have you ensured that overlooking and loss of privacy has been minimised, particularly by windows, balconies and the new play spaces?	
Playspace should not be outside the windows of the existing flats as it impacts their privacy.	
How have you considered both the loss of daylight and sunlight alongside the loss of privacy to existing homes, particularly when a home is unreasonably impacted by both?	Covered by the above responses.
Highways	
There are inconsistencies with the planning statement and further questioning relating to EV chargers - A key benefit mentioned during the consultation process was the introduction of EV	Following feedback from the public meeting and LBL highways, the electric charging proposals have been amended as follows:
chargers for existing residents. However, at this	No. of No. of Existing New
point only 1 active charger has been confirmed in a disabled space for 1 of the new homes. Can you	Charge spaces Residents Residents Points served
please confirm how many spaces will have active charging?	Twin2431Active431
	Twin61293Passive
	Singe0000Active </td
	Singe1210Passive </td
You mention passive chargers as if they have a benefit to residents. Can you confirm the process to change passive chargers to active chargers, so they can be used, and how demand for these is monitored so that chargers can be made active?	Residents will need to set up their own account to be able to access the charging point and Lewisham Homes will pay for electricity supply.
The plans appear to be based on parking permits being introduced within the estate, which is	It is intended that the new homes would be car-free.
not confirmed. Are the new homes confirmed to be car free? If so, what does this mean in practice and how is it enforced?	Subject to further S105 consultation, parking enforcement (permit parking system) would be implemented at the estate through Lewisham Council parking team. This would be on a first-come first-served basis for leaseholders and existing tenants only.

rev bor out fort a re	e Council have completed s105 consultation and are viewing comments, along with other estates in the rough. The council will update the community on the tcome and we are hoping to have more information in rthcoming weeks. Leases and tenancies will have it as
The proposals would result in an increase in traffic and parking issued that would be detrimental to the existing residents.	requirement that the new homes will not have access to rking on the estate except wheelchair homes and car ub provision will be paid for 2 years membership for the w homes residents. The impact from traffic and parking has been assessed in the Transport Assessment which has been submitted to be Council. The new parking survey has demonstrated a nilar level of parking takes place now compared to the rlier survey which suggests it is a reliable baseline.
Security	
The proposals do not appear to attempt to address Me existing ASB/Crime within the Valentine Court tea estate, discussing only the designing out of crime from the new buildings - how have you worked with the Police, ASB team and Housing officers to gain understand of the existing issues within the estate?	eetings have been held with the Lewisham Homes ASB am and housing team who have influenced and shape e scheme and have reviewed what the current issues e on the estate and resident feedback from 2020 about tate matters has fed into design proposals.
(sc rati sur	so the consultation raised some issues of ASB cooters using estate road as a race track). Part of the tionale for the location of the new blocks is to increase rveillance of the estate road and the open space.
the estate as a whole, and the wider community, that not just the new building?	wisham Homes cannot guarantee ASB reduction as at is not within any housing providers gift, but we can ow that we have taken on board comments by SBD ficer and natural surveillance improvements, improved hting, wayfinding, improvements to the Bampton Road te area to make that safer has been proposed, some w bin stores on the estate.
Review' did not take place for this proposal, which the ASB manager said it would? rev cor pro Sea the Jar three	is was actually the subject of a MP enquiry, estate sident FOI and complaint. A response has been ovided for this and the independent adjudicator has entified that there is no cause for issue. The ASB anager mentioned to one resident that target hardening views take place, however this was clarified as a mplaint response that for new builds this is through oject team meetings and also the meeting with the ecure by Design Officer. Meetings have been held with a housing management team and ASB team since nuary 20220 at the inception of the project and roughout design stages to ensure their input.
fobbed access to improve security. The current gate is never locked (although it used to be in the past) so it has become a shortcut for children walking to/from school and the wider community. Could you clarify what you are looking to do with this gate and outline what your vision is for how it will operate?	the gate and ASB issues were raised as a cause of ncern by some residents at the public consultation on a August 2021. This was also discussed with the SBD ficer. As a result of the feedback received, this has then taken into consideration in the design, with proved accessibility to the estate from Bampton Road th a new and improved well-lit entrance and with open lings rather than a wall as stated in the Design and cess statement. The operational arrangements of the te will be considered in more detail prior to the mpletion of the scheme with housing management d ASB team. We are aware that we want to ensure at any operational arrangements are not having a bstantial impact on service charges.
Block A poses a security risk to properties on Thi Gaynesford Road.	is point is addressed by the Secure by Design sponse. The building will follow the existing Valentine ock format and boundary treatment and we do not have y details of security incidents currently.

	A feasibility study has been undertaken for the application of PVs. Whilst any provision will be a positive one, the size of the array available will have a minimal percentage saving compared to other interventions, resulting in a long pay back period. Therefore efforts have been made in other areas. Firstly, the building fabric has been designed to be significantly beyond the minimum requirements, providing passive measures. Secondly the application of Air Source Heat Pumps providing a decarbonised (electric led) solution, future proofs the building. These interventions provide an estimated carbon saving of approximately 55% beyond the 2013 Building Regulations. The remaining Carbon emissions is offset via Carbon Offset Contributions, in line with the London Plan, resulting in a net zero development.
	When comparing a PV array providing an offset against gas fired heating system, the carbon emissions reductions are significant. However, when offsetting an electrical supply, which has a carbon emissions factor already approximately a third of that for gas, the impact is significantly lower.
	<i>Grey Water</i> These have not been applied. Essentially these systems capture semi-clean water such as rainwater and bath/shower water, clean and treat the water and recycle for non-drinking water applications such as flushing toilets and irrigation.
	As one can imagine this has high maintenance costs to maintain the outgoing water quality. These are also costly to implement, as essentially the drainage and water distribution systems are doubled.
	Instead of implementing this, other techniques have been employed. For example, low volume flush toilets, and low water flow shower and bath fittings will be specified, and drought resistant planting has been proposed. This results in the reduction of water consumption, rather than recycling of higher quantities which attract high maintenance costs.
Will you be offsetting the carbon emissions caused by the development?	Yes, Carbon Offset Contributions will be made, in line with the London Plan, resulting in 100% CO2 savings. The London Plan sets out a hierarchy for carbon emissions savings, with minimum carbon savings to be achieved at each stage. The scheme design betters these minimum targets at each stage, thereby minimising the CoC as far as feasible. As a result, the proposed development has been designed with the most cost effective solution. The scheme has not "just met the requirements" and settled for paying the CoCs, rather it has incorporated the most cost effective interventions to maximise the carbon savings, minimise the CoC, but not to such an excessive capital cost that would make the scheme unviable.
Construction Stage	
These proposals were started before COVID-19 impacted our daily lives, and these has since been a significant shift to home working - with many business permanently closing offices. How have the revised proposal taken this in to consideration, in terms of how construction and noise will be	Contractor to produce a Construction Management Plan setting out how the works will be carried out to minimise disruption. Inevitably there will be some noise. Planning conditions will stipulate when works can start and finish each day.
managed to ensure those working from home in existing homes can remain productive?	Lewisham Good Practice Guide for the Control of Pollution and Noise from Demolition and Construction sites is a requirement of the contract. The Contractor will

Perry Vale and the Christmas Estate Concernation	be a Considerate Contractor as part of a contract requirement and this is evaluated as part of the tender stage. To be open and honest in that there will be disruption, but we will mitigate where possible and pre warn residents of any significant impact. The development phasing of construction build out would be discussed with the community, with regular updates from a resident liaison officer on site and newsletters and the contractor would have a meet the contractor event with the community before, just as happened for the demolition works. The demolition works taking place already.
Perry Vale and the Christmas Estate Conservation	
Block A will significantly impact the appearance, and integrity of the conservation area and would be contrary to DM Policy 36.	The Heritage Statement prepared by Montagu Evans contains a thorough assessment of the character and appearance (significance) of the Perry Vale and Christmas Estate Conservation Area and the impact of the Proposed Development upon that significance, in line with national and local planning policy.
	It is recommended the document be read as a whole, although it summarises that the significance of the Conservation Area principally derives from it being a fine example of speculative Victorian/ early Edwardian residential development. The grade II listed Christ Church stands as the most prominent building within the local area and a placemaking feature, illustrating the importance of the area during the mid-late-19 th century.
	The Site is located to the south/south-west of the Conservation Area, situated beyond its southern boundary. It occupies land severely damaged during World War II and is currently occupied by a series of residential blocks of four storeys. Views to and from the Site from within the Conservation Area are extremely limited, comprising only glimpses through gaps across rear gardens.
	The Proposed Development has been informed by careful analysis of the Conservation Area. The design includes a material palette which seeks to draw on important architectural features, including the yellow stock brick seen throughout Perry Vale, whilst reinforcing the linear/ horizontal access decks, lintels and balconies of the existing building across the Site. Equally, the scale of development is informed by, and consistent with, existing buildings.
Landscaping and Ecology	In specific relation to Block A, the Proposed Development will correspond positively with the spatial arrangement of the existing buildings adjacent to the Site, following their building line. Illustrations contained within the Heritage Statement and the submitted Design and Access Statement demonstrate that, in our judgement, Block A would be congruent to the existing context and would have a very limited and neutral effect to the Conservation Area. The characteristics of the Conservation Area, including the robust and high-quality building frontages along residential streets of Gaynesford Road, Sunderland Road and Perry Vale, will not be affected by the Proposed Development, and appreciation of the historic importance of the area as a Victorian/ Edwardian speculative residential development of the late-19 th century will be preserved.
Landscaping and Ecology	
Lewisham Homes struggle to maintain the existing green spaces and it's not clear if these plans have been discussed with Green Services to see if this	Green services Manager and Maintenance Manager have been involved in review the proposals throughout the design stages. They have approved the proposed tree list

is something they are capable of looking after effectively. Can you confirm how this has been considered?	and the planting locations for the proposed new build development at Valentine court. They both had no objections to the species proposed to maintain. Levitt Bernstein are very experienced Landscape Architects, and would have taken into consideration the planting locations regarding proximity of buildings, street furniture etc.
How has the significant reduction in green space and mature trees been judged as appropriate?	The proposed development provides an opportunity to introduce infill development whilst enhancing the quality of the existing green spaces.
	The existing areas of green space extends to a total area of 10,332 sqm. Whilst the Proposed Scheme seeks to reprovide 6,940 sqm of green space. This does result in a slight reduction from that of the existing. However, opportunities for greening have been maximised whilst introducing new built form in isolated areas of the estate. This is demonstrated by the Urban Green Factor score for the Proposed Scheme which results in 0.946 and a 37.39% biodiversity gain on site. Both figures exceed the policy requirements.
	We acknowledge that there will be a loss of green open space, this is necessary to deliver the proposed infill development. The loss has been minimised to isolated areas and to ensure that the proposals deliver tangible benefits to the existing landscaping, greening opportunities have been maximised across the estate. In this instance, it is considered that the loss of green space meets the above policy requirements.
	Initially we looked at the brownfield areas as they were raised by residents through complaints that they were eye sores and ASB issues and the caretaking building was no longer required. On the walk about the estate residents of the estate in early 2020 stated that they felt some shared ownership would be of benefit and various options of other areas on the estate were considered and consulted upon to increase the number of affordable homes and provide the vast number of estate and highways improvements.
The landscape plans will have an impact on the Service Charges, particularly for green services – how have the ongoing maintenance costs been considered as part of the proposals, and was is the estimate for this?	Green services had had no objections to the species proposed. This is estimated and assessed by Rent & Service Charge Manager with the service charges review. Service charges won't be confirmed until we have completed the final design stage and its built. Generally, more properties on the estate mean that the maintenance costs are spread across a greater number of properties.
Will a new helm map be produced for the landscaping provision as part of the plans? These are used by Lewisham Homes to work out the cost for maintain green spaces.	Green services Manager and Maintenance Manager and Service Charge Manager have been involved throughout the scheme development and will continue to be involved through the next stages. The proposals are approved by these teams.
Much used amenity space will not be accessible for the duration of the construction period.	Some amenity space will be available and some play space throughout development and once a contractor is appointed then they will provide more detail to the community in the Meet the Contractor event on this. The contractor will also liaise with the green services team regarding amenity maintenance during construction. We would refer back to the outline CEMP for guidance. The aim of the Construction Environmental Management Plan (CEMP) is to set out the responsibilities with regard to compliance with legislation and to implement any mitigation measures. This CEMP details management measures to minimise environmental impact from the construction phase of the development.

Playspace has been reduced and should not be broken up into small areas as will be harder to supervise children.	The proposal offers a total of 620m2 of play for under 5s, for the existing and new residents, which exceeds the requirement . Also, 591m2 of play are provided for 5-11 year old children. Play for the 12+ children is provided off- site. Additional play opportunities, in the form of incidental play and playable landscapes are included in the proposal (green mounds, felled trees etc.). The play provision exceeds the existing 280m2 of play, which is currently provided in the estate.
The Preliminary Bat Roost Assessment (PRA) was conducted in February 2022 and no further up to date surveying was completed. The Habitat survey should have covered from spring to late summer to cover the number of later species. Can you please explain why was this not done?	A PRA can be conducted at any time of year since we are looking for potential roost features not actual roosts. Had we spotted any features we would have recommended activity surveys during May-September, or hibernation surveys during winter.
The report also makes no mention of the Swifts that live in the estate during the summer months and the 4 nest boxes attached to the existing blocks that home them. These were installed by Lewisham Homes Breyer Group and Lewisham Swifts in 2017 during the last major works. Can you please explain why these were omitted? They should be considered as part of the proposals.	Signs of swift nests were not seen during the surveys (we didn't survey at nesting times but they would usually build nests in the areas we survey for bats and there would likely be evidence of last years'.) AGB Environmental have recommended nesting bird surveys before works commence (as all nesting birds are protected by law).
Light Pollution will be caused by the new buildings.	Lighting proposals have been designed to complement existing lighting and considered in the context of on site ecological impacts. An external lighting design statement has been submitted which outlines how the proposals will meet relevant guidelines.
Trees	
Large well-established trees should not be removed for the purposes of development during	Tree loss has been minimised to 5 trees being removed as follows:
a climate emergency, Particularly T33, and their removal will reduce privacy.	T19: to allow development (Cat B) T20: to allow development (Cat B) T29: poor condition (Cat U) T33: to allow development (Cat B) T46: to allow development (Cat C)
	None of these are Category A trees. Whilst there will be some removed, 33 new trees will be planted across the site.
Protected trees along the rear boundary of 2-12 Gaynesford Road have not been accounted for in terms of incursions on their RPZ's and could be damaged.	All trees (bigger than 75cm diameter at chest height) on or off site which may be impacted by the development were surveyed. Trees G8 and T35 / T34 sit within the gardens of neighbouring properties at Gaynesford Road.
Accessibility and Individual Disabilities	
How are tenants individual disabilities accounted for when giving planning permission?	Designated homes are designed to be fully accessible. When nearing completion the OT will advise of individuals disabilities so that the home can be fitted out accordingly.
Euturo Monogomont	Consultation has been held with the council occupational health team and also the lettings team. The OT will be aware of the wheelchair units being built, and completion dates by the project manager in the construction stage. Once they are due to complete the OT will assess what specific adaptions are required for the resident that will be moving into the property, and they are fitted before they move in.
Future Management	The repairs team have been consulted on the project and
Lewisham Homes are unable to maintain the existing homes to a good standard, as you may have seen in recent news coverage. How have the proposals considered ongoing repairs and maintenance, and what discussions have been had with the repairs team and their contractors to	The repairs team have been consulted on the project and the Employers requirements documents. Provisional operational maintenance strategies have been discussed with the relevant teams.
ensure they will manage the building effectively.	

Damp and noise insulation issues for existing residents should be dealt with before new blocks	There are no outstanding repairs for damp on the estate that have been reported. If not reported yet, then please
are built. Additionally, they will have balconies	let us know what this refers to.
when existing residents in closest existing blocks to proposed blocks C&D don't.	The Lewisham Good practice guide in terms of the control of Pollution and Noise from Demolition and Construction
	sites is a requirement of the contract.
Lewisham homes has failed in its obligation to existing tenants, with leaking roof and repairs and should not take on more residents until their processes are improved.	We have checked and been advised that no outstanding roof/leak repair matters. However, if something to report Chantelle will direct them to Dominique to take down details, and we will need to ask them if they have reported to repairs and when and if by telephone or email etc and then email the Council afterwards.
The new residential blocks would lead to overcrowding, noise and disruption on the estate and Gaynesford Road.	It's a large estate we are proposing to develop on, with more affordable housing that is desperately needed and 2 of the sites mainly brownfield sites. There is still considerable amount of green space. A new crossing will be put in to make it safer for residents to mix and utilise the green space on each side of the estate and there are a lot of play and estate improvements that are proposed.
Community Engagement	
Little feedback has been provided since an engagement event in 2021 and the expectation was that the final plans would be presented before submission.	Consultation has been held with the community since early 2020. The main consultation event in the summer of 2021 presented near final estate designs for further input to the community and therefore there were specific stakeholder meetings that took place with the community. In addition to that consultation took place regarding 21-32 Valentine Court refuse proposals in April 2022. The outcomes of these events have fed into the proposed final design that was presented back to the community with an update on any changes that have been made in May and a newsletter was provided to all in the community.