

Comments to London Borough of Lewisham on Reserved Matters Application DC/18/107698 Convoys Wharf, Block 08

(Phase 1) and its surrounding environment Submitted in response to L B Lewisham's consultation ending 26th July, extended to 15th August, 2018

By **Voice 4 Deptford**: Address - c/o Pepys Community Forum, 1 Creek Road, Deptford, London SE8 3BT

EXECUTIVE SUMMARY:

The outline planning permission reference DC/13/83358 dated 10th March 2015 is out of time. The UK government in Town & Country Planning Act 1990 'Guidance on the Use of Planning Conditions' says, ref. Sections 91/92, that outline permission must be made subject to two types of time-limit for each phase of a large development. These limits have not been included in the Outline Agreement. Therefore the Outline Planning Consent timed out on 10th March 2018 by default, rendering it invalid.

The application for approval regarding reserved matters on Plot 08 is out of date. Three years have passed since Outline Planning Consent was granted. Phase 1, Plot 08 is an old design which does not reflect recent dramatic changes in financial, housing and environmental conditions.

An imaginative and powerful cultural strategy could bring about a better and more site specific design. One example of a different design which could bring people to London to visit Convoys Wharf is that it was a major base for the Royal Navy at a time when it first protected, then prosecuted, the international slave trade. Building and street design, memorials, art work on this theme could reflect the current mixed heritage population of Deptford. In addition Convoys Wharf could become an international focus for a timely re-evaluation of the slave trade and its contribution to the development of the United Kingdom.

There are substantial legal and procedural conditions which have not been met:

'Due process' on the Application has been inconsistent and incomplete. Reserved Matters Application for Phase 1, Plot 08 was posted on 20 June with more than 20 documents missing. Some have never been submitted e.g Cultural Strategy for Plot 08, documents DWG P10852-00-002-103 and DWGP10852-00-002-105. Hard copies were not provided which discriminates against people without a computer.

Section 106 (S106) conditions are not being met. Outline Planning Consent to build Convoys Wharf was granted to the developer Convoys Properties Limited (CPL) in 2015 in tandem with a Section106 Agreement (10 March, 2015) signed by CPL, Lewisham and the GLA. An absence of evidence points to the fact that these legally binding S106 conditions, particularly those concerning housing and a Cultural Strategy,

have not been honoured in this Application.

No Financial Viability Transparency. Repeated EIA requests to LB Lewisham and the GLA have failed to make any of the financial viability information entirely transparent to the public. Yet the Mayor of London has stated that FVS's should be made available in their entirety and, in a Greenwich Ruling of January 2015, a judge agreed.

Misleading documents. The Planning Statement is a generic document adapted for the Plot 08 application. (See references to Elephant Park.) It does not specify the planning history and what the outline permission states in relation to Plot 08. This shows contempt for the planning process.

Disregard for policies and regulations An outstanding example of a blatant disregard for regulation appears in the Design and Access Statement on Fire Precautions Phase 1, Block 08.

There are particular aspects of Application DC/18/107698 which warrant criticism:

A) Aesthetic and design: In accordance with Lewisham's Local Development Framework (page 137: 8.3) Plot 08 must be revised to create a straight line of travel 'from the anchor to the river'. The building should also be context-sensitive and site-specific with much more green vegetation and landscape all of which should reflect its historic significance.

B) Housing & Accommodation: Phase 1, Plot 08 is 100% private flats with no socially rented housing. LB Lewisham's target of 50% affordable housing and its Core Strategy Policy for 3-beds+ on sites with 10+ dwellings should be met via the S106 Affordable Housing and Review Mechanism (Schedule 5 Para 1). The Borough should also accept the Mayor of London's new funding for developments which meet, or exceed, 35% affordable housing provision without public subsidy.

C) Children and young people's needs: The interior design of the building on Plot 08 does not provide suitable space for children and young people. 'Inter-visibility' between them and their parents is also missing from this design. Convoys Wharf is expected to provide playable space on-site (SPG S4 London Plan) for older children. The young people themselves have not been consulted as they should have been.

D) Environment and Green Space: Plot 08 block needs to have much more vegetation on balconies, walls, roofs, at street level, in the podium to comply with Policy G5, Urban greening, Chapter 8 of the 2017 Draft London Plan. This is to ensure sustainability, biodiversity, mitigating climate change and making Deptford Greener.

e) Culture and heritage: Convoys Properties Ltd has failed to implement S106 obligations to establish an ongoing steering group to advise it on all cultural matters concerning Phase 1, Plot 08 and the whole site. LB of Lewisham must enforce CPL's legal obligations which will result in a higher quality cultural influence on the design, layout and details of the plan and better social cohesion.

Conclusion: Please refuse consent to the application to build Block 08 (Phase 1) unless CPL conform to the letter and spirit of planning legislation, the outline plan and the S106 Agreement.