 Laurie Bell

 Chairman,

 1, Mottingham Road,

 London, SE9 4QQ.

Planning Officer,

London Borough of Bromley, Chair@yourmra.org

Via email. 26th June, 2019.

Dear Planning Officer,

**Re: Application No. 19/01670/FULL1.**

**Proposal to demolish the existing public house and erect an A1 retail foodstore with associated works at 24, Mottingham Road, London, SE9 4QW.**

On behalf of local residents, the Mottingham Residents’ Association (MRA) strongly objects to this proposal on the grounds that Lidl have failed to make a case for the replacement of the public house by a Lidl Foodstore. The MRA cites the following grounds:

* Transport and Safety of all road users,
* Accessibility,
* Servicing arrangements,
* Parking,
* Vitality and community wellbeing - the need for a night time economy,
* Environmental issues,
* Loss of amenity to residents.

**SCP Report - Transport Assessment, Parts 1-3**

The Report fails to make a case for a Lidl Store on a range, of important counts:

Part 1, of the Report, at para. 2.8 states that the Manual for Streets, MfS & MfS2 “emphasise the importance of meeting the needs of all users, such as pedestrians, cyclists and public transport users”.

* The proposal to reduce the width of the road outside Mottingham Library, the main focus of the village, is detrimental to the needs of all users. Numerous groups using the library include, three baby & toddler groups, under ’5s’ and children’s story times, reading clubs for school pupils and teenagers including a summer holiday reading scheme, Lego Club, regular visits from two schools and three nurseries, three adult reading groups, (mainly elderly residents), coffee mornings and Friday evening speakers. Groups congregate before and after sessions on the forecourt. School groups consist of either one or two classes, (30 or 60 pupil)s. This is in addition to individual visitors for reading, use of computers, personal tutoring and advice.
* The existing raised flower bed, sculpture and bench outside the library are not shown on Lidl’s plans. As a result, the pavement is narrower than it is shown on the plan. Whilst the minimum requirement for pavement width is two metres, MfS, para. 6.3.22 insists that the pavement outside shops and community facilities should be wider to facilitate circulation and safety, particularly where the carriageway is heavily used. It must be noted that Lidl HGVs will occupy the full width of the carriageway. Given that the majority of library users, who visit as groups are the most vulnerable in society, children, parents with buggies & toddlers & the elderly and disabled, absolutely no reduction in width outside the library can be deemed reasonable. MfS para 6.2.3 says “Streets where people walk in groups, or near schools or shops, ….. need wider footways. In areas of high pedestrian flow, the quality of the walking experience can deteriorate unless sufficient width is provided.” The MfS, p.68 indicates that two people, side by side, one pushing a buggy require a 1.5metre width, a mobility scooter requires 0.9 metres. For one to pass the other, requires a minimum of 2.7 metres width to allow for a safe distance from the kerb. The library is an area where many buggy and mobility scooter/wheelchair users congregate.

Mottingham Library showing the large raised flower bed, sculpture and seat in front.

* The alteration of the carriageway to form even a small curve will prove dangerous to pedestrians, as well as traffic. Traffic exiting the roundabout, into the village is currently faced with a reduction in carriageway width, with visibility for traffic turning left from West Park very poor.



Left turn from West Park showing poor visibility of traffic ahead in Mottingham Road.

* To be faced with a curve, pointing towards the assembly point for the library, increases the likelihood of a misjudgement, particularly if a driver is distracted by queuing traffic, entering or exiting the proposed store.
* The refuge in the centre of Mottingham Road, outside the proposed pedestrian entrance, is barely adequate for the numbers using it, as it is. The refuge can accommodate one parent, buggy and walking child at a time, or a single wheelchair.
* Given that it will become the only reasonable access for pedestrians, to the proposed store, it will be totally inadequate. Use of the zebra crossing in order to gain access to the proposed store across the widened vehicular entrance, opposite will be equally dangerous.



Depth and width of refuge is too small to accommodate multiple shoppers crossing to the entrance to the proposed store.

* The siting of the entrance and trolley store, to the proposed store, will increase the massing of shoppers and passers-by on the narrow pavement, increasing the risk of accidents to them. The proposal will also be visually intrusive and cluttered at the entrance to the village, contrary to Local Plan Policy 102. More important is the distraction of motorists approaching and leaving the Memorial roundabout. Bromley’s Local Plan. Paras 2.15 seeks to improve the pedestrian environment in order to reduce vulnerability to all road users. Para 2.19 insists that “Road safety considerations should influence the design of any development, particularly when a proposal may have effects upon any road user.” The proposed reduction in footway widths, on the library side, and proximity of the store entrance, to the footpath, clearly contravene these Policies.

**Accessibility**

SCP’s assertion at para. 4.2, Fig, 4.1. Pedestrian Accessibility, that 2km is a reasonable distance to **walk** to a Lidl store is disingenuous. The area is well served with a wide range of both neighbourhood and large stores, all entirely suitable for top up shopping. The idea that anyone would be willing to walk such a distance, for a substantial shopping trip, is fanciful.

At para. 4.5, fig 4.2, Cycle Accessibility, the width of the road along the length of the shopping street, effectively precludes cycling in all but the quietest times. Parked cars, and deliveries to shops, effectively reduce the road to a single lane. A bend and built out visibility splay will add to the hazards faced by cyclists. A Lidl HGV, behind a cyclist would be obliged to follow it the full length of the village.

At para 4.9, fig. 4.4, Public Transport Accessibility. A PTAL rating of 2 is officially classed as ‘poor’ in terms of accessibility. The single bus stop, (ML) serves a limited range of places towards the south and west. Chislehurst and Lewisham are very well served by supermarkets, including a Lidl in Lewisham. Towards the east, every bus, 124, 126 and 161, serves Eltham which also hosts a Lidl store. Chislehurst hosts a wider range of shops than Mottingham. Both Eltham and Lewisham are full service shopping centres. It is difficult to understand why shoppers would alight in Mottingham when 2 stops would take them to Chislehurst, or 4 stops to Eltham at no extra cost.

At para. 7.18, fig. 7.8 Households without a Car or Van across Wards in the Catchment Area. The plan indicates a skewed catchment area, away from Lidl Eltham. It covers an area which as no access to Mottingham by bus. Car is the only reasonable mode of travel. Despite assertions to the contrary, by Lidl, it indicates a scant regard for reductions in emissions. Travelling to other Lidl Stores, via more easily accessible main roads, and which may be better served by public transport, would be more convenient and less wasteful of resources. Bromley’s Local Plan, Transport Policy states at 2.11, point 3 that major developments should be located “where they can maximise the use of public transport.” This is clearly not the case in Mottingham with a PTAL rating of 2.

Despite the SCP Report emphasising the use of public transport, para 6.8, fig 6.2 acknowledges that car use, by customers will be make up 65%, walking, 25% and all other modes of transport together, 10%. No consideration, safety, accessibility or parking is given to the needs of motorcycle users.

 **Servicing**

At 6.12 i) It is acknowledged that a 5/6 axle HGV would need the full width of the carriageway to enter and exit the site. This would be an extremely onerous, novel and unwelcome development. The arrangements for delivery to the Porcupine, as a public house, were based upon a one way system in which all traffic entered the site opposite the library. Angled car parking, for customers’ vehicles, was situated to the front of the site and delivery drays pulled up in front of the Porcupine. All vehicles left the site at the entrance nearest the roundabout and were obliged to turn left. Para 6.8 asserts that a single entrance “represents an improvement to road safety”. The lack of accidents close to the exit nearest the roundabout refutes that assertion.

At 6.12 ii) MfS, in giving dispensation to infrequent use by very large vehicles such as pantechnicons or lorry mounted cranes, does not include regular delivery vehicles. Lidl makes exclusive use of 5/6 axle articulated HGVs for its deliveries. Observations, at the Lidl’s RDC in Belvedere site, confirm that the only vehicles, other than 5/6 axle HGVs, available for deliveries are one refrigerated box van and a couple of transit vans, for use in emergency. It is the case that Mottingham Road rarely sees HGVs of the size used by Lidl. Other, local, supermarkets are situated on more accessible sites, well planned to accommodate them. The Co-op at Kimmeridge Road uses more appropriately sized vehicles. Through traffic uses the dual carriageways of the A20, Sidcup Bypass and A205, South Circular routes.



A 6 axle HGV having turned right, across the dual carriageway following delivery to Lidl, Bellingham Store.

At 6.12,iii) it is suggested that deliveries will “typically” take place between 6-7am and 10-11pm. These times are unacceptable in a residential area, in particular to the rear of the store which has a unit housing very vulnerable adults. However, these suggested times are not binding and do not occur in the case of small stores in any case. Informal interviews with senior Lidl staff at a number of existing stores, across the area served by the Lidl, Belvedere RDC, yielded the information that only larger stores receive regular, timed deliveries. Smaller stores, of which Mottingham would be one, receive deliveries on a rotating two week cycle over which the store has no control. They can be at any time during store opening times, including rush hours.

At 6.13, it is suggested that HGVs would turn right out of the store. The proposed exit lane splay would tend to indicate a left turn, but in that case, the lorry would need to use the protective hatching near the pedestrian refuge. A right turn would point the lorry straight at the Library. In either case, using the full width of the road would cause congestion on both the roundabout and along Mottingham Road. There is also the issue of severe damage to infrastructure caused by oversized HGVs using unsuitable roads. Alterations to street lighting, drains, electricity, gas & telecoms would need to be made if the width of the pavement outside the library was reduced. An underground tributary to the River Quaggy runs along the south eastern side of Mottingham Road. The pipe is close to the surface and was replaced at considerable cost in the recent past. The narrowness of the road and excessive width of such large HGVs means that they must follow the exactly the same path along Mottingham Road. It would soon result in severe damage to the surface and underlying infrastructure. As an example, in the case of an HGV carrying 6 tons per axle and another carrying 3 tons per axle, the heavier vehicle does not cause twice as much damage, but 2x2x2x2=16 times the damage caused by the lighter one.

At Transport 2, SCP Appendix 6, Swept Path Analyses,

* Fig 1, HGV approaching from the Memorial Roundabout. The HGV is seen to encroach on the protective hatching, exactly where pedestrians will be crossing, at the pedestrian refuge on the pavement outside Physio-active, close to the crossing refuge. It will be difficult to avoid encroaching on the exit lane, a particular hazard for traffic turning right. There is absolutely no protection provided for the pedestrians walking from parking spaces 29 to 33 within the site.
* At Fig 2, HGV leaving the proposed site towards the Memorial Roundabout. The HGV is seen to be encroaching on the protective hatching of the refuge, close to the crossing point and the pavement outside the proposed store. It will encroach on the entry lane at the proposed entrance. The plan provides for a walkway in front of parking spaces 17 to28. However, it is truncated outside numbers 27 & 28 due to the projected trajectory of the HGV, at exactly the point at which the most vulnerable users, the disabled and parents/children need the most protection. On leaving the site, SCP’s Report para 6.3 states that, with a modified kerb line, the HGV could achieve a 2.4 X 40m sight line, measured along the kerb. MfS insists on a minimum of 43metres, as did L. B. Bromley in Lidl’s 2014 application. The difference could cost a child its life. No mention is made of sightlines for motorbikes.
* At Fig 3, HGV leaving the proposed site and turning right. The HGV will encroach on the entry side of the entrance and the oncoming lane of Mottingham Road until it reaches no. 30 Mottingham Road. Thereafter, the HGV completely fills the carriageway travelling south east. No arrangements are suggested for HGVs turning left into, or right out of Court Road at the other end of the village.
* At Fig 4, HGVs approaching the proposed site from the south east will encroach onto the central markings on the road and cross onto the exit side of the car park.
* At Figs 5/6 HGVs approaching the loading bay will clip the edge of the pedestrian route on bays 16 & 17 then drive over it before positioning to back into the loading bay.

Swept path analysis within the proposed car park clearly shows the lack of any allowance for driver error. The HGVs are clearly far too large for the space allocated. They will require both sides of the aisle in the car park. Should there be a customer vehicle of above average size approaching, the HGV will be dangerously close to the pedestrian route, crossing it, and probably clipping it, adjacent to parking bay 16. Parking spaces 1 to 16 have no protection from driver error during manoeuvres. Many HGVs post a sign on the back of their vehicle stating:

 **“If you cannot see my mirrors, I cannot see you.”**

The danger to vulnerable groups is obvious. No local supermarket, apart from Lidl, involves such a dangerous means for servicing the store. Where deliveries involve an HGV using the customer car park, no manoeuvring takes place. Delivery vehicles pass in a straight line, facing forward, through the car park. Others separate customer car parking from deliveries entirely. See table below. Even Lidl acknowledges that mixing HGVs with customer parking is dangerous. The configuration for deliveries, at the Eltham Lidl, is similar to the proposal for the Mottingham Store. Deliveries are made outside opening hours. This is not possible in Mottingham as it is a residential area.

SCP Appendices 7 & 8, Safety Issues. SCP seem to concur with the above comments which are in direct conflict with Bromley Local Plan Policy 32, Road Safety and Policy 33, a & b, Access for All. No attempt whatsoever has been made to address safety. Promises to address them later in the process are totally unacceptable. Failure to mitigate them will leave road users, particularly, pedestrians, exposed to danger. **The MRA requests that consideration is only given to this application once transport safety issues have been fully addressed.**

**Local Supermarket Delivery Arrangements.**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Supermarket | Size where known | Parking Spaces | Location of deliveries | Size of delivery vehicle |
| Co-op Kimmeridge | 6800 s.metres | 57 | Enter & exit in straight line within wide aisle carpark. No manoeuvring |  2X axle box lorries, small vans |
| Co-op Downham | v. large | 100+ | Cross wide aisle carpark to kerbed off area, manoeuvre & exit facing forward | Up to 5/6 axle HGVs |
| Sainsburys Chislehurst | Large | 104 | Cross wide aisle carpark to staff only parking area, manoeuvre & exit facing forward.  | Up to 5/6 axle HGVs  |
| SainsburysLee Green | V. large | Ground floor parent/child & disabled only.Underground 100++ | Entirely separate from customer parking | Up to 5/6 axle HGVs |
| Sainsbury’s Eltham | Large | Public carpark adjacent | Complete separation from customer parking | Up to 5/6 axle HGVs |

**Parking**

A PTAL score of only 2 (poor), would indicate a need for between 35 and 52 spaces. The carpark is cramped and remains inadequate for the numbers who would use the proposed store, particularly at peak times. No account has been taken of the dearth of parking available within a reasonable distance of the proposed store. The methodology chosen is flawed. Shoppers will not choose to travel to a supermarket, by car, to accept a 10 minute round trip to and from the car. (12.5 minutes at average walking speed of 80m per minute.) Shoppers prefer to queue. This is vividly demonstrated by several hour’s observations at the rear of the Eltham Lidl store. There is a pay & display carpark opposite Lidl’s carpark and a Marks & Spencer one next door. On six occasions, during a one hour observation at their peak afternoon time, a queue of up to 5 vehicles formed in the street. On only one occasion did a shopper, having joined the queue, then use the pay & display carpark. It cannot be assumed that demand for parking spaces is evenly spread across each hour. Localised peaks in demand will have a significant effect on traffic in Mottingham Road as there is no buffer service road to absorb the queue.

The use, by customers, of quite large vans, people carriers & small PSVs cause considerable congestion when manoeuvring as the spaces and width of aisles are too small to accommodate them easily. Queues on the road have been observed as commonplace outside Lidl Store sites and not only at peak times. Customers queue in the mouth of the entrance, unless there is a visible space available, in order to block others from claiming the first available space. The queue, inside the car park, blocks cars attempting to exit parking spaces. Where a larger vehicle is involved, greater space is needed.

Whilst a 500 metre walking distance is typically used for a “commercial development”, this implies a development involving multiple outlets, not the single store proposed by Lidl. The more widely used calculation, of parking availability, is the London Borough of Lambeth method involving a 200 metre radius and a 2.5 minute walk at average walking speed of 80 metres per minute. This is generally accepted by Bromley as reasonable. It paints a very different picture of parking stress. It has to be noted that the majority of streets, close to the proposed Lidl site, are Victorian terraced homes which have no off-street parking for residents.

At 200 metres from the store, there is, effectively, no parking available in local streets at peak times, due to yellow lining at junctions, school markings and restrictions imposed by L.B. Royal Greenwich to discourage parking for Mottingham Station. The only local street parking freely available at a distance of 200 metres is the northern end of Court Farm Road. It is fully occupied during term time by Eltham College sixth formers.

**Parking Space Count at approximately 200 metres from the proposed Store at Peak Times**

|  |  |  |
| --- | --- | --- |
| **Street** | **No of Parking Spaces within 200m of Prop. Store** | **Reason for Restrictions** |
| Devonshire Road | 6, generally used all day by employees of shops | Forecourt parking by residents |
| Dorset Road | 0 | Yellow lining, school markings &Funeral Dir. |
| Court Farm Road | 0 during school hours | 6th Formers, Eltham Coll. |
| College View | 0 | Residents’ Drives |
| Highcombe Close | 0 | Yellow lining |
| West Park | 0 | L.B. Royal Greenwich Station parking restrictions |
| Mottingham Road shopping Parade & approach | 15 2 | 30 minutes, no return…. |



View of north end of Court Farm Road indicating parking stress caused by Eltham College sixth formers

The only, easily available off-site parking is on the shopping parade, opposite the proposed Store. Parking is limited to 30 minutes to facilitate pass by, top up, takeaway and emergency necessities such as medical prescriptions. The spaces are heavily used and parking durations are short. There are no more than 3 spaces empty at any time during normal shop opening hours and they are generally filled within 5 minutes. Local shops rely upon this business to survive.

Existing Lidl Stores give an indication of expected length of shopping visits on their websites. The average stay, at peak times, is between 30 & 40 minutes. There is no doubt that Lidl shoppers, not needing a trolley, would actively choose a space on the Parade rather than queue in the street and fight their way into the car park in the hope of finding a space. Local businesses on the Parade will be wiped out, to the detriment of local residents and the future vitality of the village. This is precisely the case in Foots Cray, an area with residential properties surrounding the village and there is very little on-street parking. Prior to the arrival of Lidl, Foots Cray village centre enjoyed a range of shops, including small supermarkets and corner shops. Visits to these shops supported others, including cafes. The centre has effectively been wiped out by the arrival of Lidl. It now hosts only one, very run down, post office/paper/sweet shop which also sells sandwiches. The casual footfall has gone. There are numerous empty shop fronts, a couple of takeaways and internet based outlets such as double glazing which are only open infrequently, by appointment.

The use of ANPR together with the pressure on Lidl car parks undoubtedly discourages shopping outside the Store. Despite the length of time allowed, shoppers fear that browsing elsewhere, visiting a café or meeting a friend, will result in a fine.

SCP’s Car Management Plan claims, at 3.0 Operator’s Obligations, that at peak times, Christmas, Easter and New Year, Marshalls will be employed to “prevent people from blocking aisles whilst waiting for a space ………. and ensure that vehicles do not queue out of the site access, back onto the local highway network.” Both issues arise, on a daily basis and throughout the year, at Lidl stores local to Mottingham. Where Lidl carparks are accessed form service roads, dual carriageways or wide, single lane roads, there is little effect on other road users. In Mottingham, with a narrow, busy, single lane, village centre road being the only access to the proposed store, queuing will quickly lead to gridlock on the Memorial Roundabout.

**The Porcupine site is too small to accommodate a store of this size together with parking and safe servicing. The proposal represents a gross overdevelopment, putting profit before both safety and the interests of residents.**

**SCP Travel Plan**

At para. 1.7, SCP states that the Travel Plan emphasises the travel of staff members rather than shoppers, acknowledging the difficulty of influencing members of the public. Given that the number of staff on duty at any one time is stated as 6 or 7, it is likely that a maximum of **14** staff members will arrive and leave each day. Given the commitment in the Transport Assessment at para. 7.1, to recruit locally, most staff should be able to walk to the store. The suggestion of the use of ‘Incentives’, in Section 8, to encourage customers, and, particularly, staff, to travel by means other than car, bear little relation to the practicalities of shift and split shift working or the needs of families.

The average shopper at peak times spends 30-40 minutes in store, (information freely available on each Lidl store website), a 33 place car park, two thirds full on average, and open 14 hours per day, would entail: 840 minutes X 22 av. car park spaces in use, divided by 35 minutes, a total of **528** car bound shoppers per day. 1056 movements in/out of the carpark.

The SCP Travel Plan, by concentrating only on staff and suggesting mitigating incentives which are irrelevant to the circumstances at the proposed store, invalidates the Plan.

**Vitality and Community Wellbeing.**

The Mottingham Community has been well served by the support of CAMRA and the Porcupine Development Committee in its efforts to ensure a future for the Porcupine Public House. The MRA supports but does not intend to replicate their submissions.

Policy 23 of the Bromley Local Plan exists to ensure that communities enjoy a healthy environment and a sound future. The L.B. Bromley Officer’s submission to the original Lidl application measured the distance to the nearest public house, the Prince of Wales Feathers, as greater than 500 metres.

When Lidl closed the Porcupine at Easter, 2013, they cut off all access, for local people, to a freely available meeting place after 4.30pm on weekdays and at any time at weekends. The community was left with two cafes, a work-mans’ style establishment and an eat-in sandwich/light lunch café. The closure caused degree of fragmentation of the community. After Christmas, 2018, a small café opened in the village, offering a comfortable venue with good quality products. It succeeded immediately and has gone from strength to strength. It opens at the weekends but not during the evening. The community is already adequately served with food stores and supermarkets. The village has no night time economy whatsoever. Bromley’s Retail, Office, Industry & Leisure Study, March, 2012 Para 2.2.1/2 insists that suggested figures, for the expansion of supermarket shopping, are maxima rather than targets which must be achieved, and that a review should be undertaken when proposals for a new store appears. The studyis quickly becoming outdated as shoppers develop a preference for shopping more often. This has led to the trendaway from large supermarkets, towards small, local outlets. Two neighbourhood Co-ops have opened recently in the vicinity. Another is under construction at Mottingham Station.

**Mottingham needs a night-time economy in order to thrive and to retain a future as a Community.**

**Environmental Issues and Arboricultural Impact**

The proposed development is largely unchanged from the 2013 application in environmental terms. The visual impact will be intrusive as the Plan shows that it will be forward of, and out of line with, the building line of War’rs on the approach to the Memorial roundabout. It will give the appearance of crowding the War Memorial, a Listed Building. Both other commercial buildings, Warr’s and BP, whilst varying in style, are set well back from the Memorial itself with forecourts which are open and spacious. The front of the proposed store meets the pavement at the corner nearest the roundabout, further increasing the sense of enclosure and dominating the street scene. The entrance and trolley store, close to the crossing point on the roundabout, creating further pressure on the narrow pavement. In contrast, the Porcupine Public House is set back from the road, in line with the Warr’s building. The two side extensions are set further back still, in order to enhance the feeling of space. The issue of advertisements, hoardings and signs has not been addressed in the application. Local Plan Policy 102 stresses the need to avoid “visual intrusion and clutter” and states that they should not be located in residential areas.

Mottingham Village is relatively built up at the Memorial Roundabout. The Warr’s Motorcycles’ site is completely built up and the BP garage contributes little. The homes above the shopping parade have neither front nor rear gardens.

The MRA strongly challenges the assertions that Trees T1 &T2 are of little value on the site. The imminent death of Tree T1 was predicted during Lidl’s Planning Appeal in 2014. Both trees have grown and are thriving. They remain protected by Tree Preservation Orders. It is also important to consider the contribution they make to the site as a whole. The Porcupine, as a public house, enjoyed a generous sized garden, most laid to lawn, shrubs and flower beds and with shrubs and trees around the boundaries of the entire plot. The garden made a major contribution to the greening of the centre of Mottingham Village and to the wildlife corridor comprised of back gardens. The heavy planting comprising trees and shrubs provided an acoustic barrier to the homes in Devonshire Road and Court Farm Road. A whole row of mature fir trees, at the rear, was felled, by Lidl, on acquiring the site.

Since 2013, the site has been abandoned to nature, which has largely taken over. As can be seen in the photograph, the whole garden is overgrown with a far wider range of plants than existed before. The front contains a number of tree saplings. Together the site makes a far more valuable contribution to improving the environment than ever before. Whilst it is accepted that this is a village centre location, the opportunity to maintain the integrity of the environmental contribution should not be lost. The sterile and stylised mono-culture proposed in Lidl’s application is total inadequate.

 **The reinstatement of a public house on the site would offer the opportunity to maintain both the spacious and attractive village entrance with the newly refurbished War Memorial as its focus and a sufficient and varied planting.**

Photograph of part of the rear garden of the Porcupine, June, 2019, showing extent of the growth.

Porcupine building to the left. Protected Oak Tree, T2, in foreground.

**The Porcupine Site should continue to contribute positively to the environmental health of the village.**

**Loss of Amenity to Local Residents.**

Residents of homes surrounding the proposed store would suffer a severe loss of amenity due to this proposed development, particularly those living in Devonshire Road. Lidl’s Noise Assessment concludes that overall noise levels from all sources would be within acceptable limits and that acoustic fencing would contain the sound. However, it must be pointed out that rear gardens, in Devonshire Road are less than 10 metres long. Unattractive boarding would further detract from their enjoyment of their home and garden. Advertisement, hoardings and signs, part visible above acoustic boarding, and fully visible from upstairs windows, would further detract from residential amenity.

Much of the noise generated from the proposed Lidl store, would not be constant, but consist of frequent, short, loud sounds such as car doors slamming, trolleys crashing and shoppers shouting. These sounds are not easily controlled.

26 Devonshire Road houses severely disabled adults, suffering from Autism. The condition causes high levels of distress in sufferers when exposed both to loud, sharp sounds and continuous monotones. One resident has a bedroom overlooking the proposed store. Residents would need high levels of support, not only during demolition and rebuilding, but thereafter, on an on-going basis, due to car park activity and HGVs unloading so close to their accommodation.

No assessment has been offered on the generation of pollution from vehicles on the approach to the proposed store, or within the car park, caused by constant low gear waiting and manoeuvring. Diesel HGVs are particularly polluting. At Lidl’s estimated parking length of stay, of 30-40 minutes, up to 60 vehicles per hour would be entering and leaving the site. Homes backing onto the site would be most adversely affected, as would the shopping parade.

**The Mottingham Residents’ Association asks that this application for a Lidl Supermarket, be refused on the basis that it is an entirely unsuitable development.**

Thank you,

Yours sincerely,

Laurie Bell,

Chairman,

Mottingham Residents’ Association.