

DC/18/106504 | the construction of one (1) part four/part five storey building to provide fifty (50) over 60s dwelling units, BAMPTON ESTATE, BAMPTON ROAD, LONDON SE23 2AX

I am writing on behalf of the Forest Hill Society to object to the planning application DC/18/106504, for the construction of fifty new flats on Windrush Lane / Bampton Road.

The Forest Hill Society are the local amenity society for the area covered by SE23 and have around 400 members. The society is keen to ensure that the area develops in a positive way that supports the economic, environmental and social well-being of the people that live and work in it. Generally we try to be positive about changes to the area and proposals for improvements, however in some cases it is necessary for us to raise concerns about proposals as part of the planning process.

We write to object to the above proposals for the following reasons:

1. Impact of daylight for existing residents
2. Lack of daylight in units in the new development
3. Overlooking & Loss of Privacy
4. Over-development of the site
5. Lack of details for the Northmoor blocks within the Bampton Estate
6. Impact on parking

Daylight Impacts for Existing Residents

There are a total of 12 windows, in 12 existing residences that fail the Vertical Sky Component test. This appears to include a number of living rooms in these units. Of particular concern are windows 25, 26, 27, 28 of Standlake Point, all of which already receive less than 25% and that is cut down to between 6% and 11%, with light ratios between 0.4 and 0.64 – well below the 0.8 minimum.

There are numerous other windows where the ratio is below 0.8 its former sunlight hours – windows 31, 32, 33, 34, 35 on Standlake Point, and on Fifield Path - windows 98, 99, 100, 101, 103, 104, 105, 106, 108, 109, 110, 113, 114, 115, 116, 118, 119, 120, 121, 126, 127, 128, 129, 131, 132, 133, 134, 139, 144.

The report states that:

The [daylight assessment] results confirm that the proposed development does not fully comply with the BRE numerical guidelines. However, the guide makes clear that, in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings.

The BRE guidance in relation to high rise buildings is meant to refer to the loss of daylight as a

result of new high rise buildings, in this proposed development, it is not the high rise development that is causing the failure to comply with the BRE guidelines, but from the new building of 4-5 storeys. Since this cannot be considered 'high rise' in its own right, we ask that the council reject this excuse for loss of daylight to existing properties in the Bampton Estate, including both existing high rise and terraced properties.

This loss of daylight for numerous properties in the Bampton Estate are contrary to the BRE guidelines and **demonstrates inappropriate and overdevelopment of the site.**

Daylight Impacts for New Units

Looking at the Average Daylight Factors for living rooms in new units, thirteen of these fail these tests. This is not primarily due to building close to high rise, but as a result of overly dense development of the area. We do not believe that this demonstrates quality living accommodation in this development and again **demonstrates inappropriate and overdevelopment of the site.**

Overlooking & Loss of Privacy

Residents of existing properties in Fifield Path will be overlooked by flats in the new block. The distances between facing windows will be 16.75m and approximately 19m for two parts of the new block. A number of windows of habitable rooms in Standlake Point will also be less than 20m from facing windows in the new development.

The London Plan 2016 - Housing Supplementary Planning Guidance, section 2.3.36 states:

Design and access statements should demonstrate how the design as a whole uses a variety of measures to provide adequate visual and acoustic privacy for every home in a development. designers should consider the position and aspect of habitable rooms, gardens and balconies, and avoid windows facing each other where privacy distances are tight.

In the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 – 21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). These can still be useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city, and can sometimes unnecessarily restrict density.

Although the guidance indicates that there are circumstances where distance between facing windows can be less than 21m, we do not accept that adequate mitigation measures have been made to justify this massive reduction in privacy for residents, accompanied by a significant loss of daylight, and the replacement of an outlook of a green space with a four storey block that takes up the entire vista.

A layout with the new block at a greater distance would reduce overlooking and loss of daylight. There is no precedent in the streetscape for this density of development, and the use of green amenity space should allow for a more sympathetic layout for this site.

The loss of privacy for residents of Fifield Path and Standlake Point once again **demonstrates inappropriate and overdevelopment of the site with an unreasonable impact on existing residents.**

Plans for the Northmoor Blocks

We welcome the plan to move 24 residents from the existing Northmoor blocks into the new accommodation (as stated in the Design and Access Statement, p7). However, no details have been provided on the plans for demolition or development of the Northmoor blocks. Given that Lewisham Homes is likely to want to make use of this section of the site rather, than leave the units empty, we believe that Lewisham Homes should be transparent about their intention for this site and for the cumulative impact across the whole site should be taken into account when considering density, sunlight impact for existing residents, and parking and transport issues.

We believe it would be more appropriate for this application to include outline planning permission for buildings around Northmoor, so that the cumulative impact can be fully assessed before any permission is granted.

Parking

The report states:

4.7 There are currently 27 dedicated parking spaces across the Bampton Estate. Further, the parking survey recorded 52 - 56 vehicles parked within the site boundary on 2 weekday periods. The additional 25 - 29 vehicles were parked informally on - street within the carriageway, footway and verges.

4.8 As part of the development proposals, it is proposed to reconfigure the on - site parking to provide 54 dedicated spaces in total; this is an up - lift of 27 new dedicated parking spaces. This will provide a significant improvement to the management of the estate parking. The proposals will also result in the loss of 7 garages currently on the site. As outlined, it is considered unlikely that these garages are currently used for car storage, as they are unlikely to be practical for modern cars.

The overall impact of the proposed development is a zero increase in the number of car parking spaces on the site, and arguably the loss of seven garages which could potentially be used for car storage. In addition to this on site parking, residents already make use of some spare capacity on

the public highway. Any additional increase in the number of units on this site will lead to further parking problems for existing residents, new residents and residents in neighbouring roads, particularly Bampton Road and Perry Vale. Both Bampton Road and Perry Vale are narrow roads, and Perry Vale is a bus route. When cars are parked on both sides of Perry Vale it restricts the flow of traffic as the road is not quite wide enough for two large cars to pass each other. For this reason local residents usually refrain from parking on the south side of Perry Vale. To increase the parking on this road will lead to problems for traffic flow, including buses, and may well push some traffic onto other roads.

We recognise that it may not be desirable to increase the amount of car parking on the estate and some of our concerns would be mitigated by dedicated bays for car club parking, which may reduce overall demand for cars in the vicinity.

In the short term existing residents may be disadvantaged by the 11 dedicated electric parking bays. These are all new electric parking bays, so it is unlikely that any of the existing residents parking on site have fully electric vehicles. If these bays are for electric vehicles only, then this would reduce parking capacity for existing residents, creating more demand for on street parking in surrounding roads. To avoid this happening the parking bays for electric vehicles would need to be available for non-electric vehicles.

The provision of 52 bicycle parking spaces for residents who are all over 60, and will have varying levels of mobility, would appear to be unnecessarily generous. While we welcome bicycle parking we believe that it is on the wrong side of the development, with access only from Fifield Path, rather than via Windrush Lane, which includes the new bicycle path, and easy access to Perry Vale. We would also question the suitability of the double height stackers for bicycle storage in a development for older people.

Ball Court

We welcome the replacement and upgrading of the ball court. We would ask that if planning permission is granted to any scheme on this site, that a condition is imposed that the new ball court is constructed prior to the closure and redevelopment of the existing court, so that children in the existing blocks have somewhere to play during the major construction period, when little of the amenity space on the site will be accessible to them.

Bat Survey and Bird Habitat

With the loss of 44 trees from the site, including 2 category B trees, there is concern that there will be a loss of habit for bats and other birds. For a site such as this, we believe a bat survey should be undertaken, and would encourage the installation of roosting boxes for bats as well as for swifts in the development.

We are unaware of black redstarts in the local area that would benefit from the rubble-type roof habitat, and given that the roof will be seen from higher level flats in existing blocks, we would suggest that a greener roof environment may be more appropriate for the setting, both for wildlife and for residents.

Conclusion

For the reasons stated above it is our opinion that this development should be rejected as it is laid out at present. The loss of amenity space in an area of Lewisham with a lack of open green space is disappointing to residents who make good use of this space. The proposed development places too great an impact on existing residents, who should be entitled to a reasonable level of daylight and privacy, due to over development of the site. There has been inadequate consideration of the site as a whole, particularly the future of the Northmoor blocks.