

Additional Comments to London Borough of Lewisham on Reserved Matters Application DC/18/107698 Convoys Wharf, Block 08 (Phase 1) and its surrounding environment

Voice 4 Deptford makes these Additional Comments (05/09/2018) on specific documents in response to the resubmission of the Application of the above by Convoys Properties Limited at the request of the L B Lewisham. We are aware of the content of the comments to be submitted by Deptford Neighbourhood Action (DNA) and support them as complimentary to our own.

Document 1)

Entitled 'Statement of Community Involvement' this document was added to the submission on 8 August, 2018. Produced for CPL by Quatro Public Relations and, when written, called "Statement of Community Consultation" Reference no. CW22 February 2018. It is the view of **Voice 4 Deptford** that Quatro's interpretation of the public's comments about Phase 1, Block 08 can be inventive to the point of error. For example:

P 18. 7. Conclusion and Next Steps

7.2 Quatro says:

'Broadly the feedback received indicated that residents were positive about the proposals and keen to see how the scheme could contribute to the local community and environment'.

Voice 4 Deptford Comments: Reading the forms, many of the comments about the scheme say that it should reflect the history of the area as a ship building yard and wharf in its design, that the design is bland and boring, too high and could be anywhere and it didn't contribute to the local community and environment.

7.4 Quatro says:

'There was concern about the level of affordable housing overall. While this was taken into consideration in the feedback, it should be noted that the level of affordable homes was agreed as part of the outline planning agreement signed in 2015 and is not subject to deliberation during a reserved matters application.'

Voice 4 Deptford Comments: The level of affordable housing is not fixed. It was agreed as a minimum of 15% and is subject to a review mechanism at the first application for reserved matters at each phase. See Schedule 5 of the Section 106 agreement. Many also mentioned the complete lack of social rented housing, in the scheme, when there is a homelessness crisis, right now, in LB Lewisham.

7.6 Quatro says:

'There was particular enthusiasm behind the idea of augmented green space and a revitalised public realm. As part of the feedback HWP will continue to work with the London Borough of Lewisham on the development of a cultural strategy and wider plans for how the public realm can,' [Sic - end of sentence]

Voice 4 Deptford Comments: People complained about the lack of green space and respect for the heritage of the site and the area. So far the requirement of a Cultural

Strategy Group to consider these matters has not materialised and Condition 42 has not been met.

P. 18 4. Consultation Strategy and Activities

4.1 Quatro says:

Commencing in June 2017, Convoys Property Ltd began a comprehensive public consultation process on the development proposals for Plot 08 Convoys Wharf, ahead of the submission of a planning application in December 2017.

Voice 4 Deptford Comments: the focus of the Statement of Community Engagement is on the very small window of 2 to 4 weeks of consultation with the public in 2017. There has been no continuous and wide ranging public consultation, as befitting a scheme of this magnitude. In comparison, the nearby and equivalent large scale redevelopment of Canada Water has seen a consultation that has undertaken over 100,000 hours, holding regular open public meetings, workshops and continuous mail outs of information.

To Summarise V4D's Comments on the Statement of Community Involvement: Quatro Public Relations has chosen to interpret the public's opinions of Plot 08 in a way which suits the needs of their client Convoys Properties Limited. Voice 4 Deptford, with a brief to represent the people of Deptford, sees different, more critical, points of view in the same material. The public was not universally 'positive' and 'keen to see how the scheme could contribute to the local community and environment'. Many of them voice the same criticisms that V4D has of Plot 08, that it is an 'anywhere' design, has only one type of housing available in it and lacks appropriate green space. The level of community involvement has been inadequate.

Document 2)

Entitled 'Planning Statement' was added to the submission on 8 August, 2018. Produced for CPL by DP9 Ltd, planning consultants, and called Convoys Wharf Plot 08 Planning Statement (CW02), Rev01 - August 2018.

Voice 4 Deptford Comments that this statement has been considerably revised since the original Phase 1, Block 08 Reserved Matters Application of June 2018. There are many omissions, errors or half-truths contained in it. For example:

P12 Figure 3: The plan shown for the phasing of the development has been superseded by Ref. No: DC/18/107740 Validated: Thu 21 Jun 2018.

Voice 4 Deptford Comments: Despite the L B Lewisham's request for a resubmission of this Reserved Matters Application because, it said, the submission was not up to the standard to be expected from a development of this scale and nature, in this instance there remains two plans for phasing. Which is the public to believe?

P15 4.4 The Planning Statement says: *'The ambition for Plot 08 is to successfully establish Convoys Wharf, linking to the existing Deptford High Street...'*

Voice 4 Deptford Comments that the position of the block in Plot 8 does not lead directly to the river as a continuation of Deptford High Street.

P26 8.3 The Planning Statement omits to say there is 14% of the flats which are single aspect, that is, they have a window in one wall only.

Voice 4 Deptford Comments that the recommendation for a 'cool' building is for windows on at least 2 walls to have a through flow of air.

P25 7.5 The Planning Statement quotes the London Plan's aim:

To support high density development relative to accessibility and public transport capacity (Policy 6.1).

Voice 4 Deptford Comments that the PTAL is low at 2 and is unlikely to rise to meet that required for a development of this size given the proposals so far.

P27 Assessment of Reserved Matters, Residential Mix. 8.6 of the Planning Statement says states that Plot 08 provides a variety of typologies.

Voice 4 Deptford Comments this is not true. Plot 08 has only 1- and 2-bedroom private flats. Accommodation of 3-bedrooms or more should be provided in Plot 08 in keeping with the aims of CPL in their Sustainability Statement to meet the needs of local people for larger family units.

8.9 The Planning Statement says: *"The wider development will deliver new affordable housing as required by planning policy and the OPP. The amount of affordable housing to be delivered across the wider site has been assessed and established pursuant to the OPP and cannot be revisited in the determination of the Plot 08 RMA."*

Voice 4 Deptford Comments that this contradicts the requirement set out in the 5th Schedule of S106 Section 1.2 which states that 'not less than 15% (by Habitable Room) of Total Dwellings in Phase 1 shall be provided as Affordable Housing Dwellings...' and that this is subject to a Review Process set out in Section 2 of the 5th Schedule of S106. **V4D** would like to see evidence that this legally required Review has taken place and to know by what means CPL can conclude, as above, 'that the amount of affordable housing... cannot be revisited in the determination of the Plot 08 RMA'.

In addition, V4D Comments that Section 8 in the Outline Planning Agreement states 'Each Reserved Matters application that is submitted for a particular Plot or Phase or Sub-Phase shall be accompanied by a Reconciliation Document' [comprising a Development Table and Illustrative Plan] showing 8 (i) (3) 'what has been permitted under this permission but has yet to receive Reserved Matters approval'. In conjunction with this, para. 8 (i)(b) states that the Table 'shall include details of the type and number of Studio, 1-bed, 2-bed, 3-bed and 4-bed dwellings and the number of habitable rooms by tenure and wheelchair accessible housing'. Therefore a much more detailed Reconciliation Statement is required showing where the Affordable Housing in Phase 1 is to be built in order to justify not including any Affordable Housing in Plot 08. **V4D** would like to see evidence that this fuller Reconciliation Statement has been provided, as required by the agreement, in this 'updated' Reserved Matters Application.

V4D notes for example, that in the Reconciliation Statement page 6, 3.5, Table 3 is said to demonstrate that the land use and quantum of floorspace proposed in Plot 08 complies with the Development Specification. It shows that the floor space for Residential Units is less, at 35,750 sqm, than the permitted 37,400 sqm. What it fails to show is how the balance, which has been added to the approved floorspace for the development as a whole, is to be incorporated into the development. On the other hand, the proposal for Private Residential Open Space at 3,184 sqm, is greater than the Plot 08 requirement of 3,105 sqm. What are the consequences for the other plots in Phase 1 and the development as a whole? **V4D's** concern is that the information in the

Reconciliation Statement is not complying with Section 8 of the Planning Agreement and does not give sufficient control over the planning process to L B Lewisham.

V4D has still more concerns about 8.9 of the Planning Statement. We Comment that the Review Process requires an assessment of whether there is an Applicable Surplus in Phase 1, to be paid as an Additional Affordable Housing Payment to LB Lewisham. **V4D** notes that CPL are required to provide an Initial Viability Appraisal Model for approval by LB Lewisham. **V4D** would like to see evidence that this Financial Review process has been undertaken for Phase 1 as is required by the legally binding S106 agreement, Schedule 5.

8.10 Affordable Housing in The Planning Statement says in Para. 8.10: *'There is no affordable housing provided within Plot 08, but the Reconciliation Statement submitted with the RMA demonstrates that this will be achieved on completion of the development.'*

Voice 4 Deptford Comments that the only reference to affordable housing we have found in the Reconciliation Statement is a repetition of the statement above: *3.7 There is no affordable housing element within Plot 08, so it will not preclude the target mix* as set out in the Development Specification from being delivered. This is an unsatisfactory assessment of the situation. It is the view of **V4D** that, considering the various planning mechanisms involved and depleting reserves of socially rented housing CPL needs to state openly and in detail exactly why it is unable to provide Affordable and Social Rented Housing in this block, as in every other block on the site.

To summarise Voice 4 Deptford Comments on the Planning Statement points 8.9 and 8.10: The planning procedures outlined above, though complex and interconnected, offer scope for the L B Lewisham to reconsider the housing plans for Plot 08. If implemented by a willing client and a thoughtful local authority the above Reviews, Reconciliation documents and Tables present an opportunity for better local housing, both social and 'affordable', to be provided in Block 08.

P29 8.16 The Planning Statement says: *'Anchored strongly by best quality streets, squares and open space, including a substantial new park...'*

Voice 4 Deptford Comments: This is an untruth. Where on the plans is the substantial new park?

P 29 8.17 The Planning Statement says: *'As well as physical transformation, the creation of a new neighbourhood at Convoys Wharf has the huge opportunity to bring socio-economic benefits. Together with the Re-surfacing of the High Street, the socioeconomic benefits for the local community of retail proposals for Convoys Wharf include bringing in investment, increased footfall and creating and retaining expenditure, as well as the provision of affordable space for local and small SMEs'.*

Voice 4 Deptford Comments: Huge socio-economic benefits for the wealthy inhabitants of Convoys Wharf perhaps. Nothing in this RMA application demonstrates how CPL intends to spread these presumed economic benefits along New King Street to join, and increase the footfall for, an already struggling Deptford High Street. We fear that, as with other new developments in our area eg. New Capital Quay, the retail units will be left empty, with the future prospect of being turned into yet more private housing. In addition the consequences of the new road surfacing on the High Street have, thus far, been to raise the rents, push out long established retailers and cafes. No cleaning maintenance has been put in place and the area is both dirty and unhealthy.

P33 8.33 The Planning Statement says, Appearance *'The use of brickwork throughout Plot 08 is a response to the local character. However, the inclusion of aluminium cladding and glazing, create a sense of architectural diversity and character across the Development. The detailed design of the plot is described in more detail in the Design and Access Statement and summarised in the below paragraph'.*

Voice 4 Deptford Comments that there is brickwork all over London. What makes the brickwork on Block 08 relevant to our local character? It does not respond to the particular kind of brickwork to be found near the Convoys Wharf site, nor the character of the buildings which exist there.

P36 8.43 The Planning Statement says:

8.43 *'Plot 08 represents an early opportunity to develop the character and set the precedent for Convoys Wharf as a whole. Key themes drawn from both John Evelyn and the sites shipyard history.'*

Voice 4 Deptford comments that there is nothing particularly obvious in the design of Block 08 to demonstrate a theme drawn from John Evelyn and the shipyard. As a landscape architectural commentator has pointed out, Block 08 is an 'anywhere' design, as at home in Hong Kong as Deptford

P39 8.45 The Planning Statement says, about Playspace *'The Development will also accommodate 140 sq. m of children's play space on site within residential courtyard. This provides doorstep playable space for young children under 5 years close to their homes and local playable space for 5 - 11 year olds, in line with the Mayor's adopted Supplementary Planning Guidance, 'Providing for children and young people's play and informal recreation' (accessibility to play space).' Doorstep provision for children over 12 will be provided off site as established in the OPP. Other opportunities for play within Convoys Wharf will come forward in later plots.'*

Voice 4 Deptford comments that the podium is not doorstep playable space. The proposal to provide local playable space is not in line with the *Mayor's adopted Supplementary Planning Guidance or the London Plan Policy 3.6 on 'Children and Young People's Play and Informal Recreation Facilities'* which intend that in a large development play space should be provided on-site. There is nothing in the Outline Planning Permission that specifies the amount or position of playable space. That is a reserved matter and is dependant on the mix and kind of tenure of the housing units.

Summary of Voice 4 Deptford's Comments on Convoys Properties Limited resubmission of RMA DC/18/107698 Convoys Wharf, Block 08 (Phase 1):

Despite L B Lewisham's request for greater quality in its work CPL has continued to be as careless of the facts and cavalier of the planning procedures in this submission as it was in that of June 2018. Quatro Public Relations' interpretation of the public's response to its consultation is selective in its facts and ignores the local community's genuine concerns about heritage, housing type and green space. DP9 Ltd's substantially altered Planning Statement is untruthful in places and apparently dismissive of the real opportunities that the current complex planning procedures provide to enable better local housing in Block 08 (both social and 'affordable'). Furthermore it is blind to the history, bricks and buildings of Deptford Strand and misrepresents the play needs of the children who could live in the properties it wishes to build. This Application for Reserved Matters, Phase 1, Block 08 should be turned down. End of document