

**To David Robinson and Viv Evans,
LBL Lewisham Planning Department**

V4D comments on Convoys Wharf Reserved Matters Reapplication, Phase 1, Plots 08, 15 and 22 for London Borough of Lewisham

Voice4Deptford sees little material difference in the revised documents submitted by CPL this month (February 2020) for approval by the Strategic Planning Committee and certainly nothing has changed to affect our previous concerns. In fact events of the last year only serve to strengthen our arguments.

Voice4Deptford (V4D) wish to add the following comments.

Environmental considerations

In May 2019 the UK government declared a climate emergency. They have also set a legal target of net zero carbon emissions by 2050. The Mayor of London Sadiq Khan has also pledged to make London carbon neutral by 2050 and in February 2020 has announced his New Green Deal for London. It is time to take environmental concerns seriously and look again at the consequences for the environment of CPL's proposals.

For example,

CPL, as we wrote in V4D's previous comments, the RMA documents argue against the use of alternative technology, for questionable reasons, including connecting up to SELCHP, opting for the use of gas boilers. It is likely that there will be a ban on these boilers and other use of fossil fuels in the next few years. It is time to stop the use of fossil fuels now.

The sourcing of the constituents of concrete brings about environmental degradation. For example sand is becoming more difficult to acquire sustainably. The production of concrete brings about high carbon emissions. It is time to think again about the materials and their sources.

Conclusion

These RMAs should be rejected and the whole development reconsidered on environmental concerns.

These concerns alone should be enough reason to look again at the proposals in the RMAs. However there are other equally serious concerns.

Housing crisis

The acute housing crisis is getting worse and has risen up the political agenda. CPL is not meeting the present housing need. Social and genuinely affordable housing must be built from the start, that is, including Plot 08. There is a surplus of the kind of housing proposed by CPL. This is likely to become more acute as companies and banks such as HSBC continue to move their operations out of London. It makes no sense to produce even more just to lie empty when families and young people cannot afford the prices demanded for these expensive, low grade flats.

Children, play and public space

Children's dedicated play space is a referred matter and according to the OPP should be provided in the early stages of the development.

There is insufficient designated play space to meet the minimum 10 sq.m. standard for children of all ages in relation to plots 08, 15 and 22 and within the development as a whole.

The Initial cultural strategy response statement for Plot 08 states on the subject of children's play: *There is **little scope** for incorporating children's play within the limited street frontage delivered as part of Plot P08 RMA. However, it is envisaged that **playable landscape features** will be*

integrated into the rain gardens proposed to the east of Plot P08 (to be delivered as part of Plot P14). This will form part of an informal and natural 'play-on-the-way' route that stretches along the Eastern Gateway, connecting through to the river.

CPL have not grasped:

- a. **playable landscape features**, while important, are not designated play areas for children
- b. children of all ages (ie up to the age of 18) will live in or around Plots 08 and 15 and 22
- c. children of all ages play within sight of their homes
- d. the proposals as they stand create structural segregation of children and their play and confine the children's ability to play freely. This becomes obvious when looking at the relationship between Plots 08 and 15
- e. routes to parks, school and other places children visit should be safe for independent movement and interesting. The presence of the bus route between plots 08 and 15 will limit children's mobility
- f. sending older children offsite to local parks reduces the space presently available for local children
- g. children's play is not an add-on because it's 'nice for children to run around and play' but that it is essential to give adequate provision for their health and well being.
- h. this is a question of their human rights. For children and young people, the rights to play, to gather and to participate in decisions that affect them are enshrined in the United Nations Convention on the Rights of the Child.

The **lack of scope** for incorporating children's play is the result of ignoring the inevitable presence of children in the development from the start. Firm action must be taken to remedy this.

Heritage

Brick does not in itself reflect the heritage of the Naval Dockyard or Deptford. It, along with stone, is the material primarily used in construction up to the mid 20th century and brick cladding is used in many developments around London and beyond. Some of these developments combine brick with a design which immediately gives the observer a connection to the heritage of the place, for example along the banks of the Thames east of Tower Bridge.

Plot 15 is said to be designed to be reflective of the buildings in the High Street in order to give a sense of continuation of the street into Convoys Wharf. The street diverts to the right at Plot 08 towards the river so does not maintain the existing visual link to the Thames from the High Street, breaking the sense of connectedness.

The design may be inspired in some way by Deptford High Street but it does not reflect the heritage of the dockyard. A reference to upright posts in the residents garden area of Plot 15 as being like the masts of ships is very tenuous and similar wooden posts can be found elsewhere. They are not reflecting any specific aspect of the heritage.

Similarly it takes a leap of imagination to see the proposed building on the jetty as looking like a ship - perhaps when the moon is full and the tide is high.

Therefore it is difficult if not impossible to see any real incorporation or reflection of the rich heritage and historic importance of this site. Relying on landscape features and public art is not sufficient.

Policy and legal requirements

V4D is relying on LB Lewisham Planning to uphold all the relevant policies and the legal requirements relating to the Outline Planning Permission (OPP) granted in March 2015.

It appears to V4D that the applicant Convoys Property Ltd (CPL), while giving the impression in the words they use that they are compliant, in reality are not fulfilling what the policies and OPP demand. We have described them in our comments and objections made previously on RMAs for Plots 08,15 and 22 in Convoys Wharf, which still stand (See links below)

Here are a few examples:

- Work within the law set out in the 1990 Town and Country Planning Act as amended and apply the two types of timing to each phase of the development. Otherwise applying the two types of timing to the development as a whole has the consequence that there are 13 years (of which 8 remain) within which to approve all reserved matters and the development must begin within two years from the date the final RMA is approved. That is, construction cannot begin until all the RMAs have been approved and there is a limit of thirteen years for this approval. To do otherwise is to subvert the purpose of the Act.
- Policies and rights concerning children and young people's play and recreation are not being respected, especially in applying the 10 sq.m minimum standard.
- A properly functioning Cultural Steering Group has not been established in the manner set out in the s106 agreement. Nor a Cultural Strategy approved in the manner set out in the s106 Agreement.

More detail and further examples can be found in our previous submissions by following these Links:

Plot 08

<https://voice4deptfordorg.files.wordpress.com/2018/09/v4dcommentsexecutivesummaryphase1plot08final.pdf>

<https://voice4deptfordorg.files.wordpress.com/2018/09/additionalcommentsplot08finalsept18.pdf>

<https://voice4deptfordorg.files.wordpress.com/2018/10/additionalcommentsphase-1-plot-08-finalpdf.pdf>

Plot 15

<https://voice4deptfordorg.files.wordpress.com/2019/08/v4d-plot15-master-may-29-final-draft.pdf>

Plot 22

<https://voice4deptfordorg.files.wordpress.com/2018/11/v4dcommentsphase1plot22-finalpdf.pdf>

<https://voice4deptfordorg.files.wordpress.com/2018/09/additionalcommentsphase-1-plot-22-final.pdf>

See summary and comments on the latest RMA revisions here:

<https://www.dropbox.com/sh/acoomek29ostc62/AABNQP0TLkkZN9QNb1eBD74da?dl=0>.

In our comments on the latest RMA revisions we offer a solution to unlocking the development to put to the developers. Though our proposal may seem radical, we ask you to give it careful consideration as it has the potential to transform the site and people's attitude to it.

Conclusions

V4D concludes that the present applications for approval of reserved matters on Plots 08,15 and 22 must be rejected.

Moreover, the proposals for the development of Convoys Wharf have been overtaken by events. Approaching five years since the approval of the master plan the world has changed dramatically, even more so since the previous applications for approval of the RMAs were made.

The Outline Permission is out of time both technically and in terms of what is now acceptable in a development such as this. The masterplan does not meet the needs of the time - for the environment and climate emergency, the housing crisis and the growing crisis in children's mental and physical health. It does not do justice to the heritage, culture and history of Deptford.

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On behalf of **Voice4Deptford**
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