

## **Old Fire Station, 199 Perry Vale, DC/10/74984**

I am writing on behalf of the Forest Hill Society to object to planning application DC/10/74984. We recognise that this is a good site for housing (as has been the case in the past) and bringing this listed building back into use is to be welcomed. However, there are a number of concerns we have about this application.

### **1. Social Housing**

None of the units are intended as social housing. The developer points to Lewisham policies which talk about 15 units requiring social housing, however this has been superseded by the London Plan which recommends social housing for developments of 10 or more units.

London Plan (Interim Housing Supplementary Planning Guidance): *"Any site suitable for housing provision should normally be considered suitable to provide some affordable housing, and Policy 3A.11 makes clear that affordable housing policy must be applied to all sites with capacity to provide 10 or more homes."*  
<http://www.london.gov.uk/sites/default/files/spg-housing-interim-apr2010.pdf>, paragraph 4.37

As this development has 13 units, not including the ground floor space which is the subject of a separate planning application, we believe that some social housing provision is appropriate. Without such an undertaking we believe this development should be rejected as contrary to London planning guidance.

### **2. Parking**

There is a discrepancy in parking spaces between the application form and the plot plan which shows external areas of the site. In the application form it is stated that there will be 3 car spaces plus 1 disability space. However, looking at the plan only two car parking spaces are shown and these are noted as being reserved for the ground floor occupants, which is outside of this planning application (other than one flat). We therefore consider that this application has only one parking space provided for the 13 flats included in the application. With this number of flats, including 4 with multiple bedrooms, there is a need for parking to be provided.

On street parking is limited due to the bus stop and double yellow lines outside the development as well as neighbouring houses with driveways. This will lead to more parking on neighbouring roads including parking outside the shops on Perry Vale. An increase in long-stay residential parking in this location will be detrimental to the viability of this small parade of shops and to users of The Vale Medical Centre, who rely on short-stay parking being available directly outside.

In relation to parking the developer has stated in the design and access statement that they regard this as a sustainable living area. This is not supported by the Unitary Development Plan which shows the nearest area regarded as a sustainable living area towards the other end of Perry Vale, at the junction with Dacres Road. Although this site is reasonably well served by buses, it is at least 10 minutes walking distance from Forest Hill town centre and railway station. We do not believe that this site justifies consideration as a sustainable living area and as such a greater level of parking provision should be required for this number of units. For this reason we do not accept that this scheme is in accordance with council policy HSG 17 relating to sustainable living areas.

### **3. Internal Layout**

There are some concerns about the internal layout. In particular the size of the kitchens in flats 3, 4, 5 and 7. We believe that this is an indication of poor quality design and overdevelopment of this site, for this reason the application should be regarded as contrary to council policy URB 3 relating to Urban Design.

### **4. Garden Space**

Council policy HSG 7 (Gardens) states: *"The Council will seek in all new dwellings the provision of a readily accessible, secure, private and usable external space. Family dwellings should be provided with their own private garden area."*

There is no plan for a private garden for the family unit in this development, nor would it be reasonable to suggest that the rear of this property provides adequate amenity for the 13 flats and the future users of the ground floor units not included in this application.

For the reasons stated above the Forest Hill Society recommends rejection of this application, although we do hope that a more suitable application can be put forward in the future to bring this site back into use.