

I write on behalf of the Forest Hill Society to object to the current application.

While we have no objections in principle to the future use of this site for housing, we find many aspects of the current proposal undesirable and unacceptable to local residents and wish to make the following comments:

### **1. Scale.**

The plans for 4 and 5 storey blocks of flats for the most part, are seriously out of keeping with their context on this site, which is suburban & surrounded predominantly with 2 storey houses with gardens. There are also substantial overlooking issues exacerbated by the proposed balconies to the flats, and the 3-4 planned blocks will present as over dominant and overbearing to residents of the area. Any sense of privacy will be unreasonably compromised. The topography further emphasises the prominence of the blocks when viewed from further down this sloping terrain.

### **2. Massing.**

The proposed 59 flats in 3 blocks is far too dense for this site. The footprint of the plans cover almost the entire site up to the boundaries in places, leaving very little useful room for amenity space or soft landscaping for this many dwellings. Proximity to boundaries will also leave neighbouring residents with rather stark visual impacts & less daylight in places.

The rather cramped courtyard proposed to the rear (west) will be overshadowed by the tall buildings, receive very little direct sunlight and the usefulness of this relatively small space to the number of proposed residents is questionable.

### **3. Parking Provision.**

We note the intended provision of 6 wheelchair user dwellings, but only 2 disabled parking bays fronting on to Acorn Way are planned. Off street parking provision is otherwise totally absent from this plan, which we feel is completely unacceptable for 59 dwellings in this location.

The plans assume parking is available on the full length of Mayow Road, but local residents know the road is already not navigable to buses and heavy vehicles when vehicles park on both sides. There are particular stress problems on schooldays with 2 nearby school sites.

Residents of small side streets/closes, particularly Acorn Way, April Glen and Wynnell Road are consequently likely to experience severe parking stress.

The parking survey also took no account of the likely impact of several other residential developments currently planned in the area.

### **4. Transport.**

Related to the likely parking problems is the current lack of transport infrastructure serving this area. Rail is accessible but only at the outer margin of accessibility for many, and the sole bus route is the No 75 which is infrequent, very slow due to the problems referred to above, and which is in any case at capacity during school starting & finishing times. It also does not route close to either rail station, raising accessibility issues for those without private transport whose mobility is compromised.

The applicant is fully aware of these problems since their response at the last public meeting was to promise a condition of sale to buyers that they did not maintain cars...I know of no way to enforce such a condition and peoples' circumstances do also change.

## **5. Landscaping and Arboricultural Implications**

The applicant promises "extensive landscaping, communal areas and play space", while in practice leaving little room for this to be provided.

Neighbouring properties are all well set back from streets though to a varying extent, presenting a much softer, less hostile streetscape, and these plans encroach much further on this varied but accepted line. The existing building and those neighbouring to the south are set back some 20 metres from Mayow Road. Private front gardens, a school, and Mayow Park host a variety of mature trees and Mayow Road consequently has the appeal of a leafy suburban tree lined avenue, despite the lack of municipal street trees. Little room is left in this plan to maintain that feel, and a poor precedent for maintaining the character of the area in future will be established.

In total at least 23 trees with heights of up to 14 metres will be removed from the site, while others will be impacted by incursion into their root protection areas. None of the trees are central to the site but populate predominantly the western and southern boundaries. They become a problem only due to the over intensive plan to build almost up to the present boundaries. Most could otherwise be retained to soften the visual impact of the development on neighbouring residents.

Of particular concern is the proposed removal of a 14 metre English Oak (T16) on the western boundary, and the removal of tree (T1) to the south. This is not even part of the site but some 5 metres away to the streetfront of neighbouring property 22 Mayow Road. It is a statuesque mature Turkey Oak of 13 metres height and one of a distinctive pair that contribute hugely to the streetscape. They are both also currently the subject of Tree Preservation Orders.

Tree T1 still appears in CGI's submitted as part of the plans as if to illustrate its importance to the streetscape, when it is in fact planned to remove it.

Being to the south of the proposed block B it is a perceived problem that they may cast shade on the new block, whereas the actual problem again is the plan to build too close to that boundary. The limited ornamental tree and shrub planting planned is no replacement for such specimens. In this respect the plan demonstrably fails therefore to comply with NPPF S12 & 15, G7 of the draft London Plan, CS12 of Core strategy, & DM 25 of Lewisham Local Plan.

## **6. Community Engagement**

We note the extensive consultations referred to in the community statement and took part in the initial public pre-application meeting in May. However, it seems clear that almost nothing has changed in the original plans as a result.

Assurances given to residents and councilors are not reflected in these submitted plans.

We would welcome a more frank and honest engagement process.

We welcome the principle of redeveloping this redundant site with much needed local housing, but feel this scheme is very inappropriate in this location for the reasons stated above. A more acceptable plan that enhances the surrounding area, addresses neighbouring local residents concerns, pays greater consideration to the wellbeing of future residents to be housed here, and reduces the visual & environmental impacts mentioned should be encouraged.

Subsequent addendum:

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We don't consider the proposed parking provision to be acceptable, for the following reasons:

**(i) Underestimation of parking demand**

The site is located half a mile from local amenities and we don't believe such a distance is conducive to attracting as large a number of car-free residents as the applicant envisages.

We note that the applicant has dropped the idea of a 'car-ownership-free' development (via the introduction of a CPZ and the non-granting of parking permits to this development's occupants) and instead has calculated a potential demand of 21 car parking spaces. They suggest that demand for parking will be self-regulating based on the capacity of on-street parking and that 21 spaces will be a realistic number, despite the London Plan's calculation of a maximum parking standard of 62 spaces, and the Emerging London Plan's calculation of 44 spaces. We don't believe that 21 spaces for 59 units is sufficient and ask that adequate parking provision should be made in line with at least the Emerging London Plan's standard.

**(ii) Overestimation of available parking on Mayow Road**

Based on local knowledge and experience, we believe that surveys which identify parking spaces on Mayow Road based solely on visibly unused parking space are simplistic and inaccurate. For most of the length of Mayow Road, traffic flow is single file when cars are parked on both sides of the road (and in the case of buses it becomes single file when cars are parked on only one side). Although parking surveys capture areas where parking is not permissible (eg in front of drop kerbs, bus stops etc) they don't identify the need for areas of non-parking to enable the flow of traffic. Areas of non-parking act as passing bays (particularly vital when buses are travelling along the road) and an increase of on-street parking would reduce these natural passing bays and disrupt the flow of traffic to an even worse level.

**(iii) Additional increased parking from nearby developments**

There are two new residential developments nearby: Bampton Estate (DC/19/112918: 39 residential units, which has been granted) and the former warehouse site further along Mayow Road (DC/19/113521: 32 residential units, still under consideration).

Unlike this application, the Bampton Estate development is to include on-site parking spaces (20 spaces), although partly to accommodate the excess parking by current residents on the Estate, which has exceeded on-site capacity. We think this demonstrates not only a need for on-site parking on large residential developments but also that parking will exceed what developers estimate it to be.

The former warehouse application does not include any on-site parking and, similarly to this application, estimates low levels of parking demand which they claim can be met by on-street parking.

However, the potential on-street parking areas of these two developments overlap with this applicant's on-street parking areas, i.e. parts of Inglemere Road, Mayow Road, Dacres Road and Queenswood Road. On-street parking capacity should therefore not be considered in isolation of a single application but should include potential increased demand from nearby new developments.

We believe that applicants' tendencies to underestimate parking demand, together with additional demand from nearby developments, will result in an increase in on-street parking that will exceed the applicant's conservative estimate. This will be detrimental to the surrounding streets and will further impede the flow of traffic along Mayow Road. We therefore argue that a development of 59 units with no on-site parking will generate a level of parking demand that is untenable in this location.