

Appendix B

**MAYFIELDS HOSTEL, 47 BURNT ASH HILL, LONDON, SE12 0AE**

**DC/17/103886**

Group Representation



**Re: Planning application ref DC/17/103886 – Mayfields, 47 Burnt Ash Hill, SE12**

Dear Sirs,

At the public consultation meeting held on 13<sup>th</sup> December 2017 you kindly invited those members of the public in attendance to submit a group representation giving our collective views and objections to the proposed development at Mayfields, 47 Burnt Ash Hill.

The first thing that we want to make clear is that we fully support the need to provide additional homes in Lewisham and understand that The Mayfield site would be ideal for this purpose.

Our major concerns about the proposed development relate to:

1. The height and character of the main building.
2. Inadequate amenities for future residents.
3. The impact on local services.
4. Design and density.

We have referred to the London Plan and the Housing Supplementary Planning Guidance published by the Mayor of London when commenting on the proposed development.

## **1.Height and Character**

### **1a Local area and streetscape**

- The proposed height and character of the development is totally out of context with the local area and streetscape.
- Policy 7.4 of the London Plan refers to local character and states:

*Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.*

- We fail to understand how a building of this magnitude and elevational treatment conforms in any way to the above requirements. The adjacent buildings have a maximum height of 4 storeys and are generally of brick elevation.
- The proposed design does not demonstrate any regard for the pattern of the existing streetscape in terms of scale, proportion or mass. Nor does it allow the existing adjacent church to retain its positive contribution to the character of the area. This proposed development will simply dominate the streetscape.

### **1b Privacy**

- The 6-storey height of the main building will have a very detrimental impact on the privacy of those properties that it overlooks both front and rear. To the rear, balconies and

habitable rooms of the main block on Burnt Ash Hill will provide a direct and intrusive view of gardens and rooms at the back of Pitfold Road properties. These currently benefit from a high level of privacy and the proposals will significantly reduce residents' enjoyment of their own homes. This will be further exacerbated by the proposed tree removal (see below). The enjoyment of natural light to existing homes will also be significantly reduced should a six-storey block be constructed.

- The Housing Supplementary Guidance states:  
***Standard 28** –design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.*  
This standard is aimed at the properties on the new development but it should also apply to the pre-existing neighbouring properties.  
The balconies of the new flats will be overlooked by the rear of the properties in Pitfold Road and also the properties on the opposite side of Burnt Ash Hill. Due to the height of the new development the fronts of the properties on the far side of Pitfold road will also be affected.

### 1c Trees

- Paragraph 2.2.5 of the Housing Supplementary Guidance states:  
*Development proposals should also enhance provision of green infrastructure in the public realm, helping to mitigate and adapt to climate change (Policy 5.10 Urban Greening), extend tree cover (Policy 7.21), improve biodiversity (Policy 7.19) and to help enhance physical activity, walking and cycling opportunities and reconcile conflicts of use (Policy 3.2 Improving health and addressing health inequalities Policy 6.9 Cycling and Policy 6.10 Walking).*
- There are many existing, mature trees on the site that must be considered as a major constraint to the development. We would have expected the Arboricultural Impact Assessment Report to have included a survey of the existing trees, and then to have recommended confining the development of the site in such a way that the trees were not affected. However, it is stated in the conclusions of the Report that, “The proposed development will require the removal of 32 trees”. This clearly demonstrates that it is **the scale of the proposed buildings that is dictating tree removal rather than assessing the constraints that the trees place on the development of the site and then designing a development to suit.**
- These trees are a real asset to the area. Of the 49 trees on the site, it is proposed to fell 32 and we wonder how the removal of this number of trees will affect local air quality given that the area is already dominated by traffic on the South Circular Road and Burnt Ash Hill.
- We are also concerned by the potential for increased noise pollution posed by tree removal in conjunction with new residential development.
- How does the proposal to fell so many trees fit into the London Mayor's plans for a greener London? Although the proposals allow for landscaping, it will be decades before any new planting might provide the privacy and environmental benefits afforded by the existing trees.

## 2 Amenities for future residents

- The proposed development comprises 47 family homes. We consider that the provision of open space, play space, car parking and social infrastructure has not been addressed satisfactorily.

### 2a Parking

- There will be just 4 disabled parking spaces on this site with no other parking provided. We understand that this is a matter of policy. However, it seems highly unlikely that the development of family accommodation will not generate car use and therefore an increased demand for, and pressure on, local parking provision.
- A car parking survey submitted with the planning application clearly shows that there will be very little parking available for the new residents. This area suffers an influx of cars on weekdays due to non-residents parking in our roads to use Lee train station to travel to work. The residents of this new development will be car owners, regardless of the dictates of policy, and these cars will have to be parked in the surrounding streets which will only exacerbate an existing problem. If this is the case, it is likely that residents of nearby streets will apply for controlled parking zones thus further reducing the number of available parking spaces.
- It was reported at the last meeting that car owners who currently live in Mayfield park their vehicles in the private parking area of the adjacent flats and climb the fence to access Mayfield. This practice is likely to continue, or get worse, should this development go ahead.

### 2b Play areas and open spaces

- This development could potentially house 140 children but no provision has been made for play areas within the site.  
Paragraph 1.3.21 of the Housing Supplementary Guidance states:  
*Where a development includes family housing, accessible play spaces designed to meet the needs of younger and older children should be provided, taking account of the projected child population in line with Policy 3.6.*
- The Housing Supplementary Guidance includes the following:  
**Standard 5 (and Policy 3.6)** – *For developments with an estimated occupancy of ten children or more, development proposals should make appropriate play provision in accordance with the Mayor’s Play and Informal Recreation SPG.*
- And paragraph 2.2.13 of the Housing Supplementary Guidance states:  
*Policy 3.6 Children and Young People’s Play and Informal Recreation Facilities, seeks to ensure that all children and young people have safe access to good quality, well designed, secure and stimulating<sup>123</sup> play and informal recreation provision. Housing development proposals are expected to make appropriate provision for play and informal recreation based on the expected child population generated by their scheme and an assessment of future needs.*

- None of the above guidance is met by these development proposals.
- The Housing Supplementary Guidance includes the following:

**Standard 4** - *Where communal open space is provided, development proposals should demonstrate that the space:*  
*is overlooked by surrounding development;*  
*is accessible to disabled people including people who require level access and wheelchair users;*  
*is designed to take advantage of direct sunlight;*  
*has suitable management arrangements in place.*

- The proposed development has very little communal open space. There is an area designated as “Community Garden Space” but this is in the northern most corner of the site, is not overlooked as adjacent house walls have no windows, is not accessible to wheelchair users and will be in the shadow of the main building. As such this space does not comply with the guidance.
- It was suggested at the public meeting that the need for play areas and open space was met by the provision of the balconies to each flat. There could be 4, or more, children living in some of these flats and the provision of a balcony cannot be deemed suitable or adequate play space.
- Paragraph 2.2.5 of the Housing Supplementary Guidance states:

*Whilst there are inherent benefits in providing larger family housing at relatively low densities, it is possible to successfully accommodate family homes within higher density schemes, where these units are carefully located and designed. For example, ground level family maisonettes, duplex apartments or terraced houses can be provided within schemes of much higher densities, with front doors at street level, private gardens and play space provided either in communal areas or public open space, with good overlooking from family units. This also provides a number of advantages in terms of natural surveillance (see standard 10).*

- And paragraph 2.2.26 of the Housing Supplementary Guidance states:

*Where family units are provided on the upper floors it is important to ensure appropriate private open space is provided with adequate outlook, orientation, and privacy. Social infrastructure including child care and primary schools should be accessible and within a safe and convenient walking distance.*

- We do not consider that the proposed development accords with this guidance.

### 3 Local services

- As stated above the provision of social infrastructure should be addressed for any proposed development. With 47 families moving into the proposed development there could be up to 94 adults and 140 children living on this site.
- We are concerned that existing services such as doctors and schools will not be able to adequately meet increased demand. We particularly note that none of the primary schools within a safe and convenient walking distance have any excess capacity. Is the expectation that children will be required to make potentially unsafe and inconvenient journeys to schools outside the local area?

## 4 Design and Density

- We believe that the proposed use of modular construction arises from financial considerations that fail to take account of the existing environment (both on site and the surrounding area), or the quality of life for future residents. We understand that this type of construction is eligible for grant funding under the London Mayor's Innovation Fund, and that it becomes more cost efficient by increasing the number of modules employed due to the repetition involved. The Council has only to look to its own recent housing developments (Longfield Crescent, Atlas Mews and Wood Vale) to find examples of high quality new homes with a more 'traditional' aesthetic and which we all agree would be far better suited to the Mayfields site.

- With regard to the design and **density of the proposed development**, we would highlight the following guidance;

- Paragraph 1.3.16 of the Housing Supplementary Guidance states:

*In broad terms, higher densities (which assume a lower number of habitable rooms per dwelling) will be more suitable for households without children and will require less open space and play provision. Higher density housing can be particularly suitable in town centre and edge of centre locations; in areas with good public transport accessibility; and as an element of mixed-use developments, where open space and car parking may be limited. **This does not preclude provision of family homes in town centres when open space, play space, car parking, social infrastructure and other relevant factors can be addressed satisfactorily.***

- Paragraph 1.3.17 of the Housing Supplementary Guidance states:

*In areas with particularly high accessibility, consideration should be given to capitalising on this to make higher density provision for **smaller households**. In addition, there should be consideration of the extent to which the provision of smaller accessible and adaptable units in suitable locations as part of higher density mixed use development can encourage downsizing and potentially help to free-up under-occupied larger properties for families in the existing housing stock.*

- Paragraph 1.3.1 of the Housing Supplementary Guidance states:

*One of the key themes of the London Plan is the recognition that while the best use should be made of development opportunities, proper account must be taken of the range of factors which have to be addressed to “optimise,” rather than simply maximise, housing potential. Of particular importance are ensuring good design and taking into account public transport capacity and local context and character. Other relevant factors include access to social infrastructure, open space and play provision. This balanced approach to optimising output is supported by the London Plan’s broad design policies in Chapter 7 and the specific housing standards proposed in Policy 3.5. Taking all these factors into account independent consultants suggest that for the purposes of the Plan, **‘optimisation’ can be defined as ‘developing land to the fullest amount consistent with all relevant planning objectives.***

With regard to this guidance, we believe that the development proposal has been prepared to maximise the housing potential without due regard to the living conditions of the incoming residents.

- The Housing Supplementary Guidance includes the following:

**Standard 29** *Developments should minimise the number of single aspect dwellings. Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided.*

Many of the properties in this development are near north facing and as such will be devoid of direct sunlight which is noted in the guidance as being *vital* to a sense of wellbeing in the home. Those properties at the rear of the development will be worst affected with those at ground and first floor being in the shadow of the main block.

The terraced houses at the rear of the development will be constantly in the shade as will the private gardens associated with them.

- The main block will cast a significant shadow on the rear gardens of the properties in Pitfold Road during the afternoon and homes on Burnt Ash Hill during the morning, affecting existing residents’ sense of wellbeing in their homes and the enjoyment of their private outdoor space.

## Conclusion

- We do not believe that this development has been designed to fit into the existing streetscape or the existing site constraints.
- We believe that it has been developed based upon the use of modular construction, for which a grant is available from the London Mayor’s Innovation Fund, and which becomes more cost efficient by increasing the number of modules employed due to the repetition involved. It is our view that a more traditional method of construction would be best suited to this site.
- The modular form of construction was used for the Lewisham Council development at PLACE/Ladywell, but at this location the requirement was for a building to provide temporary and redeployable accommodation for families. The proposed Mayfields development is for permanent homes and as such the proposals are not suitable.
- We consider that this approach to the design of the buildings and their layout on the site disregards key principles of The Housing Supplementary Guidance for London and

consequently, will have a deleterious effect on the quality of life for both existing and future residents of the area.

- Mature trees are being removed from the site un-necessarily. A more suitable development could be carried out on this site to provide permanent housing for Lewisham residents which would meet the requirements of The Guidance and fit in with the local streetscape. This development could provide family homes with private gardens and parking for residents and visitors with the potential to enhance rather than blight the local area.
- This submission should be read in conjunction with the individual submissions made earlier. This submission reinforces the views of the individuals and is presented as a group submission as requested at the public meeting on 13/12/17.

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