

# **Comments to London Borough of Lewisham on RMA DC/19/111912 Block 15 (Phase 1) Submitted in response to London Borough of Lewisham's consultation ending 31 May 2019**

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#### **Draft Concept Paper.**

Sayes Court Gardens and the Lenox. Heritage projects and their place on the Convoys Wharf Development, by Richard Katona.

## SECTION ONE

### Comment on the consultation process for RMA DC/19/111912 Block 15 (Phase 1).

#### Background:

The RMA DC/19/111912 document *Statement of community consultation* is presented by Quatro the public relations agency, on behalf of CPL. In it Quatro makes a number of statements based on exhibition boards which include text, illustrations and photographs.

**Voice 4 Deptford** makes the following comments on this consultation exercise.

**Quatro states** (p.6) that it sent an email to stakeholders in Deptford on 18<sup>th</sup> February 2019 announcing a *Public Exhibition* on Plot 15 of Convoys Wharf to start on 28 February 2019 and run for two days.

**V4D Comments:** A *Public Exhibition* is not the same as a *consultation*. Not one word on the boards shown at the event said 'consultation', or 'we want your views', or 'speak to us about your ideas'. The whole tenor of it was to demonstrate to local people what decisions had already been taken by the developer/architect rather than to engage with local people about Plot 15. It was a piece of theatre in which we, local participants, were to play the role of an enthralled audience. Furthermore the amount of time – 10 days – between email and Exhibition was insufficient notice, showing lack of respect, for the community it was supposedly consulting.

**Quatro states** (p10) that eighty one people attended this exhibition and eight people left comments. In presenting its findings Quatro then produced a pie chart, based on eight people.

**V4D Comments** that 8 people of 80 is hardly an acceptable sample. Most of the comments from those 8 people were neutral or made suggestions, none of which appear to have been taken up in the subsequent RMA DC/19/111912.

**Quatro states** (p. 7) that there was an update on the Cultural Strategy.

**V4D Comments** that instead, there was muddle about the cultural strategy and an absence of the truth about the cultural steering group (See Section D).

**Quatro states** (p.15) that CPL will continue to engage with the community.

**V4D Comments** that neither CPL nor Quatro show much sign of engaging with the community. Their approach to the establishment of a Cultural Steering Group indicates the reverse.

**Quatro refers** (p.20) to 'Royal Caroline Square'

**V4D Comments:** It really does not help local people gain ownership of a location if developers and their agents use names/references/connections for sites which are have not been agreed by local people and might be alien to them. Would Deptford warm to 'Royal Caroline Square'?

**Quatro states** (p.24) 'Half of all homes to be for social rent. These will be open to those on the council waiting list.'

**V4D Comments:** This statement is, at best, misleading and, at worst, economical with the truth. It is indicative of CPL and Quatro's lack of regard for local people and commitment to honesty, that they used the term 'social rent'. For those who live in Evelyn ward (the location chosen by CPL for the Exhibition) 'half of all homes to be for social rent' means that half of

Plot 15 properties will be available to those on the housing list, will be supported by housing subsidy (ie. local council rent in Lewisham) and have security of tenure. Instead, the rent in Plot 15 properties will be 60% higher than the local council rent and there will be less security of tenure (up to 5 years rather than lifetime). Information on the board therefore amounts to little more than a communications ploy and any comments regarding the type of housing on Plot 15 should be dismissed.

**Quatro states** (p.26) that 'consulting with a number of local arts and cultural groups' a cultural strategy has been established.

**V4D Comments:** no local arts and cultural groups are named or evidence provided for any work on this. As we know (Section E) the 'cultural strategy' was presented as a fait accompli to a scarcely functioning Cultural Steering Group by an agency, Fourth Street. This is another example of outright misrepresentation by Quatro of the facts.

**Summary:** The mounting of a *Public Exhibition* by Quatro by which it thought it could consult with local people was rushed, misleading and superficial. It yielded precisely 8 comments, 10% of those people who showed up in an inner city location inhabited by thousands. As a consultation exercise it would be laughable if not so arrogant. Many of the statements on the presentation boards were partial or untrue and display a lack of respect for the community CPL is supposed to be consulting.

## SECTION TWO

### Specific Comments on aspects of Reserved Matters DC/19/111912 Convoys Wharf, Block 15 (Phase 1)

#### A. Aesthetic and Design

**Voice 4 Deptford Comments:** Convoys Properties Limited and the L B Lewisham have brought forward a plot with some non-private housing. The aesthetic and design of this plot however falls short of providing the people of Lewisham with the type and quality of building and housing that it deserves.

#### General Comments

- The way the building is aligned, south of the access road, creates a social division between the 'affordable' section of this development to the north, all of which will be private.
- Insufficient attention has been paid to long views and a sense of open space in the orientation of the building. This contributes to the sense that this block is not part of the rest of the Convoys Wharf development, the 'poor quarter'.
- Transport/access route will make this Plot 15 noisier and more crowded than elsewhere on Convoys Wharf.
- The style of building has an 'anywhere' feel, despite the architect's intensive research into the Georgian and Victorian character the Deptford High Street. It is hard to fathom a 'bottom', 'middle' and 'top' in the design.
- The choice of materials creates a dark and looming presence, particularly when seen against the backdrop of the light grey, low rise, and aesthetically harmonised Sayes Court Estate.
- Size and shape of the properties are boxes for profit rather well considered pieces of architecture.
- Significant details of local aesthetics e.g tiling, which might have informed the design and detail of Plot 15, have been ignored, or missed.
- Numbers of bedrooms is not appropriate for L B Lewisham where the need is for 3/4/5 bedroom units rather than 1/2 bedroom units.
- "The Client Brief is for the building to be an affordable housing block for both intermediate and social housing tenures. Whilst the building will be tenant blind, there will be a physical separation between the two as they will be managed separately." Comment: Intermediate housing (shared ownership) is a form of private ownership by allowing a 'share' to be bought and owned along with renting a share. With the aim of achieving the full ownership over a period of time.
- A developer and the builder of the intermediate housing will make a higher return (and by building in a higher quality) than from affordable rent housing.
- The 'social housing' is at affordable rent. London Affordable Rent (LAR) - is set at a 60% higher rent than local Council social housing; like that on the Sayes Court estate.
- In other documents, such as the correct term of affordable rent is used.
- In addition, there is no detail given about the security of tenure, in years. Nor the Service Charges that will apply.

#### Detailed comments:

##### 1 Build Design Statement

“As part of Condition 7 of the Outline Planning Consent a Building Design Statement has been requested to discharge the Reserved Matters application for individual plots.”  
“The design of Plot 15 has been developed within the controls set out in the Convoys Wharf CWO5A Development Specification (February 2014). The design has been informed by the contents of the Convoys Wharf Design Guidelines CW04 (April 2013).”

**Comment:**

- The design of the whole scheme is ‘out of date’. Things have moved on dramatically from over 5 years ago. The whole scheme needs a ‘refresh’ of new thinking, if not a complete restart for a much better scheme.
- Deptford Neighbourhood Action (DNA) for the Draft Deptford Neighbourhood Plan has commissioned through AR Urbanism consultants working directly, through workshops, together with the local community – in 2019 – on new work on Design Codes. Ref: Deptford Design Codes Final\_190416\_loresFS 170419.
- Bringing out new innovative ideas and thinking to improve the scheme. Plan view illustration Fig 02 – Page 7. Plot 15 as it is, is located “at the back” of the whole site from the River Thames frontage. No direct views, at all, on to the riverside. No direct views in to the feature Olympia Warehouse listed building central square.

## 2 Housing

**Comment**

- Page 15 – Proposals. “Residential units (11,425 sqm, Class C3). 60 social rent, 64 intermediate. Comprising: 30: 1-bed, 71: 2-bed, 21: 3-bed, 2: 4-bed.”
- Comment – 1-bed & 2-bed are the easiest to build and the most profitable apartments to sell.
- Fig 11 - The dark and dull new building of Plot 15, turns its back on the existing low rise, light and open Sayes Court estate. 81.4% are 1-bed & 2-bed, with 57% being 2-bed apartments. Only 18.5% are 3-bed & 4-bed, which are the real housing need for Lewisham residents on the Housing Waiting List, of 10,000.
- But, these are NOT at Council social rent levels – they are at Affordable rent, set by a Housing Association, that will be at 60% or more higher rent.
- The Housing Association, under the S106 Agreement for affordable housing, has to buy the land from the developer. Because they do not lease or rent the land.
- The builder and private developer, generally make a range of profit margin, low profit from social rented housing, a medium profit from affordable housing, and a high profit from private housing.
- A private developer produces a Financial Viability Statement to show how much affordable housing they say that they can ‘afford’ to build for the S106. Whilst still making a ‘market profit’. With a long build out – like Convoys Wharf, over 15 years in 3 Phases - this profit can also be reduced over time, meaning that less affordable housing then gets built overall. To ‘gain back’ more profit.
- The positioning of Plot 15, is a ‘downtown’ quarter. As 100% affordable housing. This is class distinction. This is not acceptable. The whole scheme should be open equally to all residents and future visitors.
- Photo aerial view Fig 01 – Page 7. The existing mainly social housing – the Deptford estates – are principally low rise, open and readily permeable by all.
- Page 8 – Fig 03 Site location plan. This shows that Plot 15 is ‘squeezed in’ in front of the existing Sayes Court estate. It will block any immediate or long views for local residents towards the riverside. With other, and taller, future buildings entirely blocking any distant views to the River.

- The estate around Dacca Street has a central open area, that is open to all, and is viewed by 4 existing housing blocks. In 2019 new tree planting of 4 trees, has taken place here by Evelyn 200, to enhance the green of the square and assist with carbon pollution reduction. There are also 2 existing mature very tall trees.
- The PTAL of 2 is very low, where a rating of 4 to 6 is good to excellent. For a large high density housing scheme this is not acceptable.
- A 'private only' - only for new residents – playground (yet then only for 0-4 yrs old).
- Is proposed, 'at the back' of Plot 15. Yet this is directly facing the existing residents on Dacca Street. This is class distinction, and socially divisive.
- Page 11 – Fig 16 – Shows that block A is for Affordable Rent (not described as social rent – unlike on Page 6.)
- 40 flats out of 60 Rented are shown as 1 & 2 bed = 67%.
- 61 flats out of 64 Intermediate are shown as 1 & 2 beds = 95%
- Overall Plot 15 will have 74% as 1 & 2 bed flats.
- The housing need in Lewisham is clearly for more family sized 3-bed, 4-bed or larger.
- Plot 15 will have Rented 18 flats 3-bed and 2 flats 4-bed = 33%. Just 20 flats.
- The Intermediate has 3 flats 3-bed, none any larger.
- Giving a total of 23 flats 3 & 4 bed of 124 flats = overall 18.55%. This is unacceptable to meet current Lewisham housing crisis need.
- In Phase 1, with 3 to 5 years build out period, it will only serve to exacerbate the housing crisis in Lewisham.
- Remembering that Plot 08, at the same time, is for 462 private flats to be predominantly 1 & 2-bed.
- Along with Plot 22 as a Marketing Suite, to sell the private apartments world wide.
- No indication is given about the security of tenure for the Affordable Rent.
- For a new tenancy, with a Housing Association, it is likely to be for just 5 years.
- In Block A – Affordable Rent – 6 units are for Disabled compliance. In Block B – Intermediate – 6 units are for Disability compliance. Giving 12 units in all = 10%.

### **3 Commercial and business activity'**

Plot 15 will be a residential building with commercial and business activity on the ground floor.

#### **Comment**

- At present, Convoys Wharf has a high surrounding wall. There is no indication given that local residents will have any direct access to the new 'commercial and business activity'.

### **4 The Visuality of Plot 15**

#### **Comment**

- The overall shape of Plot 15 is a narrow irregular octagon looking like a bent letter 'L' in plan view, for the residential part. This is then internally physically divided in to 2 parts – one part for affordable rent and one part for shared ownership. A third 'space' is the private playground and car parking/services." The outdoor space to the South of the building will be designed as an outdoor amenity space for residents".

- Page 11 - "... the master plan will create a high quality vibrant waterfront for the people of Deptford .Yet, Plot 15 new residents will get no view of it at all, by being 'hidden away' at the back of the scheme.They will be placed towards the outside, like the rest of Deptford people with this scheme.
- "Plot 15 sits on a key location in the master plan .No it doesn't. It is 'tucked away', by being placed out of sight as much as possible. Where it will be over dominated by first of all, Plot 08 – with much denser and taller buildings – and then by the very tall 3 towers and other highly dense buildings that are proposed to be very prominent along the riverside.
- Page 12 – 3D rendered view of the whole development proposal. Clearly shows how the relatively 'low rise' - up to 8 storeys – of Plot 15 is to be over dominated by Plot 08 and the very dense and tall buildings leading up to the riverside."Plot 15 is a mid-rise building and serves to transition the massing up to Plot 08, which is taller than Plot 15 and considered a 'feature building'."
- Page 13 – 3D rendered view of Plot 15, Fig 08.The rendering reveals a very gloomy looking building - a new building that already resembles an old industrial Dickensian warehouse. Through the architects deliberate design choice of a very dark brick colour – materiality. Then with the 'added gloom' of what looks a 'battleship grey' fenestration by the architects choice of dark framed windows throughout (both for the living accommodation and the ground floor business/shop fronts.
- Page 16 – Figs 10 and 11, show the dark gloom of Plot 15.Together with the external 'black shadows' the building will further cast on to itself.
- "The massing of Plot 15 follows the approach of stepping down at the existing low rise community to the south and the stepping up to the emerging context of Plot 08." Clearly an admission of the low rise surrounding context of the existing Deptford estates, and the stepping up in both very density and height, of the proposed new massing of the whole site.
- Page 17 - "The proposed massing is compliant with the massing principles of the consented master plan, the building is lower at the perimeter of the development, stepping up towards the centre of the scheme."
- Fig 15. Little facade detail on the building – having no distinctly clear base, middle and top – that is cited as being a clear feature reference on Deptford High Street, as a key influence.
- Page 20 - "The building will be broken up in to clear horizontal and vertical massing elements..." Yet, there is very little difference being shown, between base, middle and top of the building, in practice."The colours of the brick relate to existing local brick selection..."
- The dark and gloomy architects choice is the opposite, for example, of the light yellow and pale grey brick selection of the existing Sayes Court estate.Perhaps, perversely so – the architect has chosen not to 'harmonise' with the existing.Preferring to contrast, by making a dark and gloomy choice. To then not to be associated with the existing.
- Page 37 – Massing Strategy". Plot 15 is a lower rise supporting building within the master plan context." This aptly summarises the importance awarded to the Plot 15 building – placing it in the 'lower orders'. Figs 60, 61, 62, 63 – shows its poor relationship on the site. Page 39 – Proposed massing - Fig 64 – shows Plot 15 is tall and bulky. The view is looking outwards to the Sayes Court estate of low rise. No view is shown on the massing impact, from the Sayes Court

viewpoint. Page 40 – Architectural character - Fig 65 – shows the sharp ‘right angle’ deflection, of the long vista from Deptford High Street. Not a direct line.

- The central massing of very tall buildings by the riverside is given more importance. None of the photographic references, from the surrounding area, have been enacted in the proposed design.
- Plot 08 – Fig 71 – is a little less grim in materiality, when compared to Plot 15.
- Yet, neither properly respond to the local Deptford character and its unique heritage. They are ‘New Urbanism’ developer designs – bland, unambitious, and can therefore be located anywhere.
- Page 42 – Building articulation. Bland and predictable. Dull and unexciting in every aspect.
- Page 43 – Facade composition. Figs 77, 78, 79 – lacks any inspiration, taken or used from the local references.
- Page 44 – Material palette - “A reduced colour palette is introduced that revolves around the base red brick ...” Figs 80, 81 – Dull. The LCC example - Fig 82 - has much taller windows, with white fenestration, and much more variety of interest. Together with a much lighter red brick material use. Plot 15, is a dark and monotonous repeat of the same, and the same, and the same.

## **5 Naming**

### **Comment**

- Page 15 - “Plot 15 falls in two of the defined character areas. Eastern Gateway and Evelyn Quarter. Plot 15 is visible from two key proposed squares: Tsar Peters Square and Royal Caroline Square.” None of this “naming” of areas or streets have yet been discussed with the people of Deptford.

## **6. Design and Access Statement**

### **Comment**

- “The building materiality and will be inspired by and link back to both the existing context of Deptford and the emerging context from Plot 08.” The choice made, is dark and gloomy. The existing Sayes Court estate is very light coloured.
- Page 7 – Fig 02 – The location is at an edge of the whole site that is the furthest away from the River Thames and it has no riverside views or long vistas.
- Page 9 – Fig 04 – A hotel, Class C1, of 3,300 sqm, has been removed from the master plan 2013 and OPP.
- “The implementation of the scheme in Deptford will create many benefits for the local community with direct and indirect opportunities for job creation”. What and how many, are these ‘many benefits’? What are the specific direct and indirect job opportunities? Removing the hotel, has removed a potential larger employer and service. From Phase 1? Where is the hotel now going to located? Will it be an even higher building? Will it still be in Phase 1?

## **7. Disability Provision**

### **Comment**

- Are all Disability access flats, at the higher levels of 6, 7 & 8? See Figs 12, 13 & 14. However, a direct close by comparative is the Lendlease site, Deptford.
- Where in Phase 1, Plot 2, only 1 unit has actually been sold to be occupied for Disability. The remainder have all been sold on to the open market, along with any reserved Disability car parking spaces. This is an important factor for Planning Officers and Planning Committee members to note.

- That is, allocating a 10% Disability provision through Planning, DOES NOT MEAN that it will be actually taken up by disabled persons in a private development for luxury housing apartments. Meaning that the 'Policy' is not achieving its intended outcome.

## 8. Temporal Considerations

### Comment

- Page 16 – Fig 28 – Shows Dacca Street square, on the Sayes Court estate. Open and accessible for all. Light yellow brick and light gray characterisation.
- “Most development on the boundary of the site is from the post war period, connectivity is poor and the urban grain does not create a coherent neighbourhood.”
- The narrow streets are an important heritage feature of the Deptford area, from the earlier Royal Naval Dockyard use and later. They were protective of access, that was for commercial and security reasons. They are an attractive feature both to sensitively restore and enhance – like revealing the cobbled streets and pavements.
- Page 17 – Missing a map from the 18<sup>th</sup> Century. Part of Plot 15 is on the former John Evelyn, Sayes Court land. Will also impact on the new Sayes Court Garden project, on Plot 16.
- Page 18 – Plot 15 is not directly accessible, by walking, from the adjacent Sayes Court estate – only via the main New King Street entrance.
- Page 19 – The 'Primary Route' demarcates the 'downtown' areas of the site.
- In to the 1/3rd of the site that has no direct view, or long vista view, on to the riverside.
- This is where the affordable housing is located for Plot 15 – as the least desirable area. Effectively the 'back side' of the site from the riverside. This will get the most traffic movements, being on the access road – primary vehicular route - and bus route.
- Page 20 – The 7 'Character Areas' have not been discussed with the Public.
- A wider cultural perspective on character and heritage is needed. “The Eastern Gateway Character Area links Deptford High Street to the River Thames creating a key between the existing structure and the new development.” But, it does not do this. Plot 08 as a 'feature building' blocks the long vista from Deptford High Street.
- All of the new buildings in the 2/3rds of the site, beyond the primary vehicular route (access road), are very high, very dense and wide, to block any riverside perception and views. There is a clear failure to implement good design.
- The Eastern Gateway does not open up the historic Dry Dock, as a prominent feature on the whole site. Rather it hides it away under landscaping.
- The design of the area does not advertise itself a principal route to the river. Rather it disguises it.
- Plot 15 will be separate from the existing Sayes Court estate. No attempt to integrate with the existing community. Rather create a new separate gated community.
- Page 23 - “A private open space to the rear of the building”. “There is opportunity for a pedestrian connection between the private amenity space at the rear of Plot 15 and Tsar Peter’s Square”. Yet, not available for the general public.

## **9. Waste strategy**

### **Comment**

- Page 79 – Waste strategy - Conventional waste collection in bins. 50% bins allocated for mixed recycling. No on site food waste recycling provision.

## **10.Landscape character areas**

### **Comment**

- Page 82 – Landscape character areas - None of this has been consulted on with the Public.

## **11.Residents Garden**

### **Comment**

- Page 84 – Residents Garden - “The concept of the garden is inspired by a flowing natural river which is represented by a more controlled river of stones and plants.” This is not a bad idea! Yet it is only aimed at 0-4 yrs, and is a private garden not to be shared with the neighbouring Sayes Court estate residents, or the wider public. Yet the new Convoys Wharf residents can share all of the public open space on the Sayes Court estate.
- Page 95 – Sunlight study - “...the Residents Garden benefits from a South facing aspect and receives high levels of sunlight throughout the year.” Page 92 – Existing trees - Tree Preservation Order.
- Page 101 – Boundaries - A walled boundary (1.8m ht) to the West creates a clear distinction between the private residents garden and the public space.

## **12 Heritage**

### **Comments**

- Page 5 - “The Convoys Wharf site is not within a conservation area, nor in close proximity to one; the closest ones are Deptford High Street and the St Pauls’ Conservation areas.”
- “There are also two Grade II listed buildings and 1 Grade 2 building within 100m of Plot 15 ...”
- Page 8 – London Plan – Policy 7.8 Heritage assets and archaeology. Planning decisions.
- C – Development should identify, value, conserve, restore, reuse, and incorporate heritage assets, where appropriate. D – Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural details”.
- LB Lewisham Core Strategy 2011. “Spatial Policy 1. 5. All new development will need to ensure principles of good design addressed ... and heritage assets protected”. “Policy 15 High quality design for Lewisham. F. ensure any development conserves and enhances the borough heritage assets, and the significance of their settings, such as conservation areas, listed buildings, registered parks and gardens, scheduled monuments and the Maritime Greenwich World Heritage site.”
- “Policy 16 Conservation areas, heritage assets and the historic environment. The World Heritage Site buffer zone for the Maritime Greenwich World Heritage Site is identified on the Proposals Map ...” “Policy 17 The protected vistas, the London panorama, and local views, landmarks and panoramas”
- “DM Policy 36 – New development, changes of use and alterations affecting designated heritage assets and their setting conservation areas, listed buildings, schedule of ancient monuments and registered parks and gardens”

- Page 9 – Historic Environment Record - “An area search of 250m from the centre of the Convoys Wharf site was decided on”.
- Page 10 – Assessment of significance - “Currently, the entire site, including the Plot area, is barren, apart from the listed Olympia building (P07), a modern aluminium shed to the north-west of the site, and some brick built workshops, located to the south and south-west respectively.”

## **B) Ecology and Environment**

**Voice 4 Deptford Comments:** Convoys Properties Limited have brought forward a plot with limited ecological and environmental merit. This is because;

- The whole of Convoys Wharf site is on archeological heritage World Monument Watch list. Nothing in the Plot 15 positioning or architecture honours the importance of this. Adjacent to Sayes Court Park and the new Sayes Court Garden Project an opportunity to provide world class architecture has been missed.
- Deptford High Street and St Paul’s are conservation areas yet the developers for Plot 15 only offer the people of Deptford a ‘neutral contribution’ to the significance of the conservations. Why does Plot 15 aspire to make a positive contribution to these?
- The hotel has been removed from this plot, contrary to the OPP. Whilst this means that the ecological footprint on this plot will be lighter it also means that employment opportunities for the people of Deptford will be weaker. Where this hotel is to go now is unclear.
- Despite appearance to the contrary the mixed use nature of Convoys Wharf is very low. It is 77% private housing. Yet this on a site which has been a major centre of local employment.
- Energy centre will be a gas powered system. This method of providing energy is out of date as of 2019, let alone when the whole of Convoys Wharf has been completed. Some other developers in the locality e.g. Lendlease are swapping to a localised system of energy supply in each block instead of centralisation. This means a less carbon heavy footprint.
- Seven character areas, whilst forming part of the OPP, need a complete overhaul lead by the local community under the guidance of the Cultural Steering Group. In a primarily mixed heritage part of London (approx 76% of all school children in L B Lewisham are mixed heritage) it is unacceptable that a developer chooses royal and empire associations on behalf of the local community.
- The ‘fantastic new park’ is only an open space around the ‘Olympia’ warehouse. This goes nowhere towards the meeting the needs of young people and children in the area.

## **C) Children and Young People’s Play and Informal Recreation**

### **1. Convoys Property Ltd (CPL) Stated Play Strategy**

The question ‘Where do the Children Play?’ has been raised consistently during public meetings and exhibitions regarding Convoys Wharf, but no clear answer to this question has been given. There has been either an inability or a reluctance to spell out where play spaces have been allocated within the Convoys Wharf site. Nor has there been any clear admission on the part of the developers of their reliance on local parks. They did not respond to the

question of whether there has been any consultation about their strategy with current users and those responsible for these parks.

The **Community Consultation Statement** gives the clearest description to date of the Play Space Strategy of CPL:

*A Play Space Strategy has been included within the agreed outline planning permission. The strategy aims to offer play space to children at a range of ages.*

*Play space will come forward throughout each phase of the development and include:*

*Doorstep play space for 0-5-year olds within communal courtyard areas;*

*Play facilities for children aged 5-11 within publicly accessible open spaces;*

*Safe and accessible routes to existing play and social spaces for the children aged 12+.*

**There is no mention of this play strategy within the OPP or Section 106 Agreement.**

CPL say that the Play Strategy has been included within the agreed outline planning permission. This is not the case. Nowhere in either the OPP or S 106 documents have we found mention of this play strategy. The OPP requires that play and recreation spaces for children and young people be agreed at the detailed application stage. See **OPP Conditions to be discharged prior to commencement of the development 20. (i) (f) Reserved Matters / approval of details.**

## **2. The Mayor's London Plan**

To conform to the meaning and intention of the Mayor's policy 3.6 and S 4 of the new draft plan CPL must:

- a.** Allow at least 10 sq. m of dedicated play per child, including all ages. 10 sq. m is a minimum. See SPG Children and young people's play and informal recreation 4.16
- b.** Use a more accurate calculation for child occupancy. Appendix 2 of the SPG, *Child Occupancy of New Housing Methodology*, gives one example based on interim figures worked out prior to the 2011 census figures. There are other more up to date methods of calculation.
- c.** Publish a strategy which shows where children of all ages from the development and the neighbourhood can play within the site and within sight of their homes.
- d.** Show the necessity of consigning children to off-site provision if there is one.
- e.** Prove that children in the neighbourhood who use play spaces in the parks around Convoys Wharf are not put at a disadvantage if off-site provision is shown to be necessary.
- f.** Consult with park users, including children and young people, and managers of the parks.
- g.** Put play areas in the public realm and avoid structural segregation.
- h.** Provide children and young people's social infrastructure, for example youth clubs or community centres and early year's centres.

## **3. Plot 15 and Play**

### **a. Structural Segregation**

Plot 15 is the second residential block which CPL have put forward an RMA. The first is Plot 08. Looking at the two together it becomes clear that CPL's policy of putting play space in the

resident's private communal space is segregating children. This tendency to separate play space for children in privately owned housing from children in affordable and social rented housing has come to public attention recently and is to be avoided. Children are social creatures and do not discriminate.

### **b. Proximity to home**

The proposals for Plot 15 continue the policy of sending children over 5 'off-site'. All children and young people need space near their homes. They feel more secure and their parents are more inclined to allow them to go out unaccompanied. If they have to go elsewhere to play it can lead to a feeling of rejection and isolation. If parents have to accompany the younger children over 5 years to a play space it decreases the ability of children to feel confident and have some degree of independence. In many cases they will not be able to and the children will be trapped at home, unable to reach the off-site play spaces.

The position of Plot 15 next to the bus route and main road through the site has the potential to create a barrier to children's free movement.

### **c. Design of Play Spaces**

i. It is important to involve children and their families in designing space to play from the beginning. They have ideas adults would never think of and the process helps to bring about social cohesion.

ii. The proposals for Plot 15 provide incidental play space more suitable for children over 5. The images in the Design Statement show this. Under 5's cannot normally do handstands.

iii. Children under 5 love to play with sand and water, to swing and slide. This could be included in the design.

iv. Consideration can be given to the needs of older children. They like to climb, take risks and kick a ball around for example. The upright posts which are intended to look like masts would benefit from some yardarms, ie horizontal posts on a mast that the older children can also climb. Provide hard surfaces such as concrete and asphalt for games such as tag and football.

## **4. The Bigger Picture**

It is essential to provide the space that children need. Play has declined over the last 20 years or so. During that period the incidence of child obesity, depression, self-harm, feelings of isolation and youth violence have increased. We are now at crisis point. The roots of this crisis begin in early years and is compounded by the lack of play. Play helps children to form the basis of physical skills, emotional resilience and sociability. The right context for play supports them in their healthy development. The built environment can give them this context.

Developers have the potential to help to improve the wellbeing of children and young people. Their ability to grow into healthy, productive and creative members of society begins with their ability to play. To deny them this opportunity through badly thought out strategies and design of play space and public realm, an overriding profit motive or even ignorance is to contribute to the unhappiness and distress of this coming generation.

## **5. Conclusion**

**Voice 4 Deptford** rely on LB Lewisham to hold CPL to account and ask that you refuse permission for the RMA for Plot 15 until the matters raised regarding children and young people have been remedied.

## **D) Culture and Heritage**

It is the opinion of **Voice 4 Deptford** that Reserved Matters Application **DC/19/111912** should be refused until CPL engages in a meaningful and ongoing dialogue with the local community about a Cultural Strategy for the site which reflects the needs, aspirations and heritages of the people of Deptford.

### **Background:**

A well run, informed and suitable Cultural Steering Group is the forum through which a meaningful and ongoing dialogue with the local community about culture on Convoys Wharf can take place. Convoys Properties Limited committed itself to set up such a group when, in 2015, it signed the S106 Agreement in conjunction with the GLA and L B Lewisham.

The Steering group, according to the S106 (p148, 6.3 (a)), is to '*assist in advising on the formulation, development and delivery*' of cultural strategies, to meet quarterly (S106 Agreement, 6.6, P 149) and, specifically, to deliver (S106 5.4) Annex 3 commitments which, amongst many other things, includes finding ways of attracting visitors to Deptford, encouraging starts ups, working with archives, establishing a Meanwhile Use programme which, crucially, includes setting up a Youth Forum and actively engaging with local people in the cultural sector and elsewhere in an ongoing way.

In addition, P 147, Section 5.5 of the S106 Agreement states that '*Before submitting the first Reserved Matters Application in respect of each Phase, the Owner shall consult the Cultural Steering Group and shall have regard to any representations received following such consultation...*'

### **What has happened to the Cultural Steering Group and Strategy?**

Since 2015 there has not been a fully functional Cultural Steering Group for Convoys Wharf. Nor has there been an agreed cultural strategy.

Instead of meeting quarterly since 2015 to help frame a cultural strategy for the site, and oversee its development, a scarcely functioning cultural steering group has met twice, once in January 2017 and a second time, 22 months later, in November 2018. On both occasions CPL presented it with a document called a 'cultural strategy' provided by Fourth Street consultancy, a 'fait accompli'. At no point since 2015 has CPL, or its agents, asked the steering group or the people of Deptford to engage with a possible cultural strategy. Deptford's opinions or ideas do not appear relevant.

At the second meeting of this scarcely functioning cultural steering group, *Secret Cinema* was presented to it as having done 'community research', as though CPL knew it needed to speak to local people yet decided instead to contract the task out to a commercial firm. No plans were set out for a Youth Forum, other Meanwhile uses, startups or archives etc. This second meeting broke down without agreement and there is no prospect of a further meeting of this group.

**Voice 4 Deptford** is aware that we are not alone in our criticisms of CPL regarding Sections 5.1-5.8 (Cultural Strategy); 6.1-6.10 (Cultural Steering Group); and Annex 3 (Cultural Strategy Commitments) of the S106 agreement. In a letter to Jonathan Sarfaty (Chief Project Manager, HPG UK) of 8<sup>th</sup> June 2017, Julia Robins, (L.B. Lewisham Major Applications Manager) the L B Lewisham, rejected CPL's Initial Cultural Strategy because it raised serious

concerns about *'the way the local community is going to be involved in influencing and owning what takes place across the Convoys Wharf scheme'*. The letter goes on to state: *'to ensure that the intended inclusivity is realised, officers need to understand how the core intentions of the Strategy will be delivered in practice and how much opportunity for genuine local engagement there will be'*.

For example, the letter continues, in Annex 3, there is a clear commitment to develop a *'meanwhile programme of temporary uses'* informed by *'a forum for receiving ideas and proposals that appeal to the community'*; and to *'create a youth forum to explore ideas of how young people can get involved in their neighbourhood'*.

### **Comments on Block 15:**

Block 15 presented CPL with an opportunity to rectify the mistakes of the RMAs for Plot 08 and 22 which are 'on hold' pending the establishment of a cultural steering group amongst other things. Unfortunately Block 15 has also been submitted without *'... consult(ing) the Cultural Steering Group...'* (p147, Section 5.5 of the S106), a serious error of judgement.

Despite what the company should have learnt from the delays it appears that they, and they agents, are either muddled, have not read the S106 p 147-149 and Annex 5 p 161/2 or think that they can ignore it or bludgeon local people into accepting their extremely reductionist idea of culture.

Assuming the best of all parties, an example of a muddle can be seen in the recent 'Exhibition', arranged by the consultancy *Quattro* on behalf of CPL (28th February and Saturday 2nd March, Deptford 2000 Community Action 199-201 Grove St, London SE8 3PG). On one board (supposedly) on display it stated that *a 'cultural strategy has been developed in conjunction with local arts groups and organisations'*. Yet the document shown in November 2018 to the scarcely functioning Cultural Steering Group had been done entirely by *Fourth Street*, the consultancy, without, to our knowledge or evidence, any contact with local groups. Combine this with Block 15's Planning Statement which says (Appendix 1 Conditions discharged through P15 Submission, p 47 Cultural Strategy (Ref. CW015) that a cultural strategy has been prepared by *FutureCity*, a different consultancy, and it is clear that in this case CPL is relying on a document drawn up before the S106 Agreement was signed in 2015. In other words CPL is muddling old data through two different agencies without seeking the guiding hand of the (non-functioning) Cultural Steering Group.

### **To summarise:**

The CPL's approach to the Cultural Steering Group and Cultural Strategy is either ignorant or arrogant and dismissive. There has been a general deficiency in the process of community engagement, sustained failure of consultation with local people so that they can influence 'the formulation, development and delivery' of a Cultural Strategy for Convoys Wharf. What could happen?

**Voice 4 Deptford** would fully support any actions LB Lewisham might take to force CPL to fulfil its obligations under the S.106 Agreement of 2015, including taking out an injunction against CPL until it honours its S106 commitments. This could ensure that a community agreed Cultural Strategy was put in place for Phase 1, Block 15.

*Planning Obligations (Section 106 Agreements)....are legally enforceable obligations entered into under section 106 of the Town and Country Planning Act 1990 (as amended).*

A House of Commons: Briefing Paper (House of Commons Library, Number 7200, 24 May 2016) states:

*If the s106 is not complied with, it is enforceable against the person that entered into the obligation and any subsequent owner. The S106 can be enforced by injunction. Local Government Association: <https://www.local.gov.uk/pas/pas-topics/infrastructure/s106-obligations>.*

Aside from any legal recourse which may, or may not, be taken by L B Lewisham, what **Voice 4 Deptford** finds incomprehensible is CPL's astonishing lack of vision and ambition for their magnificent site on the river Thames. Convoys Wharf has the potential to be a world heritage site, an approach recently produced in a paper by Richard Katona (see Appendix). Other local groups have visionary ideas as well which need to be explored. No one from CPL, or their agencies, have recently asked the local people of Deptford what they want because all seem happier to deal with us at one remove. In which case you might imagine that CPL would welcome a fully functioning Cultural Steering Group which took on the task of filtering local opinion as they assisted '*in advising on the formulation, development and delivery*' of a living, reactive, cultural strategy for Convoys Wharf.

**To conclude: Voice 4 Deptford** will continue to object to the RMAs for every block until CPL has established a well run, informed and lively cultural steering group to assist with the formulation, development and delivery of a cultural strategy for Convoys Wharf as it promised to do when it signed the S106 Agreement in 2015.

## **E. Financial Viability**

All Financial Viability Studies relating to Convoys Wharf are secret. Despite EIA's to both the London Borough of Lewisham and the GLA **Voice 4 Deptford** has been unable to see a copy of the original FVS in unredacted form. **Voice 4 Deptford** requested an unredacted copy of the FVS – with relevant details that inform Plot 15.

The Mayor of London has stated that FVS should be made available in their entirety to the public. Furthermore, in the case of Royal Borough of Greenwich Ruling 30 January 2015 the judge said, point 18.

- 1. We find it particularly hard to accept that the pricing and other assumptions embedded in a viability appraisal are none of the public's business. They are the central facts determining the difference between viability and non-viability. Public understanding of the issues fails at the starting line if such information is concealed, and discussion of the "point in time" nature of the viability models is frustrated.*
- 2. Voice 4 Deptford criticises Convoys Properties Limited, the GLA and the London Borough of Lewisham for their lack of financial transparency.*

**Voice 4 Deptford** believe it is discriminatory and unjust for the developers, the London Borough of Lewisham and the GLA to keep secret all the information in the Financial Viability Studies. How can we comment on the financial viability of the proposed Plot 15 if we have not seen the unredacted financial viability report? This undermines any 'consultation' process.

**The Unredacted Financial Viability Statement of 20 November 2013 concludes the scheme is not financially viable**, "we conclude that the Master plan 2013 scheme falls short of being viable by normal measures" (point 19.2). If you have carried out the review noted in the S106 this will be self-evident. **Voice 4 Deptford request a review of financial viability and a new Financial Viability Statement according to the process set out in S 106 Fifth Schedule Affordable Housing Review Mechanism.**

## **F. Comment on the Reconciliation Document**

### **1. The reason for the Reconciliation Document is:**

To enable the Council to be satisfied that detailed proposals for part of the site are consistent with the outline proposals for the site as a whole, as established by the Development Specification (February 2014) and Parameter Plans and to ensure that the development on each Plot, Phase or Sub-Phase makes a positive contribution towards the delivery of the comprehensive and integrated masterplan for the site as a whole.

There are a number of changes following from the RMA for Plot 15 which require more detail than the Reconciliation Document for Plot 15 has given. For example, there was originally a cinema planned for this block. Where will this now be placed? Plot 15 contains affordable and social rented housing. How does that affect the placing and building of other affordable and social rented housing on site?

### **2. Conclusion**

Voice 4 Deptford concludes: As with Plot 08 and Plot 22, there is insufficient detail as required by Paragraph 8 Reconciliation Document in the OPP.

We ask LB Lewisham that consent to the RMA is withheld unless CPL shows how the proposals for Plot 15 are 'consistent with the overall proposals for the site, as established by the Development Specification CW05A (February 2014) and Parameter Plans (as approved under Condition 2) before' in detail.

## SECTION THREE

### Why Voice 4 Deptford rejects application DC/19/111912 (Phase 1).

**Voice 4 Deptford** value LB Lewisham's attempts to bring forward affordable housing with some social rented housing in the Plot 15 while holding back consideration of RMA's for Plots 08 and 22. There are certain improvements in Plot 15 over Plot 08, which show it is possible to create better design with human scale architecture, a different approach to play and bringing in passive house features. It emphasises the point that Plot 08 needs a radical rethink, as does the whole development. Since sending our comments on Plots 08 and 22, the need to deal with climate change and the natural environment, the changing economic climate and the plight of children and young people has become much more urgent.

In the view of **Voice 4 Deptford** it is not in the public interest to deliver 3,500 homes that are unaffordable to the majority of people including nurses, doctors, firemen, other professionals and some at management level. In our estimation even the affordable currently set at 15% of the development require a household income of approximately £45,000, well above the means of most of Deptford's current inhabitants.

In addition there will be no social rented homes as we define it. This means that the younger generation of Deptford's local families will be forced to leave the area and, thereby, our area's unique mix of people and heritages will be destroyed.

In the view of **Voice 4 Deptford** it is also not in the public interest to build luxury units which take very little account of the acknowledged needs of children and young people. Research points to their need for play area near to home, space to roam and access to mature natural environments. Podium play areas and gated yards are unsuitable for play even for the children of the wealthy.

**Voice 4 Deptford** believes that we are at a turning point in public attitude to housing developments of this kind. The recent economic downturn and the known needs of the local community weigh against it as it is currently framed. It is in the developers' interests, as well as the public's, that they release their financial information, listen to the local community and start all over again.

The proposed development by reason of its projected appearance, size and shape of the properties, design, materials, height and massing would have an unacceptably adverse impact on the immediate vicinity particularly facing properties immediately adjacent to the site and the surrounding area by reason of overlooking, noise, loss of privacy, traffic, parking and access problems. The developer has failed significantly to address the following areas ;

- **Lack of consultation** and engagement with the local community.
- **Misleading** information pertaining to the proposal for housing for social rent.
- **Non-functioning** Cultural Steering Group.
- **Insufficient** consideration given to shared community space for children and young people.
- **Absence** of a promised co-produced Cultural Strategy.
- **Inadequate** attention to Deptford's unique historical and cultural heritage.
- **Limited** ecological and environmental merit.
- **Need to** consult with the Sayes Court Garden project on the heritage asset of the former John Evelyn land and Sayes Court Palace.
- **Dickensian** social class housing segregation.

- **Secrecy** relating to the availability of Financial Viability Studies.
- **No** indication that local residents will have access to any onsite new commercial and business opportunities.
- **Inappropriate** responses to projected increased traffic with its additional pollution.
- **Failure** to meet the need for family homes.
- **No** attempt to integrate with the existing community instead creating a new separate gated community.
- **Too little** reserved Disability car parking spaces.
- **Out of character** design of the development, its scale and use, is such that it appears markedly different to its surroundings.
- **No** consultation with local people and groups on 'meanwhile' uses.
- **Lack of clarity** concerning number of on-site employees working on the development.
- **Adverse impact** of the development on road safety.
- **Poor** choice of materials, design and shape of the proposed properties.
- **No** discussion with Deptford residents on 'naming' of areas or streets.
- **Overshadowing** with the height and proximity of the development causing an unreasonable reduction in sunlight.

Please take this as notice that a representative from Voice 4 Deptford would like to speak at any Planning Committee at which the Plot 15 application is considered. Please inform us as soon as possible the date of any such meeting.

Please note that our submission is in respect of the proposed development. While we have taken every effort to present accurate information for your consideration, as we are not a decision maker or statutory consultee, we cannot accept any responsibility for unintentional errors or omissions and you should satisfy yourselves on any facts before reaching your decision.

## **APPENDIX**

### **CONCEPT PAPER:**

#### **SAYES COURT GARDENS AND THE LENOX**

##### **Heritage projects and their place on the Convoys Wharf development**

by Richard Katona

### **SUMMARY**

Deptford's heritage has frequently been ignored but the Convoy's Wharf development raises the interesting opportunity of creating a 'heritage vicinity' that includes the sites of the Lenox and the Sayes Court Garden projects as assets of World historical importance linked and surrounded by a buffer zone along the lines recommended by the UNESCO World Heritage Committee.

(NB: Superscript numbers in the text relate to endnotes)

### **INTRODUCTION**

Deptford has been ill-served by the concept of heritage. Perhaps it reveals a truth that we do not care to acknowledge: that heritage is not a socially neutral concept; that those communities that preserve their heritage best are those with higher-status populations, those with the lower-status populations being more likely to find their valued heritage assets figuratively, and sometimes literally, bulldozed overnight.

The town of Deptford entered the modern era with four sites of world historical importance:

1. King Henry VIII's Royal Dockyard (1513);
2. The Royal Victoria Victualling Yard (circa 1650);
3. The Sayes Court Manor of writer, thinker, horticulturist and diarist John Evelyn (1620-1706);
4. Sebastian de Ferranti's 'Deptford Light' – the world's first central high-voltage power station (1889)

In their differing ways these were all potential World heritage assets, noted as sites of innovation in their respective fields, yet all were to be lost, whether through neglect or demolition.<sup>i</sup>

Neighbouring, higher-status Greenwich enjoyed better outcomes.<sup>ii</sup>

### **THE CONCEPT**

The concept is the establishment of a public realm vicinity at the western end of the Convoys Wharf development as a heritage site of world historical significance whether that be through local, national or international zoning/listing. This vicinity is already earmarked for two not-for-profit, heritage projects: 'Build the Lenox' and 'Sayes Court Garden'.

I suggest that this concept also include the establishment of a heritage site buffer zone<sup>iii</sup> between and around these two projects.

We are apt to forget that this Dockyard and Garden are of global heritage concern; there are enthusiasts on the other side of the World who probably know as much, or more, about them as we do and developments can be of wider concern than locals often realise.

## **THE HERITAGE PROJECTS**

### **The Lenox Project**

Founded in 2011, the Lenox Project 'is a charity that intends to build and launch a full-size replica of the Lenox, a state-of-the-art, naval ship that was built in 1678 in Deptford'.<sup>iv</sup> The aim is to re-build HMS Lenox at Convoys Wharf, the modern site of the historic Naval Dockyard in which the original was built.

The charity sees this project as having wider, heritage-led objectives that would include awareness-raising of the site's history, the promotion of educational, employment and apprenticeship opportunities, the establishment of a centre of excellence for historic shipbuilding and restoration and the launching and sailing of 'the Lenox to support a future programme of sail training'.<sup>v</sup>

### **Sayes Court Garden Project**

The Convoys Wharf site also occupies the larger part of an important, experimental 17<sup>th</sup> Century garden, famous in its day, laid out by the diarist and horticulturalist, John Evelyn FRS (1620-1706). A fragment of this garden still exists as a public park adjacent to Convoys Wharf.<sup>vi</sup>

In the late Nineteenth Century John Evelyn's descendants wished to avert the loss of the Garden (threatened as it was by urban settlement) by gifting it to the nation. This directly inspired the setting up of the National Trust but too late to protect Sayes Court Garden itself.<sup>vii</sup>

Rather than reconstructing the 17<sup>th</sup> Century garden, the project aims to re-imagine it. The project believes that the development of the site brings 'the opportunity to reclaim this land for the public, to create an experimental 21<sup>st</sup> Century garden and a cutting edge building to act as a centre of research, education and enterprise.

'This project has the power to help integrate the proposed new development into the local community as a place for everyone - bringing education, jobs and training as well as a place.'<sup>viii</sup>

### **The Convoys Wharf Context**

Both the above projects have already been 'pencilled in' (as it were) to the western side of the Convoys Wharf site.

Their locations are not contiguous but are closely neighbouring and share the following, common features:

- Both projects conceive of themselves as being not-for-profit, community-led and heritage-focused endeavours.
- Both projects relate to an important historical period in national development, namely the 17<sup>th</sup> Century, one being horticultural and the other industrial, yet within the same heritage 'footprint'.
- Both projects articulate a specific uniqueness: Evelyn's work at Sayes Court and his publications in horticulture, woodland management and urban air quality were not being replicated elsewhere at the time and are recognised as classics to this day; when the Grand Embassy of Tsar Peter the Great visited Deptford in 1668 it was because the Dockyard was already an acknowledged, worldwide leader in the scientific theory and practice of shipbuilding.

It is true that little evidence of all this remains above ground.<sup>ix</sup> Nevertheless these are both important heritage sites in the fullest meaning of that term.

## HISTORY AND THE HERITAGE CYCLE

History and heritage may be related concepts but the words are not synonyms. One would hope that the study of history would, at all times, be both forensic and evidence-led. Heritage, on the other hand, is usually celebratory in some sense or other.

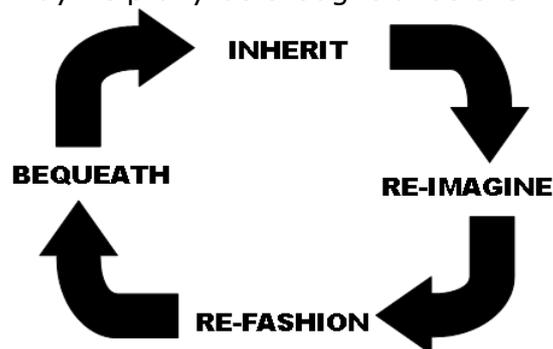
We may say that history is about the past; heritage is about the present and the future.<sup>x</sup>

In unpublished work that I undertook with Deptford Neighbourhood Action (DNA) as part of developing a Neighbourhood Plan, I conceived of there being a 'Heritage Cycle' as follows:<sup>xi</sup>

Heritage [...] refers to any meaningful cultural activity or entity that is:

- a. inherited from the past,
- b. re-imagined and re-fashioned in the present, and
- c. bequeathed to the future.

This may helpfully be thought of as the Heritage Cycle:



The idea of this was to demonstrate that heritage is something we contribute to, as much as receive.

The relevance of this concept to the Convoys Wharf heritage projects is that the lack of continuity and above-ground buildings and artefacts does not imply a loss of heritage status. Rather, it means that what we have inherited may be sparse and all but lost, but that we can breathe some significance back into it before it is gone for ever. Heritage sites may (and often do) require some repair.

## FURTHER OBSERVATIONS

This is a concept paper not a blueprint, but I would add some further observations.

In a recent meeting with representatives from the developers<sup>xii</sup> I did press them about the maintenance of aesthetic and architectural coherence across the site, with different architects and organisations responsible for different aspects. I was assured this process had been undertaken.

Yet I later found that the two not-for-profit projects, Sayes Court and Lenox, have not been included in the process, even though they are most certainly organisations<sup>xiii</sup> potentially operational on the site, as much as any architectural practice, and bring to the table highly challenging design considerations.

Just one simple point: any design that ignores aesthetic and architectural coherence with the masts of the Lenox is surely a non-starter.

Since the developer already recognises that aesthetic and architectural coherence as a priority, I do not think it would be too much of a stretch to insist there be a buffer zone (in the manner of UNESCO world heritage sites) between the two heritage-led projects. This seems wholly appropriate in order to ensure an experiential relationship one with the other and a coherence that makes sense to the visitor.

Perhaps a wider buffer zone could also be considered to ensure that the inner heritage zone not be hemmed in by isolating baffles, urban cliffs and blockages.

I accept that this could cause architectural challenges, but architectural challenges, surely, are what architects are supposed to meet, especially when confronting difficult, historic sites; and it surely was been recognised, from the very beginning, that this is a difficult, historic site.

## **STAKEHOLDERS**

I have begun to identify the more obvious interested parties in this concept if it is to be taken forward. Obviously, these would include local community groups that have an interest in heritage and heritage planning (for example, such a list might be the Lenox Project, the Sayes Court Garden project, Deptford Folk, Deptford Neighbourhood Action, Voice for Deptford, The Deptford Society, Friends of Sayes Court Park), as well as the Local Authority the Developers themselves.

If an ultimate aim were to create a World Heritage site, we would need to involve and seek guidance from the UNESCO World Heritage Committee.<sup>xiv</sup> We would not be able to nominate to them directly; only nation states can do that, and nominations need to be taken from a nation's 'tentative list'. The UK 'tentative list' comes under the aegis of the Department for Digital Culture, Media and Sport (specifically, the Parliamentary Under Secretary for the Arts, Heritage and Tourism) and seem to have been updated last in 2015.<sup>xv</sup>

Interested official parties would be Historic England, English Heritage (a charity) and Lewisham Borough heritage people.

We could begin contacting all these parties and should be seeking the best intermediaries for making contact with them. I have could immediately go out to consultation with the Lenox and Sayes Court projects as well as DNA (where I am heritage-lead on the Steering Group) and possibly Deptford Folk. I have no contacts in any of the other bodies listed above although we may know of people who are better connected with them.

## ENDNOTES

- <sup>i</sup> This paragraph comes from an unpublished contribution that I made to the Deptford Neighbourhood Plan through Deptford Neighbourhood Action (DNA), which is the recognised Neighbourhood Forum responsible for producing a local Neighbourhood Plan under the terms of the Localism Act 2012.
- <sup>ii</sup> The criteria listed by UNESCO for the ‘Maritime Greenwich World Heritage Site’ seem not to include any specifically maritime associations.
- <sup>iii</sup> UNESCO designates ‘buffer zones’ around World Heritage Sites for fairly obvious reasons: *“the protection of the ‘surroundings’ of the inscribed properties was considered an essential component of the conservation strategy, for cultural and natural sites alike”*. Martin O & Piatti G (Ed) (2009): ‘World Heritage Paper 25 - World Heritage and Buffer Zones — International Expert Meeting on World Heritage and Buffer Zones, Davos, Switzerland 11-14 March 2008’ : UNESCO, Paris.
- A pdf can be found at <https://whc.unesco.org/document/101967>.
- NB** The buffer zone of the Greenwich World Heritage Site even intrudes into parts of the London Borough of Lewisham.
- <sup>iv</sup> From the home page of the Lenox Project website (<http://www.buildthelenox.org/>).
- <sup>v</sup> *Ibid*. See the fuller list of the charity’s objects at <http://www.buildthelenox.org/>.
- <sup>vi</sup> A 34-minute talk by Francis Harris on the history and development of John Evelyn’s garden is to be found at [https://www.youtube.com/watch?time\\_continue=2028&v=oVUVVfWDBLO](https://www.youtube.com/watch?time_continue=2028&v=oVUVVfWDBLO). *“Frances Harris retired in 2010 as Head of Modern Historical Manuscripts at the British Library. She was curator of the Evelyn archive from the time of its acquisition by the Library in 1995 and co-curator of the exhibition, ‘The Writer in the Garden’ (2004-5). Her publications include: John Evelyn and his Milieu, co-edited with Michael Hunter (British Library, 2003), Transformations of Love: the Friendship of John Evelyn and Margaret Godolphin (Oxford University Press, 2004) and ‘John Evelyn and Wotton’, in A Celebration of John Evelyn: Proceedings of a Conference to Mark the Tercentenary of his Death, ed. Mavis Batey (Surrey Gardens Trust, 2007) A reproduction as delivered at ‘Rediscovering Elysium: John Evelyn’s Garden at Sayes Court’: Study Day of Sayes Court CIC, the Garden History Society and London Parks and Gardens Trust. Linnean Society, Burlington House, 25 April 2012”*
- <sup>vii</sup> Further information may be found on the Sayes Court project web site at <http://www.sayescourt.org.uk/index.html>. A complementary account is given on the Wikipedia Sayes Court entry at [https://en.wikipedia.org/wiki/Sayes\\_Court](https://en.wikipedia.org/wiki/Sayes_Court).
- <sup>viii</sup> An account of the projects aims and objectives is given on the home page at <https://sites.google.com/sayescourt.org.uk/sayes-court/home>.
- <sup>ix</sup> Below ground archaeology exists for both the Dockyard and Sayes Court Manor: see Francis, A (2017): ‘The Deptford Royal Dockyard and Manor of Sayes Court, London - Excavations 2000-2012’ Museum of London Archaeology Monograph 71 (London) *passim*.
- <sup>x</sup> In my work with Deptford Neighbourhood Action (DNA) I recently worked with a group of MA Urban Design students at the University of Westminster. They were undertaking a project on the public realm using Deptford as a study area. I raised with them this aphorism: ‘history is about the past; heritage is about the present and the future’. The course tutor warmly endorsed this view and advised her students to make a note of it since, she said, it would be of value to them in one of their assessed essays.
- <sup>xi</sup> This comes from an unpublished Deptford Neighbourhood Action (DNA) document that I wrote in April 2017: “Draft Heritage Policy version 3.2”.
- <sup>xii</sup> Meeting of 14 February 2019 between Deptford Neighbourhood Action (DNA), AR Urbanism, Hutchison Whampoa and Quatro regarding DNA’s Design Codes project.
- <sup>xiii</sup> The Lenox Project is a registered charity. The Sayes Court Garden project is a community interest company that is planning to convert to a registered charity.
- <sup>xiv</sup> For UNESCO World Heritage criteria, see <https://whc.unesco.org/en/criteria/> . There is also guidance for heritage sites deemed to be ‘in danger’: <https://whc.unesco.org/en/158/>
- <sup>xv</sup> See <https://www.gov.uk/government/news/eleven-potential-world-heritage-sites-make-up-uk-shortlist>