**Sydenham Hill Ridge Neighbourhood Forum (SHRNF) Response to Lewisham SSD Consultation (SSDC) 07/06/20221**

**Introduction**

SHRNF is pleased to respond to the SSDC. A draft response was produced by a small group of volunteers. It was then circulated to the committee, registered members and our mailing list of some 300 names and discussed at an SHRNF online public meeting on 1st June 2021. Based upon input from these consultations our response was finalised and is presented below.

**Background**

The Government and local authorities have targets for new housing. In the case of Lewisham, the local Plan envisages about 23% coming from SSDs.

The Forum’s own Early Engagement Survey and our involvement in planning applications in our Neighbourhood Area identified key priorities for residents and other consulted parties in relation to new housing development as:

* Maintenance and enhancement of the green spaces and biodiversity of the area, including gardens and amenity land on housing estates
* Ensuring that developments respect and enhance the character and heritage of the Area.

This response to the SSDC Part 2 relates specifically to the Sydenham Hill Ridge Neighbourhood Area (SHRNA) and reflects these priorities.

New developments need to strike a balance between the need for new homes and maintaining the character of the Area, particularly as most of the Lewisham portion of our Neighbourhood Area lies either within the Sydenham Hill-Kirkdale Conservation Area or Sydenham Ridge Area of Special Character adopted several years ago.

**Key Objectives**

We support strongly thefirst key objective:

“Encourage applicants to build homes which are sustainable, resilient, healthy to live in and of exemplary design. Ensure they respond appropriately to the character and heritage of their neighbourhood.”

Our comments and suggestions aim to ensure that this objective is achieved.

Also, we agree with the “Learn from elsewhere” objective.

In this context we highlight The Dulwich Estate (TDE) Guidelines for New Build Properties. TDE is within Southwark but borders Lewisham. The SHRNA covers both and our neighbourhood plan will reflect The Dulwich Estate Design Guidance. We suggest that the SSDC should be consistent with guides of areas which are on the boundary with Lewisham. We comment further in the final section, TDE guidelines

**Wider Issues**

**Balancing housing provision and sustainability**

At the very beginning of its consultation document, Lewisham LA states its draft consultation addresses its “housing crisis and a climate emergency”. We support fully tackling both these grave matters but, in terms of small-site developments in general and on the Sydenham Hill Ridge Neighbourhood Area (SHRNA) in particular, Lewisham’s statement as it stands may be a contradiction in terms. SSDs may result in loss of green spaces, thereby both exacerbating climate change and negatively impacting the quality of life of those already housed in the SHRNA.

In this response we have endeavoured to ensure a better balance between these objectives.

**Amenity Land on housing estates**

This is not addressed explicitly in the SSDC. Our members who live on the estates are concerned that such land may be targeted for Small Site development, with significant loss of play and amenity space, which was important when the estates were first built, and which continue to play a part in the well-being of current tenants/owners. They are particularly concerned that some areas have been neglected by Lewisham and are therefore not able to be used as much as they once were; and that this will be used as a reason to remove green space and the wildlife corridors. We ask that the protections given to garden land should be applied to amenity land.

**Community Services (eg GP surgeries, schools)**

SDD often increases the number of people living on the site. While an individual development may have a small impact on the services, the cumulative effect is may be significant. Some GP surgeries are currently over-subscribed, for example Wells Park surgery is refusing additional local patients. Schools are likely to be impacted by nearby borough increases in housing density (200 new homes planned to be built on the Bromley border at Crystal Palace Park) even before there is any further suburban intensification by Lewisham. Residents request that the Council takes action to assess for itself whether the Community Services can support any further intensification, as our experience of developer assessments is that they are over-optimistic and often desk-top exercises undertaken without local knowledge.

**Housing need and provision**

Changing working practices may have significant impact on the future demand and provision with people moving out of London and office space becoming vacant. We request that the council sets in place the appropriate systems for monitoring such changes to ensure that opportunities provided by empty properties are utilised before approving development of nearby sites.

**Planning Policy Areas**

**Policy H2 Area (7.7.1/ page 16)**

We note that map Fig 6 (“map showing Policy H2 area”) shows a thin band of yellow along the southwestern edge of the Borough, in part of our Neighbourhood Area, which is deemed to lie inside the H2 Policy Area, while to the east lies a white band outside the H2 Policy area. However, Sydenham Hill Ridge is marked by steep gradients (its highest point is 370 feet above sea level), which impact adversely the connectivity. The narrow definition of Policy H2 Area based on distance from the nearest railway station fails to take account of topography. In our view it should be modified to take account of the reduced accessibility (especially for buggies and wheelchairs) in such areas and the increased need to use cars. The intention to develop is not supported by the PTAL map, where we are rated at between 0 and 2.

**Conservation Areas 8 page 20**

This section addresses designated Conservation Areas but does not mention Areas of Special Character and Areas of Special Local Character, which we consider need to be included in this guide.

We would like to see similar consideration for currently adopted Areas of Special Character and Areas of Special Local Character proposed in the draft Lewisham Plan, and their immediately bordering areas, as proposed for Conservation Areas in the draft Lewisham Plan.

For instance, Lewisham has published a “Lewisham Council Conservation Map”. We propose that, to assist developers, advisers and residents, the Conservation Map is extended to include both adopted Areas of Special Character and Areas of Special Local Character proposed in the draft Lewisham Plan.

In particular, we consider that the ambition in 8.1.2 for “…more stringent planning controls, such as restrictions on height, materials and building use…all trees that are visible from the public realm…are protected” in Conservation Areas should be extended to Areas of Special Character and proposed Areas of Special Local Character. all mature trees (particularly indigenous trees typical of the Great North Wood), whether visible from the public realm or not, to be protected.

**Concept Design (Steps 8 to 10 10.5.6 to 10.5.12/page 32)**

We agree that the concept design and consultation can reduce issues in the planning application. We suggest that to provide a better understanding of the design it should include:

* The footprint of the proposals for each of the following:
	+ The proposed new building and datum lines
	+ The parking areas for cars and cycles
	+ The driveways
	+ Distance from boundaries
* The footprint of the present buildings for each of the following:
	+ The current house
	+ The parking areas
	+ The driveways
* The impact on the green space.

We suggest that the consultation should invite written comments from all neighbours within a 400m radius of the property, irrespective of local authority (since our boundary is a meeting point for five boroughs). Additionally, we consider that the consultation should include Neighbourhood Forums and Amenity Societies. We agree that comments should be published accurately in the planning application and request that the application explains which neighbours’ comments have been accepted, which are being rejected and why.

**13 Design Principles (Section 13 p48-62)** **Height, Massing, Layout**

In the SHRNA we have seen development proposals for replacing a detached house with a number of townhouses or a block of flats. Such proposals can be out of character due to excessive height, reduction of garden green space, and biodiversity. Stronger guidance is needed to ensure that the design principle quoted above is realised. Our comments below reflect this.

13.2.2-5 Height (p48)

Height has been a key issue in objection to some PA’s in this Area. We support 13.2.2 that the height should respect the prevailing height. However, we consider that the guidance needs to be strengthened, to ensure this principle is achieved, in the way proposed in our response to 13.2.3 (p48) below.

13.2.3 (p48) We consider that the provision for a one storey increase needs to be more specific and that the height should respect the heights of the neighbouring properties if they are consistent, even though there is significant variation within the street.

This may well be the case on long streets, so, considering the street as a whole could bring significant change in character. It is not unusual for developers to compare their proposal with buildings some distance away to argue that it is consistent with the character of the area.

The guide does not refer to the tree line, nor does it refer to the Tall Buildings Policy (adopted). In some cases, the treeline is a more relevant comparison. We propose that in such cases Lewisham include a requirement that the building height must be below the tree line, as in the Tall Buildings Policy.

13.2.6-8 Massing (p48)

We consider that there should be guidance on the footprint (the building, garages, driveways), in particular that the footprint of a new development should be within that of the previous building or be consistent with the footprints of neighbouring properties.

We consider that the Design and Access Statement should explicitly provide details of the footprint, buildings, garages, parking and refuse areas and driveways of the current site and of the proposed development.

13.5.2 Family homes (p52)

We welcome this principle. Sydenham Hill Ridge has been developed in the past with family housing, both private (1960s) and social, with the Sydenham Hill Estate (1950s) publicised precisely for that. Unfortunately, more recent developments have provided much more limited, dense accommodation, with an associated increase in the numbers of cars parked by the adults in the accommodation. This is negatively impacting on the local character and community use and, is adversely changing the character of the Area.

13.8 Biodiversity (p55)

We welcome this principle. However, we consider that it should be strengthened by guidance on the footprint, as stated above (13.2.6), to guard against the erosion of garden space on sites which have larger gardens. We would also like to see increased protections for wildlife corridors. In recent years we have seen the apparent extinction of hedgehogs, dangerously low level of stag beetles and some species of small birds.

13.10.1-2 Heritage (p55)

We support the guidance for small sites to respond to the existing character of the area. We do not agree that heritage buildings should have close proximal development in an Area of Special Local Character, as outlined in the Lewisham Local Plan. There is a precedent for this with the refusal of the proposed Astra Palace development.

13.11.1-3 Environmental Sustainability (p55)

We are concerned that this SSDC fails to respond to the Lewisham Climate Emergency Declaration.

We consider that this guidance should be strengthened by requiring that:

* Heating systems do not use fossil fuels, in line with the Government’s planned restrictions.
* Rainwater capture and distribution is mandatory.
* Permeable driveways and car parking is mandatory.
* Potential impact on underground springs be assessed initially by the Local Authority and the developer required to minimise any impact on neighbouring properties and/or areas lying below the site.

In the case of the latter point we recognise that in this an area, due to the topography and nature of the clay, natural springs are common and are subject to weather conditions and probably more so with the increased weather variability due to climate change. However, problems can be exacerbated by building development which fails to take account of the situation. This should be addressed at the planning stage rather than left to building control.

13.12.1 -4 Car Parking (p56)

We consider thatfor SSDs which are more than 800 metres from a railway station and/or on a steep hill, if closer than 800 metres from a railway station, as referenced in Policy H2 above, then the parking provision should take into account the reduced accessibility.

Charging points for all on site car parking spaces in new developments should be mandatory.

Cycle storage (p56)

13.13.1-3 We support the requirement for secure covered bicycle parking. We consider that a charging point for electric cycles should be easily available, particularly in the case of cycle parking for flats.

**30 Side Street development (p144-147)**

Collective development in which there is substantial loss of garden space, as illustrated in fig 151, should be resisted.

**31 Vertical Intensification (p150-157)**

Where streets have a consistent height, and that consistency is key to the architecture and character of the street, then collective development as suggested in fig 164 should be opposed.

**34 New Mews and Alleys (p170-173)**

We object strongly to the proposals for development on garden land to form a mews, as illustrated in figs185, 186, as this provides for development on garden land by classifying it as a mews development.

**Loss of garden space**

35.2 Garden Land (p174-175)

We support the Local Plan that development of garden lands should be avoided

**The Dulwich Estate design guidelines for New Buildings**

We encourage the team to consider these guidelines, in particular regarding new developments in Conservation Areas, ASCs, and the proposed ASLCs:

* should not cause a loss of residential amenity to neighbouring residents. This means a loss of daylight or sunlight, a loss of privacy, or a loss of visual amenity. Balconies, Juliet balconies or roof terraces should only be permitted if there is no impact on neighbours’ amenity.
* should demonstrate an improvement to the streetscape such as increased planting, improved materials or creating a more “open” character due to lowered fences and walls.
* should have a minimum of 50% soft planting to the front garden area.
* parking should not dominate property frontages.
* rear-garden space should be proportionate to the size of the development.
* boundary treatments should match the predominant original style in the street or the group.
* refuse storage should not negatively impact the streetscape or the neighbouring properties and should therefore be well screened.
* solar panels and green roofs are encouraged.
* heating, ventilating or mechanical plant housed in enclosures in front or rear gardens must not impact on visual amenity and should be housed within suitable acoustic enclosures.