

## Local Meeting Minutes

26 March 2024 – St Michael's and All Angel's Church

DC/23/133854 – Land at former Bell Green Gasworks

Attendees:

Chair: Councillor Jaq Paschoud

Other Councillors: Cllr Chris Best ; Cllr Susan Wise ; Cllr Rachel Onikosi ; Cllr Cllr John Paschoud (observing); Cllr Jack Lavery (observing); Cllr Liam Curran (observing)

LB Lewisham : David Robinson and Dean Gibson (both Major and Strategic Projects – Development Management).

Applicant (Barrett): 7 client team.

Residents: 18 Residents noted on attendance list.

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### Local Meeting 26 March 2024 – St Michael's and All Angel's Church

1. Chair invited LBL Officers and Application team participants to introduce themselves and set out agenda for meeting.
2. Barrett did a 15 minute presentation of proposed development.
3. The Chair then took questions based on the following themes as set out in the order of the agenda. The written questions for each theme were taken first and then questions from the floor.

- i) Design
- ii) Housing and Quality of Accommodation for Future Occupiers
- iii) Neighbour Amenity
- iv) Transport/Highway Issues
- v) Technical Issues

#### **i) Design**

**Question 1.** What is the justification for the heights of the building when it appears to be based on a vision that was not made a planning document by Lewisham and which in turn was based on an assumption that the Bakerloo Line would be extended to a new station close to Bell Green. [Lower Sydenham & Bell Green Vision Study]

#### **Barratt Response:**

*The height is supported by the draft Local Plan (Regulation 19) and Lewisham's tall building study. The intention is to make sure that taller buildings stand alone and independently. The tallest building is within the defined tall building zone on the*

*east/south-eastern extent of the site which indicates that a building of up to 16 storeys height would be acceptable.*

Councillor / Resident Comments:

*The development should not be any higher than the height of the previous gasholders (i.e. 9 storeys) and this feedback was given to the Applicant in the public consultation meetings. Our views have been ignored.*

*We would prefer lower buildings on the site, like they have done in the new development around Lower Sydenham railway station.*

**Question 2.** Why have you not looked at the dynamic view of the Listed Livesey Memorial Hall (LMH), to check the impact this may have?

Barratt Response:

*A Heritage, Townscape and Visual Impact Assessment (HTVIA) of the proposed development was undertaken as submitted (within the Environmental Statement) which shows representative dynamic views and this has informed the design development.*

*The tallest building (Block D) at 14 storeys has been positioned on the site at the point furthest away from the LMH to minimise impact on it. It has also been reduced in height from the previously withdrawn application (it was previously 15 storeys) after design discussions with Officers. The result is that the top of Block D would not project above the ridge of the LMH in views from Perry Hill in dynamic view.*

**Question 3.** Why has the quality of the architecture been diminished in the new application, with less detail, more mundane materials and less interest.

Barratt Response:

*We were asked by Officers to simplify the architecture and bring forward a more coherent design language. The requirement for simplification was stressed by Lewisham's Officers.*

Resident Comments:

*It looks very bland and homogenous and is not reflective of Bell Green / Lower Sydenham.*

**Question 4.** You have refused to return to the Design Review Panel for guidance, who last saw your designs in November 2022. Given your site adjoins the Livesey's curtilage, its design quality should be thoroughly reviewed. Will you now return to the Design Review Panel?

Barratt Response:

*We engaged twice with the DRP prior to the submission of the withdrawn application and the feedback from the DRP has been responded to in the design and layout coming forward. For example, the stand-alone position of the tallest block (Block D) is a response to DRP feedback.*

*Following the withdrawal of the previous application the Applicant also worked with Lewisham's planners and design Officers in series of discussions/workshops to refine design issues.*

Resident Comments:

*The DRP was explicit that the scheme should be taken back to them for further review. You have ignored that advice.*

**Question 5.** The Design Review Panel suggested that you incorporate sections of the destroyed gasholders into the structure. You have not done this, and have refused to give us a catalogue of the retained sections, and their dimensions. Without this, we cannot check whether your proposed site for the 'artwork' would be large enough for the task. I have been asking for this for a whole year, so, please can you supply the catalogue now?

Barratt Response:

*We have referenced the gas holders in the landscape design. We have also brought along an inventory (to share/handout) of the gasholder fragments. We are willing to work with residents through a resident steering group to further ensure that the history of the site is referenced in the public art strategy.*

Resident comments:

*The re-use of the gasholder fragments within the proposed buildings fabric was promised at local consultations. The Applicant has not kept to that promise.*

**Question 6.** Nowhere in your plans do you acknowledge the vivid blue of the gasholder sections. The colour is non-negotiable, as it is integral to the memory of these much-mourned icons. The only picture of a section is entirely rust-coloured, probably from an underground section, which is not representative of the actual visual effect. How have you calculated the effect of this vivid blue against your proposed materials, including the glazed brick doorways?

Barratt Response:

*We are confident that the 'blue' colour of the gasholders can be incorporated into the public art strategy/landscaping.*

Resident comments:

*The re-use of the gasholder fragments and their blue colour is an important part of the history of the site. By not having any strategy in place to re-use the fragments the Applicant has not kept to the promise to re-use the gasholder fragments.*

**Question 7 (from Floor).** Questioned overall scale and height of development and considered it an overdevelopment of the site. Why is the development not based on a street-based layout with lower-rise buildings as set out in local masterplan ?

Barratt Response:

*The proposed north-south and east-west routes will have a street-based character and the lower storey buildings of the proposal are set behind the LMH. The gaps between the buildings would also assist to diminish the overall massing of the buildings. The routes are greened and tree-lined and are prioritised for pedestrians to further add a street quality to the layout.*

*Developing the site for traditional houses would not be viable for any developer to do as it would not allow a quantum of development to be provided for the site to be developed.*

Resident Comments:

*We would prefer streets with houses like currently exist on surrounding streets. The blocks of flats should be no more than 4 storeys height.*

*There will be too many people on the site and this will lead to problems – crime, anti-social behaviour, litter, noise.*

*The scale of the development will overwhelm the LMH.*

**Question 8 (from Floor).** The development would be very visible from Perry Hill. Are there diagrams that illustrate the views of the proposed development from Perry Hill as they will actually be and the impact on views.

Barratt Response:

*There are about 15 different views shown in the HTVIA and these include views from Perry Hill/Perry Rise. We acknowledge that the proposed development would be seen in the backdrop of the LMH when viewed from Perry Hill/Perry Rise, however, as advised previously the tallest building would be sited the furthest distance from the LMH.*

Resident Comments:

*It is impossible that the development will not be seen from Perry Hill when travelling down it. The height of the 14 storey building is totally out of character with the area and will blight area.*

ii) **Housing**

**Question 1.** Why is the amount of affordable/social housing so low – only 26% of the entire scheme?

Barratt Response:

*The affordable housing of 26% offer is a significant increase from the previously withdrawn application which was 4% (the withdrawn application would have been dependent on grant funding from the GLA to increase it to 35%)..*

*The affordable housing amount has been independently assessed through a viability process. The independent review was undertaken by BNP Paribas who agreed that the 26% offer, based on habitable room numbers, was the maximum provision of affordable housing that could be provided in the scheme. The 26% is an offer that is not dependent on grant funding.*

*One of the key factors that is impacting viability is the current high costs associated with construction (raw materials, transportation, labour).*

*If grant funding from the GLA had been available then more affordable housing would have been offered.*

*The affordable housing would provide a 70/30 split of rented accommodation (London Rented) and shared ownership accommodation. This would be a policy compliant split.*

Resident / Councillor Comments:

*The affordable housing offer is still poor and not compliant with the 35% required in the London Plan.*

**Question 2.** Will the affordable/social housing be provided if grant money isn't available?

Barratt Response:

*Yes. The 26% affordable housing offer is not dependent on grant funding.*

**Question 3.** Why does a quarter of the scheme – 26% - consist of single aspect flats? Surely this is contrary to the London Plan?

Barratt Response:

*The design process is iterative and is largely informed by optimising the capacity of a site. The London Plan does not prevent single aspect units – it just requires that where they are provided they have adequate mitigations on issues like light. In this instance none of the single aspect units are north facing and 74% of the units are dual aspect.*

**Question 4.** The ground floor of the estate, with the retail square, could easily become blighted with rubbish and detritus. The CGIs show lots of people, but only during daylight hours and in summer. Other than going to a flat or potential shop, there is no destination through the estate. Will a management plan be put in place to ensure that the estate is looked after?

Barratt Response:

*The CGI's are illustrative only. We can provide other views if required.  
The site would have maintenance contracts in place to manage service issues.*

**Question 5 (from Floor):** There will be 59 affordable housing units. How many of these will be filled from Lewisham's waiting list and who will the Housing Association be ?

Barratt and Officer's Response

*There is no housing association on board as yet, but Barratt are trying to secure one and discussions are also ongoing with Lewisham's housing team. Usually Lewisham would have priority in affordable housing provision. Often, where a local council does acquire the affordable housing units the shared ownership tenure is switched to affordable rent. The majority of the 3 bedroom units on site would be for affordable social rent and this is likely to benefit local families.*

Resident/Councillor Comments:

*Not acceptable that you cannot establish whether the affordable flats will help to address Lewisham residents affordable housing need.*

**Question 6 (from Floor):** Why are south facing windows proposed, won't this cause overheating ?

Barratt Response:

*The flats with south-facing windows are all dual-aspect flats. Also, all the flats have mechanical ventilation to assist with air-flow distribution.*

**Question 7 (from Floor):** A total of 262 flats will result in about 1000 people on site. Who will provide infrastructure ?

Barratt and Officer Response:

*The development will be subject to the Community Infrastructure Levy (CIL), which is estimated to be circa £1.7million (subject to any claim for exemption such as affordable housing). The monies could help to fund contributions towards infrastructure such as local schools, health services, transport, and amenity spaces. S106 contributions can also assist some general infrastructure provision.*

Resident and Councillor Comments:

*There aren't enough doctors to serve the current area let alone more residents. There aren't enough schools or parks to serve the children of the development. A number of local schools have places available. Some of the CIL funds should be used to improve Sydenham Green.*

**iii) Neighbour Amenity**

**Question 1 (from Floor).** Nearest park is 800m from site and children will have to cross busy roads. Has that been considered?

Barratt Response:

*It is likely that younger children visiting local parks would be accompanied by parent. However, amenity space, with play activity/equipment for children will provided on site in the ground level amenity areas. This includes provision of amenity and play space for children of 12+ years.*

**Question 2 (from Floor).** You are setting precedent for a 15 storey building in area. How is that justified as it will impact on neighbour amenity in terms of light?

Barratt response

*A daylight and sunlight report has been submitted with the application which shows no adverse impacts on nearby residential buildings. The development is well very separated by distance to nearby neighbouring property.*

**Question 3 (from Floor).** The building heights/amount of development will impact on people using shops in Bell Green retail park. Concerns that tall building precedent/masterplan for area will lead to loss of Sainsburys - thousands use Sainsbury's every day. Has this been considered ?

Barratt Response

*It is likely that Sainsburys would remain on site and flats would be built above it if the site is re-developed, however, we are not in control of the Sainsbury's site.*

**Question 4 (from Floor).** This is a suburban area and the proposed development will make the area look like the area next to Lewisham railway station (i.e. with tall buildings). How can that be justified?

Barratt and Officer Response:

*The draft local plan makes provision for tall buildings on part of the site and that in turn has been informed by the Tall Buildings Review (January 2023) which defines*

*the area in the east of the site as suitable for buildings up to 16 storeys in height. The proposal is for 14 storeys so is actually below the height established in the Tall Buildings Review. There is then an expectation that the site will come forward for development with some element of tall building on it.*

**Question 5 (from Floor).** Does the current local plan support tall buildings on the site ?

Barratt and Officer Response:

*The acceptability of tall buildings on the site is not only dependent on the draft local plan as the current London Plan policy allows for tall buildings to be provided in new development subject to appropriate assessment and on a plan-led basis.*

Resident and Councillor Comments:

*The height of the buildings has not reflected the feedback given by residents and local councillors that high-rise blocks were not supported and that no building should be higher than the height of the former gasholders (i.e. 9 storeys).*

*It will set a precedent for tall buildings in Bell Green and Sydenham.*

#### **iv) Transport**

**Question 1.** How does the vehicular and pedestrian access within and surrounding the site operate? The hammerhead turnaround appears in direct conflict with the<sup>7</sup> pedestrian accessibility, which is promoted as, and identified as 'Green linear walk' with 155m<sup>2</sup> of 'play on the way' for 5-11 year olds. With the volume of trips predicted at the site (three to four vehicles per hour using the access road, i.e. one vehicle every 15 to 20 minute when including the Livesey), it is difficult to understand how this would be practical, and how this interacts logistically (along with any neighbouring Livesey Hall development access).

Barratt Response:

*There will only be one vehicle route through the site, coming from the existing vehicle access point to the west of the site. The parking and access layout is designed for pedestrian priority and with visibility to the fore. The layout is such that it will make drivers slow down and make drivers make cautious. There would be different surface treatments/markings to delineate motor-vehicle parking areas. There is also a second delivery point between Block C and D in the event that two-delivery vehicles arrive at site at the same time.*

*The vehicle access, disabled parking spaces, and delivery/servicing parking arrangement was also discussed and agreed with Lewisham's highway Officers leading up to the submission of the current planning application.*

**Question 2.** How has pedestrian accessibility, crossing over to Aldi and Sainsburys been considered and assessed? There doesn't appear to be any demonstration of improvement, along with links to the river. Whilst the Transport Assessment may state vehicle trips generated by the development are not significant, the specific congestion



at the roundabout at Alan Pegg Place does not appear to have been considered. This is commonly congested and the demonstration of these trips in this locality has not been presented within the Transport Assessment. Similarly, the trips accessing the development from the Spine Road have not been specifically identified. This location is challenging for pedestrians crossing the road, on account of visibility and frequency of vehicles experienced. With increased vehicles at this location; existing users, and new residents will have an intimidating and uncomfortable route out of the site into the retail park, and towards the Waterlink Way.

Barratt Response:

*The scheme is effectively a car-free development and so the number of additional vehicle trips associated with it and coming off the roundabout at Alan Pegg Place will also be very low.*

*The Applicant also undertook a Healthy Streets Assessment which considered local routes, including to Waterlink Way. Any identified deficiencies were reported in the submitted Transport Statement and funding will also be allocated from the s106 agreement towards making these improvements.*

**Question 3 (from Floor):** How will you improve Waterlink Way and the adjacent river? How will litter be managed that goes into river?

Barrett Response:

*All refuse storage areas on site will be enclosed and there will be a waste management strategy to ensure that the waste is properly managed. Money will also be provided to improve cycle routes.*

**Question 4 (from Floor):** Site has a very low Ptal and the residents will definitely have cars. The occupiers of flats above Sports Direct do not have cars and park on double-yellow lines. Where will cars for the development park ?

Barratt and Officer Response:

*The development is car-free (except for disabled spaces). This is in line with planning policy to move away from car use.*

*Ptal can be false as it is based on an algo-rhythm. For example, it does not take into account proximity of site to Lower Sydenham railway station.*

*Local roads directly outside the site and retail car parks near to the site are subject to parking controls. Experience shows that residents do not walk more than 200m to park a car so other local roads unlikely to be impacted.*

*There are some existing car-club spaces in locality that could be used.*

*The application would also be subject to a S106 which would prevent future residents (except disabled persons) for applying for a permit in the event that a Controlled Parking Zone is introduced to local roads.*

**Question 5 (from Floor):** Where are drop-off points, car club, and loading bays going to be?

Barratt Response:

*Loading bay will be near to the western side of site – near Block E. There will be another one located between Block C and D. Only expecting 3 to 4 trips per hour. Car club provision will be discussed with Officers although there are two existing car club spaces in the vicinity of the site.*

### **v) Technical Issues**

Due to time-constraints the written technical questions on the meeting agenda were not discussed in any great detail and so Barratt offered the interested parties who put those questions the opportunity to discuss the questions with them directly in a follow-up Teams meeting. This meeting subsequently took place on 18<sup>th</sup> April.

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The following questions were answered on the evening:

**Question 1 (from Floor) :** On overheating you are not in compliance with energy hierarchy and you could energy by 50% by using a ground source heat pump system. Overheating strategy has not been resolved and nor has noise. It puts viability of Livesey Hall at risk ?

Barratt Response:

*The proposed Air Source Heat Pumps (ASHP) are in line with London Plan and meet our carbon off-set requirements. The energy is 100 ASHPs.*

**Question 1a (from Floor):** report says modelling has not been finished?

Barratt Response:

*We can provide final report and it can be made public.*

**Question 1b (from Floor):** On noise we do not want complaints about the Livesey Hall ?

Barratt Response:

*The assessment undertook a late night-time survey to consider worse-case scenario. Also, the flats will have acoustic-glazing and future residents will be made aware that they cannot make complaints.*

**Question 2 (from Floor) :** Livesey is a special place and you have not left enough space behind it to alleviate noise nuisance. Noise from Livesey on future occupiers

of development not taken into account and they will make noise complaints. Its been two years of raising same issue and nothing has been done. Why not ?

Barratt Response:

If people live in London then noise is to be expected. We have sought to mitigate as far as possible and have undertaken two noise assessments in line with agent of change principles.

**Question 3 (from Floor):** You said you have done an overheating assessment – have you assessed wind tunnels ?

Barratt Response:

*Yes, a wind and micro-climate report was submitted with the application.*

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Councillor Paschoud thanked all for attending, the applicant for the presentation, and residents for their questions, and the applicant for their responses.

**Meeting Ended**

**Disclaimer: This is not intended to be a verbatim record of the local meeting but rather a summary of the questions and responses provided.**

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### **Supplementary Energy Questions – MS Teams Meeting – 18<sup>th</sup> April 2024**

This meeting was held separate from the Initial Local Meeting and was conducted between the Applicant team (Barratt) and two residents.

Barratt

They advised the intention of the meeting was to be more of a discussion rather than a question answer session.

Resident

Not convinced that met GLA requirements for energy reduction are met ; not convinced by noise strategy impact on LMH – links into overheating/ventilation ; Ground energy pile more efficient – fuelling strategy ;Why is there not space for energy piles.

Barratt

For ground source heat pumps there are site constraints with foundations and gas works – would have needed more space internally – which is why ASHPs are proposed. Also, below ground are remnants of former gasholders – did not discount ground source heat pumps for outset - but site constraints dictated the ASHP.

Resident

Only need small holes for providing energy piles. I estimated that 50 could be provided on site.

Barratt

Had to consider other features like services - rainwater systems, water services / water attenuation, bentonite wall, gas pipes Would make it very complex for energy piles.

Resident

I would do survey and work out how many piles are needed, but that's not been done.

Barratt

We may be able to a survey, but ASHP are compliant with energy requirements.

Resident

Don't think you are compliant as ground source heat pumps provide less carbon than ASHP's. So it has not complied.

Barratt

Viability – capital costs need to be considered.

Lots of site constraints below ground – we have optimised energy / carbon reduction – allows for wider planning picture – allows for affordable housing.

Resident

Not demonstrated that energy is optimised.

Barratt

It is the most viable energy strategy for site. Going above and beyond makes scheme unviable and impacts on affordable housing.

Additional cost like 0.5 million pounds would impact viability significantly like affordable housing.

Resident

GLA maximising affordable hsg - not eligible for fast-track.

Barratt

GLA actually reported factually on affordable housing.

Residents

Can't work out how viability is important.

Extra 0.5 million to provide ground source heat pumps would allow significantly large carbon reduction.

Resident

Next point is overheating – will still overheat but not uncomfortable at 26 degrees – that is questionable ?

Residents will open windows and let in noise from LMH. Need another strategy for heating like ground coupling system.

Barratt

A heat sink would improve things but scheme designed to Control document 'O' – GLA compliant. Also, handover residents pack would provide guidance on adaption – how

to use ventilation properly and how to use fans to accord with GLA policy. The higher floor rates of MVHR dictate heat.

Resident

What about other solutions – ground coupling / partial ground source heat pumps for example, or adiabatic coolers – look at them as whole ?

Barratt

Higher flow rates does mitigate MHVR overheating.

Resident

26 degrees could be exceeded – so residents will open windows – overheating assessment based on minimum requirements.

Barratt

Strategy is policy compliant with GLA.

Agent of change principle taken very seriously and we revisited noise surveys – specifications tailored to facing elevations to LMH and this was agreed at Besson Street scheme. Those purchasing flats would be aware of noise issues and take into account and will include contractual obligations/restrictions to comply about noise.

Resident

Won't work in practice. Should design better to not allow the situation to occur in first place.

Barratt

We can't just take underfloor heating in isolation.

Resident

No need for just underfloor heating – could be other solutions.

Barratt

Our consultant will look at ground source heat pumps and their impact on wider implications on scheme.

There are lots of many other constraints. For example, additional space - like additional pumps and kits which would need to be accommodated.

Resident

Water source heat pumps take up less space.

Barratt

Ashps will be on roof, but it's the ancillary equipment which will take up space.

Resident

We expect to see pre-lim assessment on thermal load and then assess to calculate x number of energy piles and plot on drawings.

Barratt

Will look at / take-away and provide a response.

Resident

I understand costs uncertainty. Comparisons are based on historic equipment like boilers. Would be a benefit to Barrett and set precedent for other development.

Barratt

Windows will be openable and not hermetically sealed.

Resident

You are dismissive of solar thermal.

Barratt

GLA policy advocates using roof space for energy reduction – solar thermal would not make much difference. Policy weighted towards PV.

Residents

Discussion in lease that they can't complain. If flats are leased this is a risk of aggravation. Any heat recovery under car parking space (paving) ?

You can get 15% energy from underheat solar thermal panel paving – well worth considering.

Barratt

Not looked at that as an alternative. Roof level optimised with pv panels.

We are clearer on points being raised and will reflect on them and discuss with LBL.

Residents

Pleased you see it that way and that's positive and will feed into history of gasworks.

Lots of strong feeling about energy and would have like to see gasholders filled in and used as a heat store.

End of meeting

**Disclaimer: This is not intended to be a verbatim record of the energy meeting but rather a summary of the questions and responses provided.**

**Supplementary Transport submitted 27 March and 10 May - Questions/Responses**

**Question 1.**

**Please expand upon (and provide evidence for) the comment made at the meeting by the representative from Barratt London who said they don't believe the site is classified as having poor public transport provision/access? The site has been shown to have relatively poor public transport access, yet it appears to have been represented as if it is "highly accessible?"**

Response

*Consideration of 'Public Transport Accessibility Levels (PTALs)' are given in the paragraphs 5.34 and 5.35 of the submitted Transport Assessment which advises that PTALs are a theoretical measure of the accessibility of a given point to the public transport network within Greater London, considering walking access time and service availability and frequency. PTALs are determined by the proximity of a site to public transport services, such as bus stops, rail, and Underground stations. The method is a way of measuring the density of the public transport network at a particular point. PTAL is categorised into eight levels of accessibility, from 1a (worst) to 6b (best). Bell Green has a PTAL rating of 2. The suggestion that the site has relatively poor public transport access comes from the PTAL score for the site of 2. However, as above, this is an algorithmic figure based on walking distances to bus stops and railway stations, and the frequency of services from those stops. The cut off in the calculation for what is considered an 'acceptable' walking distance to a railway station is 12 minutes; anything above a 12-minute walk is excluded. Therefore, the PTAL score does not account the rail services available at Lower Sydenham station, because the station is a 12-13 minute walk away, which is just above the threshold of what is considered by PTAL to be an acceptable walking distance. Nevertheless, it is considered that Lower Sydenham presents a viable public transport option from the site, in addition to the 25 buses per hour departing from the stops on Alan Pegg Place/Spine Road (19 per hour are served from here, a 1 minute walk from the site) and Perry Hill (within a 3 minute walk from the site). Figure 5.3 of the Transport Assessment demonstrates that large parts of London, including, south, central, east and north London are all reachable within a 60 minute journey time using public transport alone. Therefore, public transport presents a viable modal choice for residents of the site and the site is considered to be highly accessible in that respect and, as above, it is not considered that Ptal per se fairly represents the accessibility of the site.*

### **Questions 2 and 3**

**What evidence is there that there is sufficient capacity on the public transport network to cater to the additional demand arising from the development?**

**Are any improvements going to be proposed to the existing public transport network (especially bus routes and interconnectivity) given the development is intended to be 'car-free' so future residents will have to mainly rely on public transport.**

#### Response

*The figures in the TA indicate that there will be around 20-40 movements per hour (arrivals and departures to/from the site combined) using buses in the peak hours, and 40-70 movements by train (arrivals and departures to/from the site combined). This equates to one or two additional passengers per bus on average and is therefore considered to be well within the existing capacity – similarly, for trains this equates to around five to ten additional passengers per train and would therefore again be well within the existing capacity and also within the natural daily fluctuations in passenger numbers.*

*Also, a Sustainable Transport Audit was undertaken and included with the submitted Transport Assessment (Section 5). It includes assessment of sustainable modes of*

*transport such as walking, cycling, bus service, and rail services. It also considers the proximity of the site to local facilities. The Applicant is in discussion with Transport for London regarding potential funding for local bus enhancements. Also, the Application is subject to the Community Infrastructure Levy which can, at the discretion of the London Borough of Lewisham, direct funding to local transport infrastructure.. A Framework Travel Plan was also submitted and is intended to provide a comprehensive means of managing the transportation impacts of the development by providing a series of suitable measures and objectives designed to encourage site users to use more environmentally friendly modes of transport when making journeys to and from the Site. It provides a mix of incentives to travel by public transport, on foot and by bicycle.*

*In light of these factors and the findings of the Transport Assessment the Applicant is confident that sufficient public transport capacity will exist for the proposed development.*

*Also, as above, discussions are ongoing with Transport for London about any specific issues regarding existing public transport provision that may need to be addressed, but as set out above it is considered that there is already significant capacity on the network for the level of trips expected.*

#### **Questions 4 and 5**

**For the development to be a totally 'car-free development' the representative at the meeting asserted that no future residents would own a vehicle. How will this be enforced? Does the developer propose to write into the leases and tenancies clauses and restrictions that prohibit residents of the development from using or owning a vehicle?**

**Has there been a parking survey and analysis for the areas surrounding the proposed development?**

#### **Response**

*The Applicant cannot prevent a future resident from 'owning' a car, however, a Car Park Management Plan was submitted with the application and there are practical measures that the Applicant will put into place to dissuade future residents from car ownership. No resident will be permitted to park a vehicle on-site (except for blue badge holders) and there is no legal on-street parking in close proximity to the site – it is therefore considered that the impracticality of car ownership would prevent residents owning a car, and it would be made clear at the time of purchase that no parking will be provided.*

*In this case, the development provides for 8 off-street disabled car parking spaces (for Blue Badge holders) but no other car park spaces for residents are proposed and so non Blue Badge holders will not be able to park on the site. Site residents who are permitted to use the parking spaces will be provided with a parking permit. Ad hoc resident car parking on the site would be prohibited and enforced through the servicing and management of the site. Also, there are existing local parking controls (i.e. yellow lines) which would prevent future residents from parking in Alan Pegg Place and Spine Road, while the car parks in the Bell Green retail park are subject to maximum time-*



*limits for parking. In the event that a Controlled Parking Zone (CPZ) is introduced to nearby local roads then the Applicant has agreed with the Council that no future residents (except for disabled residents) would be able to apply for residents parking permits in the CPZ. As advised above a Travel Plan would also be put into place to promote sustainable travel choice and this includes use of a car club. These measures are designed to dissuade future resident occupiers from car ownership.*

*A standard methodology parking survey (known as Lambeth Methodology) was undertaken in October/November 2023 which was an overnight (1am) survey of all roads within 200m walking distance of the site, and found that there were 34 and 38 legal parking spaces respectively available on the two nights surveyed within that distance. The submitted Car Park Management Plan provides an analysis of local parking conditions. It states that on-street parking availability is limited within the vicinity of the site. East of Perry Hill, the access roads to the retail park and supermarket are all subject to double yellow line parking restrictions and therefore no on-street parking is available in this location. West of Perry Hill, there is some parking availability on Perry Rise and beyond to the west, with some unrestricted parking spaces available in between bus stops and junctions. However, there are very few spaces within 200m the site, and they are separated from the site by the Perry Hill/Alan Pegg Place/Perry Rise crossroad junction. Therefore, they are not considered to be an attractive proposition for parking for future residents of the development. Similarly, further north on Perry Hill there are a number of on-street spaces available. However, there are only a handful of spaces within 200m of the site, and the spaces beyond (such as on Selworthy Place) are not considered to be a viable parking space for future residents, as walking distances would be in excess of 400m. No off-street parking is available to residents in the vicinity of the site; restrictions are in place at the retail park and supermarket which prevent long-stay parking. No other off-street parking is available nearby.*

#### **Question 6**

**Has the volume/frequency of traffic and the parking needs of visitors to the residents of the proposed development (i.e. everyone who would not be bound to being "car-free") been considered and projected?**

#### Response

*The submitted Transport Assessment includes a Trip Rate Information Computer System TRICS analysis of trip rates for the proposed developments specifically to quantify the trip generation of the proposed development. The trip generation assessment has been agreed with Lewisham's Highway Officer.*

#### **Question 7**

**Noting that the development is not within a Controlled Parking Zone (CPZ), if it were to be designated a car-free development it would require a CPZ to be introduced. Where will this CPZ be? What hours will it operate? How much will a permit cost existing residents? Will the future residents of the proposed development also be allowed parking permits for the new CPZ or will they be excluded because they are supposed to be 'car-free'?**

#### Response

*There are no plans for a CPZ in the vicinity of the site. However, the Applicant is in discussion with Lewisham about making a potential financial contribution towards a CPZ implementation study if this emanates in the future.. Details of how CPZ are formed, hours of operation, and costs for permits is on the Council's website <https://lewisham.gov.uk/myservices/parking/permits>*

*As advised above, in the event that a Controlled Parking Zone (CPZ) is introduced to nearby local roads then the Applicant has agreed with the Council that no future residents (except for disabled residents) would be able to apply for residents parking permits in the CPZ.*

### **Question 8**

**Regarding the proposed 780.8sqm of Use Class E retail and workspace units in the development, where will the business owners, staff and customers park, and what will be the additional impact on public transport?**

#### Response

*The commercial floorspace trip generation has been factored into the overall figures, and is included in the agreed figures in the Transport Assessment. Also, it is anticipated that owners, staff and customers would use public transport in line with the "car-free" nature of the development. No specific off-street parking spaces for the commercial use, aside from delivery/servicing bays, are proposed on site. Notwithstanding that the Bell Green retail park car parks can provide opportunity for some time-limited parking for owners, staff and customers. A Delivery and Servicing plan has also been submitted with the Application.*

### **Question 9**

**Regarding the point about potential noise from the Livesey Hall leading to complaints from the future residents of the proposed development, the answer from the Barratt representative was along the lines of saying people have to live with noise. The problem with that approach is it doesn't improve design and build quality and goes against the "agent of change" principle. How will the developers actually mitigate the impact of social/cultural noise (e.g. of gatherings of people outside the Livesey Hall and coming & going to/from events) on the future residents of the new development (without just telling them "it's London, it's noisy, put up with it").**

#### Response

*The submitted Noise and Vibration Assessment includes consideration of noise impacts from the Livesey Memorial Hall (LMH) and sets out a glazing strategy for proposed development to mitigate noise impacts on the nearest proposed residential block from the LMH.*

#### Local Meeting

*No further local meeting is proposed. Minutes of the local meeting will be appended to a Committee report if the application is reported to the Strategic Planning Committee (for information the minutes are not a transcript or verbatim record).*

## **Further Questions/Responses 10 May.**

### **Re Question 1:**

Lower Sydenham station itself has PTAL score 2. Please see <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat?Input=lower+sydenham+station&type=Ptal&zoomLevel=17>

Your answer suggested that if the site of the proposed development was under 12 minutes walk from Lower Sydenham railway station rather than over 12 minutes walk, it would have improved the site's level of public transport accessibility.

Even if the development was located right next door to the railway station, it would still have had a PTAL score of 2, so a 1-minute difference in walking time to the station wouldn't improve the level of accessibility of public transport as suggested.

### **Response**

*There is nothing further to add to the response of 3 May except to reiterate the public transport presents a viable modal choice for residents of the site and the site is considered to be highly accessible in that respect and, as above, it is not considered that Ptal per se fairly represents the accessibility of the site.*

### **Re Questions 2 and 3**

You mentioned the Community Infrastructure Levy, allowing the Borough of Lewisham to direct funding to local infrastructure. What are the proposals for improving the local infrastructure? Prior (or in-conjunction) infrastructure improvements could help make the location and scale of the proposed development more suitable, but there's currently no indication as to what improvements are planned.

### **Response**

*The proposal would make potential provision for a flexible Class E uses at ground floor in the Blocks A, B, C, and D. These units could provide infrastructure such as indoor sport and recreation, health centres, and day nurseries. The units could play important role in developing strong and inclusive communities and provide an opportunity to bring different groups of people together, contributing to social integration and the desirability of a place. Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes health provision, education, community, play, youth, early years. Its provision would be particularly well aligned to the proposed development which includes a high amount of family accommodation, and it could also be a resource facility for the wider local community. Therefore, the function of flexible Class E units could make a significant contribution to the social cohesion of the site and its provision would be supported by policy.*

*The proposed development would also make a financial contribution to local infrastructure through the Community Infrastructure Levy (CIL) which is a levy intended to mitigate the impacts of the proposed development on local infrastructure. The way in which monies collected will be directed towards social infrastructure, such*

as education, health and adult social care, and community use is set out in Lewisham's Infrastructure Delivery Plan.

The most localised current infrastructure to the Application site includes educational, health facilities, and recreation as set out below.

#### Local Infrastructure Near to the Application Site

Infrastructure Type	Name	Distance from Site	Comments
Nursery	Little Elms Nursery Sydenham	75m west.	
Primary school	Adamsrill Primary School	200m west.	
Primary school	Haseltine Primary School	200m south.	
Secondary School	Forest Hill Secondary School	700m west.	Surplus capacity of 347 students.
GP Practice / Health Centre	Sydenham Green Health Centre.	200m south.	Accepting new NHS patients.
Park	Home Park	200m south.	Has a playground.
Park	Bellingham Play Park	400m north-east.	
Park	Mavoy Park	780m east.	Has a playground, bowling green, tennis courts, community garden.

In addition, In 2019 the Council approved a strategy, which was launched in the same year, for a Neighbourhood CIL (NCIL) process, which established two separate funding streams: a borough wide pot and ward pots. The Council has agreed to use 25% of CIL receipts for NCIL in order to for more meaningful local involvement and provide the community with sufficient resources to address the local impacts of development in a more comprehensive way.

The Council's publishes details of how CIL monies collected are allocated and spent in an Infrastructure Funding Statement. The most recent one for 2022-2023 in cludes details how NCIL monies collected has been spent on projects in local wards relevant to this application, such as Bellingham, Perry Vale and Sydenham as detailed in below.

Examples of NCIL spent in Bellingham, Perry Vale, and Sydenham.

Ward	Organisation Name	Project Name	Grant Awarded £	Grant Paid April 2022 - March 2023 £	Grant Balance £	Status
Bellingham	Brent knoll and Watergate Co-Operative Trust	Holiday clubs for children and young people with SEND	£14,628.00	£14,628.00	£0.00	Completed
Bellingham	Bubble Theatre Company Ltd	Speech Bubbles	£5,045.00	£5,045.00	£0.00	Completed
Bellingham	Christ Church United Reformed Church	Carols on the Green	£3,000.00	£1,500.00	£1,500.00	In Progress
Bellingham	Coco Collective Org	Ital Community Garden	£10,000.00	£10,000.00	£0.00	Completed
Bellingham	Council (Greenscene)	Home park-bins	£14,575.00	£0.00	£14,575.00	In Progress
Bellingham	Lewisham Cyclists	Catford to Forest Hill/Sydenham Walking & Cycling Route	£15,000.00	£0.00	£15,000.00	In Progress
Bellingham	Kids Kitchen Collective cic	Kids Kitchen Bellingham	£13,892.00	£6,946.00	£6,946.00	In Progress
Bellingham	Mythical Canvas	Draw your dream workshop	£9,900.00	£4,950.00	£4,950.00	In Progress

Perry Vale	Oaks and Acorns in Harmony C.I.C	Ravensbourne Park Gardens play and connect	£10,000.00	£5,000.00	£5,000.00	In Progress
Perry Vale	Council (Greenscene)	Mayow Park Children's Playground Improvements	£70,000.00	£0.00	£70,000.00	In Progress
Perry Vale	Stanstead Lodge Senior Club Ltd.	Stanstead Lodge Senior's Club - Repair and renovation of conservatory – Stanstead Lodge	£20,000.00	£20,000.00	£0.00	Completed
Perry Vale	Sydenham Gardens	Meeting Up - Sydenham Garden	£16,200.00	£8,100.00	£8,100.00	In Progress
Perry Vale	Kilmorie School	Kilmorie School - Early Years Outstanding Outdoor Spaces	£23,981.00	£23,981.00	£0.00	Completed

Sydenham	Friends of Sydenham Community Library	Adults' and children's crafts at Sydenham Library	£1,650.00	£1,650.00	£0.00	Completed
Sydenham	Ageing Well in Lewisham (Lewisham Churches Care)	Ageing Well in Lewisham/Lewisham Churches Care	£9,000.00	£4,500.00	£4,500.00	In Progress
Sydenham	SEE3 Ltd	High Street Happenings	£9,800.00	£4,900.00	£4,900.00	In Progress
Sydenham	Friends of Sydenham Community Library	Rhyme Time	£1,410.00	£1,410.00	£0.00	Completed
Sydenham	Venner Road Hall Community Association	Community Facilities Improvement	£9,700.00	£9,700.00	£0.00	Completed
Sydenham	Sydenham Arts	Street SmART: An Intergenerational Women's project, Safer Streets through Creative Awareness	£17,794.50	£11,863.00	£5,931.50	In Progress
Sydenham	Youth First Charitable Incorporated Organisation	Legendary Community Club	£15,000.00	£15,000.00	£0.00	Completed
Sydenham	Council (Greenscene)	Home Park Trim Trail	£13,729.00	£0.00	£13,729.00	In Progress

The proposed development could result in a total CIL payment of £1,732,150 to Lewisham, subject to any future exemptions (for example for affordable housing units) and this would provide a significant opportunities to contribute towards enhancing local infrastructure projects as evidenced above.

**Re. Questions 4+5(+6,7,8):**

Pages 455-456 of the Lewisham Local Plan ([https://s3-eu-west-2.amazonaws.com/commonplace-customer-assets/lewishamlocalplan/Transport%20Jan%202021%20LEWISHAM%20LOCAL%20PLAN\\_accessible.pdf](https://s3-eu-west-2.amazonaws.com/commonplace-customer-assets/lewishamlocalplan/Transport%20Jan%202021%20LEWISHAM%20LOCAL%20PLAN_accessible.pdf)) in section F sets out the conditions that need to be demonstrated for car-free development to be supported. The current proposal as it stands doesn't meet the conditions for car-free development as you have highlighted in your reply..

Response

*Part F of Policy TR4 (of the Draft Local Plan), which is referred to in the question, sets out criteria for allowing car-free development beyond highly accessible and well-connected locations in some circumstances.*

**Re. Question 9:**

What safeguards are to be put in place to ensure noise complaints can't be lodged by future residents when their windows are open? (The same would apply when their windows are closed if the glazing on its own is found to be insufficiently sound-reducing and residents complain about noise with their windows closed). Would it then be incumbent on the developer to introduce sound deflecting/reducing barriers or modify the design of the building/landscaping? And shouldn't this therefore be a requirement of the design/architecture/landscaping of the development from the outset?

Response

*The Applicant advises : That the agent of change principle is taken very seriously and that revisited noise surveys prior to the submission of the planning application ; The windows specifications are tailored to facing elevations to LMH and this was agreed at another scheme ; Those purchasing flats would be aware of noise issues and take into account and will include contractual obligations/restrictions to not complain about noise.*

**Re. Question Local Meeting:**

Please can the questions/answers be appended to the minutes as having been part of the public local meeting on 26th March, because these questions would have been asked if the meeting had not run out of time. This is also because you said that the proposed further public local meeting won't be happening after all, and if it's the case that the local meeting of 26 March was the only opportunity that residents had to ask questions about the proposals, then the emailed questions should be included too.

Response

*I will append as supplementary questions / to local meeting minutes.*