

Amy Lester, Team Leader
Chief Executive's Department
Planning Division
Development Management (5th Floor – hub 2)
PO Box 64529
London SE1P 5LX

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Dear Amy,

**Comments for Planning Application 18/AP/0532
(Re-consultation)**

Thank you for your notification of 31/08/18, inviting me to comment on the amended application as part of the re-consultation for **Application 18/AP/0532 at SEAVINGTON HOUSE AND GARAGES, CHAMPION HILL, LONDON SE5 8BN.**

I submitted a strong objection to this application in its original form on 20th March 2018 and further comments on 6th July 2018.

The amended application has NOT addressed the concerns and breaches of policy raised in my previous comments, which are repeated and expanded on here. I wish to see this letter published in full on the Planning Portal and registered as my objection to the amended application.

I welcome and support the provision of social housing in Southwark so am saddened to see an unacceptable Plan proposed for this site. As a local resident of over twenty years and parent of school age children, I object strongly to the Application on the following grounds.

1. Non Compliance with Council Policy.

In nearly every respect, this Plan contravenes the Policies it needs to and claims to accord with, including:

- a) The London Plan - new housing must respond to Local Character (Policy 7.4) in scale and mass as well as to surrounding buildings in height and must incorporate both "design appropriate to its context" and "inclusive design principles" (meeting the needs of disabled, older and generally less mobile people). New housing should be "attractive, spacious, safe and green" and must "not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings".
- b) Residential Design Standards "Supplementary Planning Document" (2011) - e.g. on Privacy and Security "new development should not cause excessive overshadowing of existing communal amenity spaces or neighbouring properties", it should not have "a negative effect on the amenity, privacy and aesthetics of the surrounding area". Development should "prevent unnecessary problems of overlooking, loss of privacy and disturbance" by achieving minimum distances of 12 metres at the front and 21 metres at the rear of buildings. The Plan does not achieve these minimum distances or offer adequate justification for not doing so. The 12m dark, secluded, unoverlooked 'amenity' area at the southern boundary furthermore does not comply with SPG guidelines on "community safety and crime prevention". The Plan in general does not meet the standards of Secured by Design.
- c) The New Southwark Plan. P55, Designing Out Crime and "creating and maintaining a safe environment". The Met Police's Police Designing Out Crime Officer noted in his statutory response (26/02/18) to the original Application that "Although Secured by Design is mentioned in the Design and Access statement, at this time no Secured by Design application has been forthcoming to us." and that a concern previously raised about the security of the design had remained unaddressed. He quoted pointedly from Paragraphs 58 and 69 of the National Planning Policy Framework, to remind the Council of the role of the planning system in creating "safe and accessible environments where crime

and disorder, and the fear of crime, do not undermine quality of life or community cohesion." He reminded the Council of the Borough's high crime rate and of the need to attach a 'Secured By Design' condition to any permission granted in connection with the application, worded to ensure "that the development will follow the principles and physical security requirements of Secured by Design". He specifically requested incorporation of an air-lock access strategy to keep residents safe inside the new buildings and "continued consultation throughout the design and build of this development, with the South East Designing Out Crime Office" (which he described as "critical"). The Met Police statutory response to the amended application (16/08/18) makes clear that six months later, none of the concerns raised in the DOCO's response to the original application have been addressed and that police request for involvement in the design process has been ignored. The DOPO writes: In relation to this reconsultation, I have reviewed the plans on the Southwark Planning Portal and I have no further comments to make. The comments former DOCO PC Mark O'Callaghan made in relation to the original application on 26th February 2018 are still valid. I would, however, further stress the requirement for the ground floor to be designed with a lobby to improve the security of the building. As Mark previously commented, the layout at present lends itself to being vulnerable and for this block to be permeable to anyone due to the open staircore which can be easily accessed when the main front door is opened. There has not been any further contact made with the Designing Out Crime Unit. The original meeting that Mark had with the architects was for this development and three others in Southwark. I believe it would be very beneficial for the architects/ developers for this development to make contact and meet with our unit to establish detailed SBD requirements and standards for this specific development.

The design team's failure to apply for Secured by Design Accreditation and decision to ignore the Met Police's comments, recommendations and plea for engagement of six months ago, betray a staggering disregard for the

safety of residents of the proposed development. As with so many other aspects of the application, lip service was paid by the design team to a policy not complied with.

2. Errors and Omissions in the Planning and Design and Access Statements.

These have undermined public confidence and trust in the Plan. The topography and character of the site and its surroundings are misrepresented to justify a Plan for buildings whose height, scale and massing would appear disproportionate in relation to neighbouring ones and far more obtrusive on the crown on the hill than any of the 4-5 storey buildings set against the slope of the hill below. The Application fails to acknowledge that the site is on the crown of a very steep hill, except where it chooses to justify its lack of any disabled provision or wheelchair parking. Paragraph 2, Section 2 'Site and Surrounding Area' of the Planning Statement inaccurately states: 'Directly opposite the site is a six storey development (Flats 1-15 Mary Seacole House) which comprises 15 residential units and Dog Kennel Hill Primary School. The East Dulwich Estate lies to the south east.' The site in fact stands "directly opposite" a two storey school (Dog Kennel Hill Primary School), a three storey development (Langford Green) comprising 45 residential units (including single storey dwelling 'The Lodge' directly opposite proposed Block A) and 170 Grove Lane which is part one/part two storey (at the Council's insistence, due to its location). The character of the neighbourhood at the top of the hill is predominantly low rise. The height, scale and massing of the Plan should be informed by those buildings genuinely facing Seavington House. 2 storey Dog Kennel Hill Primary School "directly opposite" the site of Seavington House to the east is completely omitted from the D&A description of 03: The Site and Context (see 3.1, Location and Neighbouring Buildings). Mary Seacole House stands not "directly opposite" Seavington House as suggested by the Application but "directly opposite" the site of a different, as yet unbuilt, private development, 1a Dog Kennel Hill further down the hill, just south of the school. It is five, not six storeys, yet repeatedly described

as six storeys and opposite. There are no six storey buildings 'directly opposite' Seavington House, only 1-3 storey buildings. The only 5 storey building that can be said to be in "close proximity" to the site is Appleshaw House, whose height is offset by its location behind generous landscaping some way down the hill. 1A Dog Kennel Hill, the other 'precedent' cited in the Application for building 5 storeys, ironically does not exist yet due to the constraints on height and frontage imposed by the Council. Southwark's webpage 'New council homes planned for Champion Hill' claims on p.2: "The project team discussed residents' concerns and examined building heights in the surrounding area which range between 3-6 storeys. The proposed height of 5 storeys is considered acceptable because the developments in closest proximity to the proposed site set a precedent for buildings at this height.' It is untrue that developments in closest proximity set such a precedent. Incomplete and misleading descriptions of the Site and Neighbouring Buildings are unacceptable precisely because they lead to such claims. They should not be used to justify the inappropriate height, scale and mass of the Plan. Images in the Design and Application are misleading too. e.g. 6.3 'Building Scale in Context'. Image 03 'View down Champion Hill' is meant to represent the planned 6 storey block in relation to existing 3 storey Langford Green across the road. The buildings are represented as nearly identical in height, the 6th floor of the block conveniently masked by a depiction of foliage. The Application should be rejected on the basis of these multiple omissions, inaccuracies and misleading images alone.

3. Highways Safety

The safety of children, which should be the primary consideration in Planning, seems to have been completely sidelined in this scheme. The proposed Siting of Block A on the corner of an already dangerous junction directly opposite Dog Kennel Hill Primary School is unacceptable. The proximity of the school to the site and high numbers of school age children negotiating the junction daily (whose footfall will increase when Charter East Dulwich

opens on East Dulwich Grove) have barely been taken into account by the Plan. Sightlines around the junction would be dangerously compromised for all road users by the planned proximity of buildings to the pavement and violation of the open corner. There has already been a child fatality at the junction in recent years.

The proposed loading bay on Champion Hill (where the token increase in pavement width from 1.7m to 2m will barely make a difference) would pose an additional risk to pedestrians, especially to children. The Servicing and Emergency Access arrangements outlined in the 'Servicing & Waste Management Plan' are unsafe.

Refuse Collection

2.2 The refuse/recycling stores at the ground levels are located so that they can be serviced from the proposed servicing bay on Champion Hill.

The Post Planning Addendum states, in the context of the decision not to provide disabled parking on Champion Hill: "The Highways team advised that access to parking space from Champion Hill was not acceptable as it would require reversing from or onto the road, close to the busy junction with Dog Kennel Hill." The proposed servicing bay would be no safer or more acceptable. In fact it would be less acceptable, since the applicant proposes it be used daily by multiple drivers, for all manner of deliveries:

Other Servicing

2.4 Any other service vehicles (on-line super market, Amazon etc...) will also be able to use the proposed servicing bay, or park on the carriageway of Champion Hill. Servicing for the proposed development will similarly be undertaken from the proposed servicing bay, or on-street from Champion Hill or the adjacent private road.

The proposed bay would further attract parents dropping off children to Dog Kennel Hill School (it is tellingly labelled 'Drop Off Bay' in the servicing plan). Its insertion would endanger the many children who use Champion Hill as a walking route to school (encouraged to do so since the 2014 Kings College Hospital/Dog Kennel Hill School 'Breathe London' Study) and cyclists who use it as

Cycling Quietway 7.

In the context of the outstanding Highways safety issues, the absence of any documents to support either the original or amended application from LBS Highways Team (a statutory consultee) is unacceptable. The Plan is plainly at odds with Highways safety and with the Core Strategy's objectives to improve safety for road users and encourage people to walk or cycle in preference to driving. It seems also to have been conceived in complete ignorance of Champion Hill's status as a Cycling Quietway.

TfL commented on the original application(15/3/18): "Any permission should be granted to subject to conditions requiring a delivery and servicing plan (including waste collection) and a construction management including logistics plan which should inter alia manage impacts on the operation of the busy bus lane on Dog Kennel Hill site and on cyclists especially given the nearby cycle routes including Quietway 7." These conditions have clearly not been met as the proposed delivery and servicing plan is unsafe. Permission should therefore not be granted. I note that TfL have yet to comment on the amended application.

4. Poor Quality of Residential Accommodation.

a) Danger. According to the Design and Access Statement (6.12.3) "parts of Block A sit within the 'structure free zone', i.e. within 4.5m of the pavement edge", requiring the structure within the SFZ "be designed to withstand accidental impact loading arising from vehicles". It is not acceptable to house residents practically on the pavement in the SFZ on the notoriously dangerous A2216. It is contrary to Highways guidance and to Residential Design Standards. It was apparently agreed with LBS Highways that "the detailed structural design of the building will include impact loading as per BS EN 1991-1-7 requirements, and a BD2/12 compliant technical process will be completed with LBS Highways before commencing detailed design works of the building". There are no Related Documents

provided and nothing submitted in support of the amended application by LBS Highways.

A further risk to residents:

Emergency vehicles will not be able to access the southern side of Block A. The lack of any input on this and on the inadequate space between Block A and the consented development at 1A DKH (12m when it should be 21m) from either the Highways Team or the emergency services is unacceptable in light of the Grenfell Tower tragedy (emergency access was found to have been compromised by the excessive proximity of a recently built school near the foot of the tower, a danger of which Kensington & Chelsea Council had been warned).

2.5 Emergency vehicles will be able to access the majority of the Site's perimeter of the proposed blocks except for the southern side of Block A and will be able to park within 10 metres of the residential entrances, either on Champion Hill or the adjacent private road.

The amended application also fails to meet Secured by Design requirements (see 1. Non Compliance With Council Policy, New Southwark Plan P55) and has failed to respond to the concerns raised and requests made in the Met Police's statutory response (26/02/18) to the original application. The design team's failure to cooperate with the Met Police in the design process, as detailed in the Designing Out Crime Officer's recent response to the re-consultation (16/08/18) to ensure the Plan is safe for its residents and meets Secured by Design requirements should discount the amended Application from being accepted as safe.

- b) Noise.** Internal noise levels would be well above WHO recommended guidelines due to excessive proximity to the carriageway (unscreened by trees, which absorb noise). In fact, according to the noise report prepared for the Application, it is not expected that residents would be able to open their windows for ventilation at night. Wall hung ventilation units are being considered for the whole development.
- c) Cramped living quarters.** The bare minimum is

offered in terms of space standards.

- d) **Inadequate amenity space.** The dark, secluded, un-overlooked (so potentially unsafe) 12m communal outdoor so-called 'amenity space' shoehorned into the design along the southern boundary with 1A Dog Kennel Hill is unlikely to be enjoyed by residents, whom the architects have shockingly said would be "discouraged" from using it anyway. It is designated "visual amenity only" despite constituting almost half the scheme's amenity space and is not provided with seating, to avoid disturbing residents of the adjacent private development. The design alone is enough to discourage its use and constitutes a shameful waste of amenity space (which is moreover unlikely to meet Secured by Design standards).
- e) **Health.** Excessive proximity of Block A to the busy, 4-lane A2216/bus route would increase residents' exposure to levels of air pollution detrimental to health in an Air Quality Management Area, so designated due to existing poor air quality. The London Plan, Policy 7.14 (B) states: "Development proposals should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans" (see Policy 6.3). Removal of the existing green buffer zone on the corner to site a block on the pavement edge would contravene this policy and harm health.

5. Unacceptable Impact of the Plan on the Amenity of Surroundings and Nearby Occupiers, as a result of its failure to respond to the context of nearby housing (in direct contravention of both the London Plan and New Southwark Plan). The occupiers of nearby Appleshaw

House have, until now, enjoyed a good degree of amenity and this would be lost. Overshadowing and overlooking of this, the school, and other nearby properties, entailing loss of privacy and of light, is unacceptable and contrary to Southwark Residential Standards 2011.

6. Unacceptable Height, Scale and Massing of the proposed blocks on the crown of a hill where it would brutally alter the skyline, in the context of the predominantly low scale, open streetscape at the top of Champion Hill. The overbearing effect of the blocks is exacerbated by their proximity to the pavement. Surrounding properties are set well back from the street. Contravention of the Core Strategy and London Plan, Policy 7.7 Location and Design of Tall and Large Buildings, which defines tall buildings as any “which significantly alter the skyline” and specifies that “In areas which have a low scale character, any building that is significantly higher than surrounding buildings will be regarded as tall building even if lower than 30 metres”. The Core Strategy states that “in the wrong locations, tall buildings can be overbearing and out of character” and suggests zones within the Borough where they may be appropriate. The site is not in any of these.

7. The Loss of Mature and Semi-Mature Trees and Open Green Space, detrimental to physical and mental health and contrary to standards of local visual amenity. Contrary to the Council’s commitment to the provision of ‘breathing spaces’ in an urban environment and protection and enhancement of biodiversity (**Southwark Biodiversity Action Plan**), the **London Plan** (Policy 7.1, Biodiversity and Access to Nature, Policy 7.21 Trees and Woodlands.) and the **Core Strategy** (Strategic Policy 11: Open Spaces and Wildlife). Contrary to Southwark’s **Tree Management Strategy**, which states: “Trees are a valuable resource for communities living in dense areas such as Southwark. They are particularly valuable on housing estates as most council properties are flats without private gardens.” No CAVAT valuation has been provided for the trees that would be lost and the scheme

takes no account of the net measurable positive impacts of green infrastructure. To deprive residents of Seavington House and their neighbours on the Champion Hill Estate of the trees and green space they currently enjoy would be contrary to the Council's commitment to "to reduce health inequalities" by "embedding health and well-being into the planning and development process" (Peter John, Amendment to Strategic Management Arrangements, 24/7/18), as well as to the Mayor's draft London Environment Strategy and revised London Plan. The GLA's Research Report, 'Urban Greening Factor for London' (24/07/17), which will underpin future planning in London, states that : "FAILURE TO INCLUDE ADEQUATE URBAN GREENING COULD EXACERBATE THE INEQUALITIES between those already living in greener neighbourhoods and those living at higher density with less access to gardens or public green space." As this and other recent studies have shown, green spaces are "equigenic", i.e. equalizers of socioeconomic disparities in health.

The landmark trees on the corner enhance public health and amenity in a particularly polluted and prominent area, opposite a primary school. Their loss would be detrimental to the streetscape.

mark the boundary between Camberwell and East Dulwich and the approach to Camberwell Grove Conservation Area.

They "link" to the trees in front of the school opposite and other green spaces, form part of a network of biodiversity sites leading south to Dog Kennel Hill Wood and Green Dale, and westwards to Ruskin Park via Champion Hill.

They provide a vital green buffer in an Air Quality Management Zone. Their removal would be completely contrary to the London Plan, which recognises the vital role trees play (especially mature trees) in mitigating against climate change and improving air quality.

Their retention would show proper regard for the health and wellbeing of local children and of the future residents of Seavington House.

8. Failure to meet the needs of disabled or less mobile people, contrary to the London Plan, Saved Policy 4.3, and Southwark's Charter of Principles, which promises "homes built to Lifetime Homes standards and 10% built to be fully wheelchair accessible". No evidence provided of measures explored to overcome the difficulties relating to the site's topography, as alluded to in the Planning Statement and Post Planning Addendum (contrary to the Mayor's 'Best Practice Guidance' on wheelchair accessible housing). Whilst it is stated that the Design team explored the viability of wheelchair accessible provision with LBS Highways Team and an Occupational Therapist, there are no Associated Documents relating to this. The justification offered for the absence of disabled provision in the Post Planning Addendum is vague, confusing and inadequate, given that Lifetime Homes and Inclusive Design Principles are central tenets of Southwark's housing policy. The site benefits from excellent transport links (PTAL 4/5), as the applicant has stated, with wheelchair-accessible Denmark Hill station only 0.4 miles away and numerous bus stops at the top of the hill, very nearby. Yet the scheme appears to have been designed to exclude wheelchair access, rather than to facilitate it. The Planning Statement concedes that 4 of the proposed units should be wheelchair accessible and mentions a "policy compliant financial contribution" towards the adaptation of other homes in the borough. It is unclear where the contribution would be made, or how this would benefit the residents of Seavington House if they had the misfortune to become disabled.

9. Harmful impact on the setting of Camberwell Grove Conservation Area and listed buildings near the site on Champion Hill, & Grove Lane, contrary to Council policy and exacerbated by the proximity of the blocks to the pavement edge.

10. Absence of Safe Parking Provision in the Plan, likely to result in illegal parking near the junction, further endangering children.

11. Failure of the Plan to accord with its own Feasibility Study, which recommended the maximum capacity of the site as 30 units and maximum height as 15 metres. – amended application is for 35 units, up to 16.7m high. See Design and Access Statement, The Brief: Feasibility Study

The design process for this site initially began with a feasibility study prepared by Bell Philips Architects (January 2016) to test the viability of developing the site and to establish the number of units that might realistically be achieved.

The feasibility report presented a scheme of two blocks running parallel to Champion Hill, both set back from the street edge. The capacity of the development was 30 units across the scheme with a maximum height of 5 storeys (15m). One of the blocks was located close to the proposed residential scheme at 1A Dog Kennel Hill, which may have caused daylight issues. While the scheme managed to maintain the majority of the existing trees, a number of the trees would be affected by the proposed building footprints.

12. Insufficient gain (a net gain of only 25 homes since 10 existing would be destroyed) to justify the severe detrimental impacts of the Plan, as detailed in all the above comments.

In conclusion, I would very much like to see a new Plan submitted for one that is safer and greener (exploiting the green and open character of the site rather than destroying it), of appropriate size and quality. This should be in keeping with its surroundings, respectful of its neighbours and, most importantly, mindful of the safety of local children and residents.

The application is fundamentally flawed and unsound. None of the flaws is addressed by the single, minimal amendment submitted by the Council, despite their having been identified (along with their likely impacts) in the huge number of objections raised by local residents. The dangerous flaws inherent in the Plan have raised an objection and re-objection from the Camberwell Society. They have been expressed by Kathy Lowndes, Chair of the Friends of Dog Kennel Hill School, to Peter John, at our meeting of 18th April 2018. They have been set out in my correspondence with Amy Lester. They have been discussed at two recent, well attended site meetings between resident and Council representatives, arranged by Councillor Leo Pollak. They can no longer be ignored.

A whole new design is needed, in line with the findings now being established by Councillor Pollak, in close, very recent consultation with residents. The future residents of Seavington House deserve no less and the Council should start afresh with local support.

Yours sincerely,