

Committee	STRATEGIC PLANNING COMMITTEE (ADDENDUM)
Report Title	Land at Sydenham Hill Estate, London, SE26
Ward	Forest Hill
Contributors	David Robinson

Reg. Nos.

DC/20/115160

1.0 INTRODUCTION

- 1.1 This report has been prepared as additional representations objecting (24 no. at the time of writing) to the proposed development have been received since the agenda has been published, as well as one letter of support. Additionally, an updated Social Infrastructure Study has been received from the applicant, and several errors in the Officer Report have been corrected.

2.0 SUMMARY OF ADDITIONAL RESPONSES

- 2.1 The additional responses have been summarised as follows:

- The application is of an inappropriate scale and density
 - Four of the GP surgeries listed in the report do not accept patients from the application site vicinity
 - The application is contrary to Lewisham Core Strategy Policies 15, 17 and 18
 - Concerns in relation to the late publication of additional documentation
 - The comments of the Council's Senior Conservation Officer must be taken into account
 - The scheme is unacceptable and therefore should be redesigned. Comments from the Senior Conservation Officer, Tree Officer and Design Review Panel reflect this.
 - A renewed request for Tree Protection Order (TPO) on T48
 - The public have not had adequate time to comment on new documents uploaded to the Council's website
- 2.2 Comments in relation to the scale and density of the proposed development are noted and addressed in the Committee Report.
- 2.3 The Senior Conservation Response is included in full in the committee report and has been published as a background document. The response is considered fully in the officer assessment.

3.0 CONSIDERATIONS

Amendments to Original Report

- 3.1 Table 3 – the number of 4B6P units should read **8** (not 6).
- 3.2 Paragraph 334 – The proposed quantum of 3+ bedroom affordable housing is **20%** (not 18%) of the total affordable provision.
- 3.3 Paragraph 768 – “A total of **45** (not 39) trees will be planted”

- 3.4 Following the submission of an updated Social Infrastructure Study, paragraphs 395-397 have been amended (new figures in bold with previous figures in brackets):
- 395 The Infrastructure Study indicates that here are **11,445** (previously 11,121) pupils at schools within 1,600m of the site with **11,317** (previously 11,343) places available. This represents 98.04% of capacity with less capacity available within the Study Area compared with Lewisham as a whole.
- 396 This is partly due to an anomaly with data identified for the Kingsdale Foundation School which the dataset identifies has **2,211** (previously 1,900) pupils for only **1,250** (previously 1,250) spaces. When this anomaly is discounted, the total number of pupils is **9,234** (previously 9,221) and spaces **10,067** (previously 10,020), meaning **91.7%** (previously 92.03%) of all spaces are occupied at schools within 1,600m of the Study Area.
- 397 Using the proposed development mix, the proposals will yield 271 (271.4) additional residents, including 93 (92.8) children. The age distribution of the population is shown below. The GLA population calculator estimates that 14% of the additional population resulting from the proposals will be 0-3 years and therefore of a nursery age. A further 11% of the additional population are estimated to be 5-11 years and 9% of the additional population will be children aged 12-17 years.

Additional Public Representations

GP Surgery Spaces

- 3.5 Officers have reviewed comments from the public in relation to GP surgery provision in proximity to the application site and note that four GP surgeries are not currently accepting new patients from the application site address. The four GP surgeries are as follows:
- Lordship Lane Practice
 - Paxton Green Group Practice
 - Woolstone Medical Centre
 - Forest Hill Group Practice
- 3.6 Three GP surgeries continue to accept new patients from the application site address (Wells Park Practice, Vale Medical Centre and Sydenham Green Group Practice) and the conclusions of the report in that there is sufficient existing capacity in relation to healthcare facilities in the area remain the unchanged.

Non Compliance with Core Strategy Policy

- 3.7 Core Strategy Policy 15 (High Quality Design for Lewisham) states that development within Areas of Stability and Managed Change should achieve the following design aims:
- a. The scale and type of development will generally be smaller scale than other parts of the borough respecting conservation areas, listed buildings and the scale of surrounding residential character.
 - b. Small scale development, including infill development, will need to be designed and laid out to, complement the character of surrounding development, provide suitable residential accommodation with a high level of

amenity and provide for garden and amenity space. Any adverse impact on neighbouring amenity, conservation areas and designated and non designated heritage assets, biodiversity or open space will need to be addressed.

- c. Redevelopment opportunities near stations may provide scope for higher density redevelopment. The primary considerations will be accessibility to public transport, local character and urban design principles which aim to establish place making a part of any redevelopment.
- d. Small household extensions and adaptations to existing housing will need to be designed to enhance the street scene, protect neighbour amenity and ensure that the living conditions proposed are satisfactory.
- e. Conservation areas will be protected from inappropriate built development and change that enhances residential character will be considered acceptable.
- f. Development should enhance the identity and distinctiveness of Downham District Centre.

3.8 Core Strategy Policy 16 (Conservation areas, heritage assets and the historic environment) states that the Council will ensure that the value and significance of the borough's heritage assets and their settings, which include the Maritime Greenwich World Heritage Site, conservation areas, listed buildings, archaeological remains, registered historic parks and gardens and other non designated assets such as locally listed buildings, will continue to be monitored, reviewed, enhanced and conserved according to the requirements of government planning policy guidance, the London Plan policies, local policy and English Heritage best practice.

3.9 Core Strategy Policy 17 (The protected vistas, the London panorama and local views, landmarks and panoramas) states that to protect their role in creating identity and assisting wayfinding:

- a. protected vistas and the London panorama, will be managed in accordance with strategic and local guidelines, specifically the London Plan policies and the London Plan Supplementary Planning Guidance View Management Framework
- b. local views, landmarks and panoramas identified on the Proposals Map will be managed to ensure that new development does not impede or detract from local views or obscure local landmarks.

3.10 Core Strategy Policy 18 (The location and design of tall buildings) states that tall buildings will be considered inappropriate where they would cause harm to the identified qualities of the local character, heritage assets, landscape and open space features listed below:

- a. World Heritage Site of Maritime Greenwich, the setting of the World Heritage Site, and the World Heritage Site Buffer Zone
- b. London panoramas, protected vistas as defined in the London Plan and local views and landmarks
- c. Conservation areas and their settings
- d. Metropolitan Open Land and other open spaces including London squares
- e. historic parks and gardens
- f. listed buildings and their settings
- g. Sydenham Ridge Area of Special Character, which comprises a topographical feature where tall or bulky buildings would affect the skyline and have an adverse effect on the landscape and local residential amenity

- h. riverside environments where tall buildings might harm biodiversity interests through overshadowing
- i. existing residential environments and their amenity.

3.11 The impact of the proposed development on heritage assets is well documented in the Officer Report. Officers have identified that less than substantial harm would be caused to heritage assets and in accordance with Paragraph 196 of the NPPF, the public benefits of the proposed development have been weighed against this harm (which has duly been given great weight). Members are advised that the proposed development would conflict with the Core Strategy with regard to the impacts on heritage assets.

3.12 With regard to the impact of the proposed development on the Sydenham Ridge Area of Special Character specifically, the appearance of the proposed tall building on the ridge has been fully considered with a range of views of the proposed development having been provided by the applicant in their submission.

3.13 Full consideration of the proposed design has been outlined in the Urban Design section of the officer report.

Scheme Redesign

3.14 Representations have been received in relation to the scheme being redesigned in light of comments from the Council's Senior Conservation Officer, Tree Officer and Design Review Panel.

3.15 The comments from these consultees have all been reported and discussed in the Committee Report. It is not the role of the Council's Senior Conservation Officer, Tree Officer and Design Review Panel to advise whether a scheme is acceptable on the whole. These consultees provide comments solely in relation to their specific area i.e. design, impact on heritage, impact on trees. The role of assessing the acceptability of the scheme overall falls to the Planning Officer who must consider these comments in the round, in light of all planning considerations as part of the planning balance exercise.

Tree Protection Order Request

3.16 The requests for Tree Protection Orders have been noted in the officer report and addressed in paragraph 790 which states:

790 The assessment of these trees finds that whilst some may merit protection on amenity grounds, it may not be expedient to make a formal Tree Preservation Order. This is because it is unnecessary where trees are subject of existing good arboricultural management. In this instance, the trees and wider estate are under good management by City of London. The TPO requests for the trees identified do not reflect the wider importance of trees throughout the estate. Whilst some are defensible, two of the more significant trees to public realm amenity are to be retained. TPO regulations guide against making TPOs where trees are under good management. Therefore the Tree Officer has declined to make a Tree Preservation Order in this case.

3.17 Officers note that the TPO request is in relation to T48, which is not proposed for removal but would require lateral reduction. Full details of works to trees would be required prior to commencement through a Tree Protection Plan and an Arboricultural Method Statement.

Consultation of Additional Documents

- 3.18 Representations have been received in relation to no consultation having been carried out in relation to additional documents which have been made public on the Council's website.
- 3.19 The NPPG states that where an application has been amended it is up to the local planning authority to decide whether further publicity and consultation is necessary in the interests of fairness. In deciding what further steps may be required local planning authorities should consider whether, without re-consultation, any of those who were entitled to be consulted on the application would be deprived of the opportunity to make any representations that they may have wanted to make on the application as amended.
- 3.20 Lewisham's Statement of Community Involvement states that the re-notification of changes to an application will be undertaken at the discretion of the Council having regard to the nature and extent of the change and its impact on the local area and those who have made representations.
- 3.21 The additional documents include all consultation responses (internal and external), the applicant's response to the Senior Conservation Officer comments, Heritage Statement and TVIA addendum, an updated Ecology Report, Urban Greening Factor Score and Social Infrastructure Survey and the Design Review Panel responses. Public reconsultation has not been undertaken in this instance due to the nature of the documents which have been made public and that the proposed development has not been amended. As such, officers do not consider that any of those who are entitled to be consulted on the application would be deprived of the opportunity to make any representations that they may have wanted to make on the application as amended. Those who are entitled to be consulted on the application have been, and have made representations as they saw fit – given the proposed development has not changed, it is not considered necessary for reconsultation to occur.

4.0 CONCLUSION

- 4.1 The additional representations and updated Social Infrastructure Survey have been reviewed and are not considered to change the assessment undertaken or the conclusion and recommendation of the officer report to committee.