

Comments to London Borough of Lewisham on Reserved Matters Application DC/19/112403 Listed Building Consent in relation to the demolition of a portion of the south section of the Eastern Boundary Wall, and erection of hoarding and entrance gates to Convoys Wharf at Watergate Street Deptford SE8

Voice 4 Deptford makes these Comments (31/07/2019) in response to the submission of the Application for approval of reserved matters for Listed Building Consent in relation to the demolition of a portion of the south section of the Eastern Boundary Wall and entrance gates to Convoys Wharf at Watergate Street.

We strongly object to:

- A. The demolition of a part of the Grade II listed wall and
- B. the entrance Gates to Convoys Wharf at Watergate Street

A. Demolition of a part of the Grade II listed wall

Voice 4 Deptford objects to the proposed demolition of a part of the Grade II listed wall, along Watergate Street, on the grounds that it is unnecessary demolition of a part of an integral whole of the extant wall surrounding the former Deptford Royal Dockyard and former Royal Victoria Victualing Yard.

The preserved wall, as a whole, built at different periods in time, gives an historic setting to the local area, both for the historic below-ground remains of the Deptford Dockyard and the remaining above-ground Office Quarters Terrace along with the Shipwright's House and the Olympia warehouse.

Voice 4 Deptford comments that the surrounding wall had a dual purpose: to be secure from outsiders and to securely supervise what exited from the site. This part of the wall is close by the former Clerk of Cheques entrance/exit, on what was King Street (now Watergate Street).

The history is well documented in "The Deptford royal dockyard and manor of Sayes Court, London" - Excavations 2000-12, Antony Francis, Museum of London Archaeology (MOLA).

Voice 4 Deptford further comments that any future redevelopment should celebrate and preserve all of the existing and unique features of the site for the better appreciation and benefit to all.

Yet, the underlying purpose of this proposal is only to provide a Temporary Access Road for a period of 3 years, to the Plot 22 riverside. Whereas the loss of a part of the listed wall would be a loss forever to the local area and the nation.

Regrettably the remaining above ground features of the 16th Century Tudor Storehouse, a scheduled ancient monument, were lost only as recently as in the 1950's to 1970's. At that time, for short term commercial reasons. The below ground remains are of a high importance.

See: www.geotechnics.co.uk/blog/case-studies/convoys-wharf--from-tudor-warfare-to-21st-century-redevelopment

On this stretch of the wall along Watergate Street, there are already two steel gated access points. One or both of which, could be readily re-purposed to give access. One could even be an Eastern 'IN' Gate, and the other an Eastern 'OUT' Gate. This could be for a temporary use during the site redevelopment.

This alternative, would NOT result in the loss of any of the listed wall.

1. Document Submitted by CPL

Built Heritage Statement

Below is a small selection summary taken from the Built Heritage Statement, Pages 4 and 5. NPPF states a heritage asset as a: "building, monument, site, place, area or landscape identified has having a degree of significance meriting consideration in planning decisions because of its heritage interest."

This includes designated and non-designated heritage assets.

Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and planning decisions are "an irreplaceable resource, and should be conserved in a manner appropriate to their significance."

Under considering potential impacts: "great weight should be given ... irrespective as to whether any potential impact equates to total loss, substantial harm, of less than substantial harm...".

Paragraph 195 states that "where a development will result in substantial harm to, or total loss of, the significance of a designated asset, permission should be refused, unless the harm is necessary to achieve substantial public benefits, or a number of criteria are met". Where less than substantial harm is identified paragraph 196 "requires this harm to be weighed against the public benefits of proposed development".

Paragraph 200 notes that local planning authorities should look for opportunities for new development ... with the setting of heritage assets.

Planning Practice Guidance (PPG)

Key elements of the guidance relate to assessing harm. It states that substantial harm is a high bar that may not arise in many cases and that while the level of harm will be at the discretion of the decision maker, generally substantial harm is a high test that will only arise where a development seriously affects a key element of an asset's special interest. It is the degree of harm, rather than the scale of development, that is to be assessed. Importantly it is stated harm may arise from works to the asset or from development within its setting. Setting is described as 'the surroundings in which an asset is experienced, and maybe more extensive than the curtilage'.

The advice suggests a structured staged approach to the assembly and analysis of relevant information, this is as follows:

1. Understand the significance of the affected assets,
2. Understand the impact of the proposal on that significance,
3. Avoid, minimise and mitigate impact in a way that meets the objective of NPPF;
4. Look for opportunities to better reveal or enhance significance,
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change, and,
6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating, and archiving archaeological and historical interest of the important elements of the heritage assets affected.

Historic England list a 5-step process:

1. Identify which heritage assets and their settings are affected;
2. Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
3. Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
4. Explore ways to maximise enhancement and avoid or minimise harm, and,
5. Make and document the decision and monitor outcomes.

Built Heritage Statement continued

Page 7 - Map - The 250m search parameter is very narrow. It should be 300m or 400m. The current search leaves out the Victualing Yard Gates on Grove Street, Deptford High Street Conservation Area and many others.

The extent of the Deptford Dockyard and the Victualing Yard coincided with John Evelyn's ownership of land and his Sayes Court House and extensive Gardens. Exchange of land and boundaries changed many times over the years according to demand.

Page 9 - Very poor photographic reproductions in Figs 6 & 7.

Summary of the Built Heritage Statement closes here.

Note: It is on this level detail that the applicant has argued for the demolition of a part of the existing boundary wall.

2. Design Codes

Deptford Neighbourhood Action (DNA) commissioned AR Urbanism to carry out workshops with the local community on Design Codes, from January 2019. One of the outcomes was ideas on how to integrate the boundary walls with new development. Without damage to the wall, it would be possible to design additional structures that would allow for a more playful use - and to be made accessible to adults and children.

<https://deptfordaction.org.uk/meetings/convoys-wharf-design/>

The Reserved Matters Applications for Plots 10 and 11, to front directly on to Watergate Street, have not as yet come forward to the public. This means that revisions on detailed design can potentially still incorporate the Design Codes ideas. Similarly, with Plot 09, all of these 3 Plots have a relatively small footprint on the site, and planning revisions that retain all of the Eastern Boundary wall along with the existing wall, can be made to enhance the outcome.

Voice 4 Deptford believes that a very clear harm will be done by the removal of a part of the historic wall along the Eastern Boundary. Both in itself, as a built record of evolving local history over a long period of changing times, and owing to the whole wall now being a setting from the former Deptford Dockyard and remaining an historical setting to this day for the listed building and features present.

The application for demolition should be refused on these grounds.

B. Entrance Gates to Convoys Wharf at Watergate Street Deptford SE8

Voice 4 Deptford comments that our previous concerns have not been met regarding:

1. Lack of a works traffic management plan and Code of Construction Practice Document which was promised in the Reserved Matters Application (RMA) DC/13/83358 Convoys Wharf, Plot 22 (Phase 1)
2. Danger to protected trees
3. Danger and Nuisance caused to local residents, local businesses and the adventure playground in Prince Street
4. Lack of consultation with local residents

Voice 4 Deptford repeats that the underlying purpose of this proposal is to provide only a Temporary Access Road for a period of 3 years, to the Plot 22 riverside. There are other possible access routes which should be considered.

1. Lack of a management plan and Code of Construction Practice Document

Voice 4 Deptford finds it impossible to imagine how works traffic can access the proposed entrance. The options of Watergate Street and Prince Street are too narrow for existing traffic and tend to be used as a rat run from Evelyn Street.

Voice 4 Deptford would like to see the document where details have been agreed with LBL Highways Authority for the construction traffic management plan and Code of Construction Practice.

See: Planning Statement in the RMA for Plot 22

8.56 Details are to be agreed with LBL Highways Authority. The information will be set out in the Plot 22 Code of Construction Practice and will set out the requirements for all contractors working on the Plot 22 development.

2. Danger to protected trees

Voice 4 Deptford Comments that of all the possible means of access, Convoys Properties Ltd (CPL) have chosen a route which passes between and over the roots of protected trees. It raised the question of whether they are serious about preserving these trees. The proposal to open up this route to the jetty will no doubt damage the trees. Mitigating harm reduces harm but does not to avoid it.

Three trees will need selective branch reduction/removal of those overhanging the road to facilitate the access road and prevent potential future conflict with larger HGV such as bin lorries, which measure 3.6m in height. This interference in the trees' growth and reduction of valuable canopy at a time when trees are increasingly important would not be necessary if access was made elsewhere.

3. Danger and Nuisance caused to local residents, local businesses and adventure playground in Prince Street

The Dog and Bell Pub and the adventure playground in Prince Street would be adversely affected, as would residents in both Prince Street and Watergate Street by this proposal to open up a temporary access route. People entering and leaving the pub as well as young people using the adventure playground would be endangered from risk of being run over and the increased levels of traffic noise and pollution. V4D has previously asked, in our comments on Plot 22, if CPL are aware of the present unacceptably high levels of pollution in Prince Street and Watergate Street which will considerably increase if this plan goes ahead. Voice 4 Deptford has not received a reply to our question. There has already been damage to the Convoys Wharf boundary wall from at least one large vehicle attempting to pass along Prince Street.

4. Lack of consultation with local residents

Voice 4 Deptford is yet to see, as requested in our submission on Plot 22, the evidence that the Twinkle Park Trust, owners of the Master Shipwright's House and residents of Watergate Street in the Royal Borough of Greenwich have been engaged. Some of these groups may be over the Borough boundary line but the proposals will have a strong impact on them. It would be extraordinary if no one has asked them.

To Summarise: Voice 4 Deptford Comments that in proposing to demolish part of the Grade II listed wall and will cause harm to precious heritage assets. The resulting entrance gates to Convoys Wharf at Watergate Street and the proposed route for construction and other traffic fail to take local conditions into account. There is a lack of attention to detail

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on where construction traffic will pass, carelessness of trees and the local environment and a lack of respect for local residents.

Voice 4 Deptford requests that this application for Reserved Matters be turned down.

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