

[EXAMPLE DRAFT LETTER]

Dear Suzanne White,

RE: Planning Application DC/16/095039: [LAND NORTH OF REGINALD ROAD & SOUTH OF FRANKHAM STREET, LONDON, SE8 4RL]

We wish to make you aware of a number of strong objections that we have with regard to the proposed development of the land north of Reginald Road (Old Tidemill School), application number referenced above. As a local stakeholder/resident to the site of the proposed development, we are of the view that the proposed development will have a serious impact on our standard of living.

Please can you confirm receipt of this email.

[Name and full address here]

Our specific objections are as follows:

[PLEASE THEN CHOOSE 3-4 SECTIONS ALONG WITH ANY OTHER OBJECTIONS YOU HAVE ...AND DELETE THIS!]

- 1. BUILDING MASSING***
- 2. LOSS OF PRIVACY AND OVERLOOKING***
- 3. PARKING PROVISION***
- 4. OVERALL IMPACT OF THE DEVELOPMENT***
- 5. ENVIRONMENT - CLIMATE CHANGE, BIO-DIVERSITY AND AIR QUALITY***
- 6. CLEAN AIR LONDON***
- 7. FLOOD RISK***
- 8. ACCESS TO GREEN SPACES***

Building Massing

The Development would by reason of its dimensions/bulk be an incongruous, dominant, prominent feature on the existing old tidemill school building. Two 6 Storey buildings within 8m of habitable spaces is too close and would detract from the period features of the Victorian school buildings.

Elevation 1 - Drawing 029_PL_200 - Omits the development and massing of Blocks B + C to the rear, thus it is not suitable to make a decision without sufficient information. Two 6 Storey buildings will overshadow, deny access to light and be overbearing for the residents of the converted School Building.

The two story extension to the existing school building is not in keeping with the existing heritage and quality of the host building. In contravention of DM policy 31 2d, the new or replacement

windows are not in keeping (size and style) with the existing property. The two storey extension does not comply with Lewisham Policy for developing older buildings.

The typical character of the neighbourhood on Reginald Road and Farnham Street is between 3-4 storeys. As such a building unto 6 storeys in places seems excessive for the area. Lewisham SPD - Residential Standards 2.8 Density "The local character of an area will also affect the density of a development, as all development should be sensitive to its context." This development is not deemed 'sensitive to its context"

Loss of privacy and Overlooking

2.13 Amenity impacts – light, privacy, enclosure in the SPD Residential Standards.

"Normally, unless it can be demonstrated that privacy can be maintained through design, there should be a minimum separation of 21 metres between directly facing habitable room windows on main rear elevations. This separation will be maintained as a general rule but will be applied flexibly dependent on the context of the development. A greater separation distance will be required where higher buildings are involved. The minimum distance between habitable rooms on the main rear elevation and the rear boundary, or flank wall of adjoining development, should normally be 9 metres or more."

The following objections are raised with regard to this policy

The proposed Balconies along the Reginald Road Blocks B and C (Elevation 029_PL_200) would result in unacceptable standards of privacy, unacceptable levels of overlooking and adverse impact of noise for the properties opposite the proposed development on Reginald Road and New Butt Lane. Particularly residents of Reginald Road, Flats 1 - 107.

Whilst the proximity of Buildings B and C are at points as little as 17m from the existing properties along Reginald Road. Given their excessive height for the context, these new dwellings are in contravention of policy 2.13.

Building Block B massing dominant, overbearing and denying access to light for adjacent Princes Louise Building. A 4-6 storey development within 5.8m of an adjacent property is deemed to be overbearing and denies the existing tenants access to Easterly light. The minimum suggested distance according to Lewisham policy is "9m or more".

The West elevation of Block B1 - would result in unacceptable standards of privacy, unacceptable levels of overlooking and adverse impact of noise for the property adjacent the proposed development at 1 Hales Street, particularly as it looks directly into the windows on 1 Hales Street Eastern elevation. Given the unique character of the house design, any windows above will overlook directly into the courtyard spaces

The proposed Balcony details (029_PL_40) - Show Polyester Powder Coated Metal Railings (Point 26) which are not in keeping with the local surroundings. They would also result in unacceptable loss of privacy, no provision has been made for obscured glass to any of the overlooking balconies. These balconies unlike at Princes Louise Building do not make any effort to mitigate noise pollution from affecting neighbouring residents and area, in contravention of Lewisham policy DM26.

Parking Provision

6.13Da - London Plan - Parking Policy

"ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles"

6A.4 - London Plan - Parking Policy

"The starting point for meeting parking demand for new retail development should be use of existing public off-street provision. Parking needs should be assessed taking account of the reduction in demand associated with linked trips. If onsite parking is justified there should be a presumption that it will be publicly available. Boroughs should take a coordinated approach with neighbouring authorities, including those outside London if appropriate, to prevent competition between centres based on parking availability and charges. Further advice on retail parking is provided in the Town Centres SPG."

Point 1 - No indication of electric charging points in the Plans or design and access statement.

Point 2 - Reduction of at least 10 spaces from the Farnham Street Carpark, will have a detrimental affect on local businesses on Deptford High Street. Inadequate public consultation with Market traders regarding how this reduction is to be incorporated within the new development.

Overall Impact of Development

Government Planning Policy Statement PPS3: Housing, Paragraphs 13-14:

"Good design should contribute positively to making places better for people. Design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should not be accepted."

We believe the proposal to contravene this guidance as it is to the detriment of the quality, character and amenity value of the area, as outlined in the points above. This development removes and integral an vital community asset - a wildlife garden 2000sq/m and replaces it with 700sq/m of amenity lawn, which would spend 80% of the day in it's shadow. The designers attempts to hide this with sunny imagery, and a lack of shadow on the site plan is entirely against the planning policies which are their to protect communities.

3.11 Amenity impacts – light, privacy, enclosure in the SPD Residential Standards.

"Attractive or ecologically important existing natural features of a site should be retained where possible – these may include small areas of woodland, natural ponds, large or specimen trees or groups of trees."

I dispute the developers claim that all reasonable consideration was made to retain to garden site. At no point have they shown how the OTWG cannot be retained as part of the new development. At no consultation did they show why alternative plans to retain the site were inappropriate or why the garden could not be retained as part of their development.

Environment - Climate Change, Biodiversity and Air Quality

27 London Plan paragraph 5.11:

“The Mayor expects all development to make the fullest contribution to the mitigation of climate change.”

NPPF paragraph 109:

“minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.”

London Plan Policy 7.19: BIODIVERSITY AND ACCESS TO NATURE

A - The Mayor will work with all relevant partners to ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor’s Biodiversity Strategy. This means planning for nature from the beginning of the development process and taking opportunities for positive gains for nature through the layout, design and materials of development proposals and appropriate biodiversity action plans. Planning decisions: Development proposals should:

A wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity

B prioritise assisting in achieving targets in biodiversity action plans (BAPs) set out in Table 7.3 and/or improve access to nature in areas deficient in accessible wildlife sites

Retaining green infrastructure and encouraging urban greening will be imperative to combatting climate change. Over recent years London has been increasingly susceptible to overheating from climate change and this is exasperated by the urban heat island effect (London Plan, 2015). The 2003 heatwave killed at least 600 people in London (London Plan, 2016). The London Plan sets out a number of greening initiatives to reduce temperature rises such as tree planting and incorporating green space into new developments wherever possible.

The removal of a 2,000 sq/m green lung at the heart of Deptford goes against every principle of Paragraph 5.11. The OTWG is a mature green habitat which has established itself over the past 20 years, to simply remove this garden with little or no attempt to retain it is simply illogical and contravenes the mayors policy.

The proposed replacement would lead to a loss of Biodiversity within Deptford, as the planting schemes cannot match the variety and native species which the garden would retain.

London Plan paragraph 5.5:

“an additional two million trees in London by 2025 to help with both mitigation of and adaptation to climate change”

Incorrect information has been supplied as part of the Design & Access Statement with regard to the number of trees being removed; Page 68-69 Tree Strategy: Indicative Species Palette. A quick count of tree removal drawing DC_16_095039

EXISTING_TREES_TO_BE_REMOVED_AND_RETAINED-430727 shows 73 trees being removed (including 3 clusters) - D&A Statement lists 36 trees and 13 clusters removed, with 64 new trees planted. This leaves Deptford with a net deficiency in the number of trees, and contravenes the London Plan paragraph 5.5.

The London Plan includes a number of important policies related to green infrastructure. This includes policies on sustainable design and construction which promote and protect biodiversity and green infrastructure (Policy 5.3), there is also a drive to promote urban greening with a proposal to increase the amount of surface area greened in the Central Activities Zone by at least 5% by 2030, and a further 5% by 2050 (Policy 5.10). The Plan also sets out to minimise the loss of open space- no net loss of open space designated for protection in LDFs due to new development. It is also important to protect biodiversity habitats- No net loss of designated Sites of Importance for Nature Conservation.

The current proposal indicates a net loss to publicly accessible green space, which goes against the ambitions of (Policy 5.10) of the LDF.

The support for increasing public open space is also reinforced by the Lewisham Open Space Strategy, which states:

Based upon the quantity standard for parks and gardens of 1.41ha per 1000 residents the area of new parks and gardens would have to be an additional 63.5ha which is unlikely to be achieved given the lack of space in our largely residential borough. This places a greater need to protect and enhance existing open space, and to ensure major development sites adequately consider the provision of quality new open space'.

Finally, the Lewisham LLOSS report point 4.7, justifies sites such as OTWG, which are excluded, should still be considered under the same planning provisions relating to larger green spaces included in the study.

4.7 The types of green space that have been excluded from the study, are:

b) Some private green spaces provide a degree of visual amenity and in a few instances may be available to the public on a paid basis; access is either restricted by cost or limited opening hours, thereby excluding the public from general use. However, bringing private green space into public use offers one option for making good deficiencies.

c) Very small areas of public green space have been excluded on the basis that they are difficult to survey and map. However, they still serve valuable functions and the same planning provisions relating to larger green spaces will apply to them.

According to the LLOSS report spaces such as the OTWG should fall under the same planning provisions as larger green open spaces, as such we ask you to consider the existing land use as green amenity space rather than brownfield development.

Clean Air London

"Nitrogen dioxide (NO₂) hourly legal limit for the whole of 2016 has been breached in London in just eight days. World Health Organisation guideline is for no human exposure to NO₂ over 200

micrograms per cubic metre (ug/m3) measured over one hour. The EU legal limit, also in UK law, is 18 hours in a calendar year”

- See more at: <http://cleanair.london/legal/breathtaking-breach-of-no2-annual-legal-limit-in-eight-days/#sthash.mkdzk1li.dpuf>

The Old Tidemill Wildlife Garden lies in an AQMA with an unacceptably high level of air pollution; the proposed additional accommodation of 212 new dwellings on this site will have a significant negative impact on already poor air quality - not to mention the emissions from construction.

Whilst the emissions report states there is no major impact on Deptford, this does not consider the wider impact of a number of developments taking place simultaneously in and around Deptford. We are already subject to unacceptably high levels of air pollution, this is in direct contravention of the European Legal Limit.

Flood Risk

Lewisham Core Strategy and Environmental Agency 2016

“The Environmental Agency (2016) includes The Old Tidemill School Site as a flood risk warning area. Open green space is crucial in flood risk areas to minimise surface water run-off. Crafting Sustainable Urban Drainage Systems (SUDS) will be vital in the coming years if London is to remain adaptable in the face of increasing flooding pressures from climate change (NPPF, Forestry Commission, n.d.). The London Borough of Lewisham’s (2011) core strategy states it will be essential to mitigate against future flood risk as areas become ever more susceptible to more frequent flooding. The core strategy (2011) states “Applicants will need to demonstrate that their proposal will deliver a positive reduction in flood risk to the borough.”

A reduction in the total area of green space, alongside the unsuitable density of the development will increase the pressure on Deptford/Lewishams flooding strategy and does not provide a positive reduction in the flood risk to the borough.

Access to Green Spaces

Lewisham Leisure and Open Spaces Report

4.30 Quantity: There is an existing level of provision of 1.41 ha per 1000 population. The recommended minimum standard of future provision for Parks is 1.41ha per 1000 population across the borough; to reduce the current level and location of provision, given the nature and topography of the borough, would significantly alter the local environment. To maintain the 1.41ha per 1000 population an additional 63.45 ha will be required by 2025.

4.31 It will be practically impossible to achieve the increase of 64 ha required by 2025 due to pressure on development. It would be sensible to address access and quality issues of existing parks and gardens. Enabling greater access to existing open space can help to achieve greater intensity and diversity of usage. Measures which should be considered include:

Working with the community to introduce Community Gardens (Discussed under the typology Allotments and Community Gardens) such as the existing Friendsbury Gardens and Stansted Strip. They vary greatly in size, from a few square metres to a park-sized area of several hectares. Most existing Community Gardens do not own the land they use and are not always in Local Authority ownership but are leased from private land holders. Lewisham is joining forces with Capital Growth (www.capitalgrowth.org) to create 2012 new food growing spaces in London by the year 2012. The Capital Growth web site has a web page for people requesting space and people offering space some of these are back gardens and some residents of Lewisham have placed requests and are offering space. The Lewisham Planning Department should support this initiative.

4.36

The Council should adopt a policy of providing “Good” sites as a minimum, rather than “Average” or “Poor”. A ‘Good’ site is one which provides appropriate infrastructure to facilitate usage, for example, signage, seating and bins, is clean, safe, welcoming, and attractive.

Continue to develop and support Friends Groups for key parks, and recreation ground to increase local involvement and ownership

The Council needs to resist inappropriate development on the areas of Public Open Space (POS) or Urban Green Space (UGS)

In areas identified as being deficient in Public Open Space the Council needs to concentrate its efforts to enhance public access and quality to existing open space, and to negotiate with developers for new small pocket parks provision.

The Council needs to continue working with the community to introduce Community Gardens. This initiative should be supported by the Planning Department.

OTWG is a registered Capital Growth site as well as a registered Pock Park. Having received funding and support from both bodies as well as being granted a lease as a recognized community garden from Lewisham council. As part of the Capital Growth network and the London Pocket Park scheme, OTWG falls under the typology category of ‘Allotments and Community Gardens’, an initiative supported by the Lewisham Planning Department. The current proposals ignore this fact, contravening the intentions of the LLOSS report and the Lewisham Planning Department.

Exploring the potential to achieve greater public access to housing and educational open space where current access is restricted. OTWG fulfills the need for provision for educational open space. The new development makes no allowances for education to take place within the new development