

DC/09/73111/X: Phoenix Works, Bird-in-Hand Passage, London, SE23 3HW

I am writing on behalf of the Forest Hill Society. I wish to object to this planning application on the following grounds:

1. Safety and emergency services

Given the poor accessibility and physical restrictions of this site, and some particular features of the proposed design, I believe that an assessment is needed of whether this proposal is safe for the site.

1.1 Emergency access and density of dwellings

The site is only accessible by road from Bird in Hand Passage (a cul-de-sac) and is bound by the railway on one side; the wall of a car-park on another; and the backs of properties on Dartmouth Road on the fourth side. The two main residential entrances face the railway line and are reached on foot from Bird in Hand Passage. The fact that the original planning application was granted suggests that the previous density level was deemed acceptable to achieve safe emergency access and evacuation.

However the proposed number of bedrooms has increased from 32 to 77, more than doubling the number of inhabitants. I would ask that an assessment be made of whether emergency access and evacuation can still be achieved to a safe standard, given the large increase in the number of inhabitants.

1.2 Internal courtyards and internal shared terrace

The internal courtyards and terrace are completely surrounded by the building. Does this comply with the Building Regulations for fire safety? In the event of fire, anyone in the courtyard or terrace would need to re-enter their flat in order to exit the building.

Building Regulations, Approved Document B (Fire safety) states that

“... a courtyard or back garden from which there is no exit other than through other buildings would have to be at least as deep as the dwellinghouse is high to be acceptable ...”

The proposed courtyards and terrace are surrounded by 3- and 4-storey buildings. Is this acceptable?

1.3 Separate access to Units 1-4

Units 1-4 are located on the opposite side of the development to the main entrances, and are to be accessed via a lane leading off Dartmouth Road, not from Bird in Hand Passage from where the rest of the development is accessed. There is no perimeter route linking the two parts of the development. Might having two separate routes to the development hinder the emergency services finding Units 1-4?

2. Density

Although the number of residential units has only increased from 24 to 26, it is proposed to increase the number of bedrooms from 32 to 77. The density level is equivalent to 950 habitable rooms per hectare, way beyond Lewisham's range of 180-210 habitable rooms per hectare. Even allowing for the site being in a Sustainable Living Area, a density level of 950 is too high for this site.

Given my concerns about access by the emergency services as set out in paragraph 1 above, I suggest that the parameters for density on this particular site should include consideration of the maximum number of people who could be accommodated safely.

3. Family dwellings: lack of private amenity space

Of the 17 family dwellings (units with 3+ bedrooms), 2 have sole use of individual courtyards and 3 have access to a shared internal terrace. For the reasons outlined in 'Safety and emergency services' above, I have doubts as to whether these internal spaces are a viable part of the development's design. In any case, the internal terrace is not a private space in terms of access or overlooking, and the two courtyards would also be easily overlooked. The other 12 family dwellings only have access to balconies, which is not suitable amenity space and is contrary to Lewisham's policy HSG 7 Gardens:

"HSG 7 Gardens

The Council will seek in all new dwellings the provision of a readily accessible, secure, private and useable external space. Family dwellings should be provided with their own private garden area. Normally, a minimum garden depth of 9 metres will be required."

4. Parking

We are disappointed that there are no parking spaces and think it unrealistic that so many families would be prepared to inhabit accommodation with no access to parking facilities.

5. Cycle storage

Provision appears to have been made for one bicycle per residential unit. Although this is in line with Lewisham's current standards, we feel that the standard set out in the Mayor of London's draft 'London Plan' of 2 bicycles per 3+ bed unit would be more appropriate, especially as there are 17 such units in this development. This would mean at least 43 spaces for the residential units plus provision for the commercial units.

6. Commercial units

None of the commercial units have toilet facilities indicated. Is this merely an omission from the floor plans? Units B, C, D and E appear to have little natural light and we wonder what the likely use of these units would be, especially Unit E which is very large with access via a narrow corridor down some steps.

7. Access to Units 1-4

Access to these units is solely from a lane off Dartmouth Road and not from Bird in Hand Passage. This would confuse the 'identity' of these units in relation to the rest of the development, and even their address, as the lane appears to be nameless.

The location of the individual entrances to each unit is not particularly desirable. Only the entrances to Units 2 and 3 are likely to be visible from the lane entrance on Dartmouth Road. The entrances to Units 1 and 4 are hidden from view and this would not give a feeling of safety and security.

The entrances are very close to the boundary of the site and have to be approached over land that is not within the boundary. Who owns this land and are there any issues about rights of way?

It is stated that arrangements will be made to transfer the domestic refuse collection to and from the collection point in Bird in Hand Passage. As there is no path around the perimeter of the development, this would entail taking the refuse up the lane, along Dartmouth Road, and down Bird in Hand Passage. This would not be necessary if the development had been designed in such a way that all units were accessed from Bird in Hand Passage. I also note that the proposed site of the refuse store next to Unit 4 is outside the site boundary.

The provision of these 4 units seems to be an attempt to maximise the number of units on the site, with little consideration of the problems arising from their unusual access arrangements.