



Amy Lester
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London Borough of Southwark
Strategic Applications
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24 August 2018

Dear Amy,

**SEAVINGTON HOUSE
PLANNING APPLICATION 18/AP/0532
DESIGN AND ACCESS STATEMENT DEFICIENCIES**

It is proposed that the new Seavington House occupies a prime hill top site, perhaps the last available in Southwark, and therefore warranting a remarkable structure of architectural importance.

The Design and Access Statement (DAS) for any application sets the scene for the application itself; if it is incorrect, then the whole basis for the application is false. It is therefore useful to check that the DSA follows the Supplementary planning document (SPD) instructions¹. As you know the DSA is a legal requirement and a material consideration in the determination of any planning application.

Context

The SPD requires that the DAS shows “how the design of the proposal has taken into account the nature of the surrounding area”². This it has not done; rather the inaccuracies included concerning building heights for example seem deliberately to confuse, with a lopsided and selective part of the surroundings selected for comparison.

“the scale of the new development should be in keeping with the surrounding buildings in terms of scale and building lines”. The surrounding buildings have been selected leaving out many, and

¹ Southwark Council Supplementary planning document *Design and access statements September 2007*

² SPD paragraph 1.3.

misstating the heights of others and including only those that suit the application. The maps put forward exclude contour lines and actual heights of buildings and therefore are unable to describe properly this desirable hill-top site.

As the Camberwell Society has pointed out "the two new blocks are overbearing in relation to their immediate neighbours, exacerbated by their immediate proximity to the pavement edges of Dog Kennel Hill and Champion Hill."³

The building line has not been respected at all; all houses in the vicinity are well set back from the road but the application proposes building right up to the pavement making it look like a city centre down market slum-to-be.

The scale is wrong, the building line is wrong and both are out of context.

While this sort of approach is expected from grubby greedy developers, we deserve better from our elected council.

Disabled access

The SPD requires that the DAS shows "how everyone, including disabled people, people with pushchairs and older people can use the building"⁴. But the building has been designed to **exclude** disabled people and makes it impossible for carers to visit, there being no parking facilities. This is a truly **antisocial** building.

Had the design of the building been in context, well set back from the road and had the pavement been widened, then space could have been found for disabled parking and for a safe flat entry/exit. To design the building so that it was not possible to cater for the disabled and then to declare it was unsuitable for the disabled is disgraceful.

Size

The SPD requires the applicant to "Explain the chosen amount [of residential units] is appropriate to the site and its surroundings". Having carried out a feasibility study on the matter the applicant then increased the capacity indicated by the feasibility study without any explanation.

Accessibility

The SPD requires the applicant to "Demonstrate that accessibility for all

³ Camberwell Quarterly No 197 Summer 2018 page 8.

⁴ SPD paragraphs 1.3

members of the community has been maximised"⁵. Far from this the applicant has deliberately designed out any possibility for access by disabled persons. The SPD requirement to "Demonstrate that the development is accessible by all of the community regardless of mobility or disability" is stressed again⁶, but to no avail. See also above.

Safety

The SPD requires that "Developments be designed to improve community safety and crime prevention" but the Metropolitan Police reported to yourself in a letter dated 26 February 2018 that "no Secured by Design application has been forthcoming to us."

There is no explanation as to "how the landscaping improves the safety and security of the development"⁷.

In fact the building will have to be strengthened as it sits in the "structure free zone" *ie* in a sufficiently dangerous position to warrant special extra protection against impact from vehicles *etc*. Safety could be improved by setting back the building line and widening the pavement to 2-3 metres to cope with the additional traffic contributed by occupants, as well as others, on the way to and from school.

Air quality

The only air quality consideration has been to make sure it will meet current standards. However, current standards have proved unsuccessful and Southwark policy plans to **improve** air quality. This application will not improve air quality as much greenery will be destroyed and any replacements will take many years to provide any protection.

Summary

The Design and Access statement is based on incorrect building dimensions and a specious selection of the surrounding buildings. No contour lines are included on any plans or maps and so it is not possible to appreciate from the drawings the hilly nature and therefore the context.

At the recent site meeting (Monday 20 August) the architect Philip Breese, of WestonWilliamson said that all the comments received had been addressed and indicated that he had no intention of correcting the Design

⁵ SPD paragraph 4.1.2

⁶ SPD paragraph 4.1.3

⁷ SPD paragraph 4.1.5

Access Statement. Most clearly the Design Access statement including the Post Planning Addendum presents a most distorted view and needs to be corrected.

The application does not explain the excessive size, the lack of reasonable safety, the lack of disabled access and does nothing to improve air quality.

There are so many inaccuracies and falsities in the Design Access statement, including the Post Planning Addendum that it is impossible for the Planning Committee to come to a fair judgement of the application.

I request therefore that Design Access statement, which is a "material consideration" be re-written before it is considered at any planning meeting.

Please also could you ensure that this letter is placed on the application website. Thank you.

Yours sincerely,

