

Voice4Deptford Comments Regarding Approval of Reserved Matters (landscaping) for Plot P15 (Phase 1) Reference DC/21/121852 19th May 2021

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A. Children and Young People's Informal Play and Recreation

1. London Plan 2021

To state the present London Plan policy position, the London Plan 2021 is now in force and has some weight in considering the proposals at Convoys Wharf for the landscaping. Some elements in Policy S4 Children and Young People's Informal Play and Recreation which were guidance in the previous Plan are now policy. The related Special Policy Guidance (SPG) will be updated. Where there are specific areas of inconsistency between parts of the SPG and the London Plan 2021, the London Plan takes precedence as the most up to date document and as this forms part of the development plan.

2. General context for providing spaces for children and young people's informal play and recreation (Policy S4).

V4D and the Alliance for Childhood wish to emphasise the following from the London Plan Policy S4:

B Development proposals for schemes that are likely to be used by children and young people should:

1) ***increase opportunities for play and informal recreation*** and enable children and young people to be independently mobile

The landscape proposals from CPG do not increase the opportunities for play for children over the age of 5.

Large residential developments such as Convoys Wharf should be able to provide good quality, accessible and adventurous play space for children of all ages and abilities. The points highlighted in (2) of Policy S4 show where the proposals fail.

2) for residential developments, incorporate good-quality, accessible play provision ***for all ages. At least 10 square metres*** of playspace should be provided per child that:

- a) ***provides a stimulating environment***
- b) can be accessed safely from the street by children and young people independently
- c) ***forms an integral part of the surrounding neighbourhood***
- d) incorporates trees and/or other forms of greenery
- e) ***is overlooked to enable passive surveillance***
- f) ***is not segregated by tenure***

5) ***not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand.*** Where published, a borough's play

and informal recreation strategy should be used to identify ongoing or future demand for play provision.

London Borough of Lewisham's Play Provision in the Borough does not meet the minimum 10 sq m play space per child. Therefore there is an ongoing demand for play provision. The proposals for Convoys Wharf will result in a loss of play space in the local area in that they are not providing the 10 sqm minimum space for all age groups.

The guidance for Policy S4 states:

5.4.4 There should be appropriate provision for different age groups, **including older children and teenagers**. Particular consideration should be given to consultation with children and young people in the design of new provision to understand their changing needs.

There should be formal areas allocated specifically for children and young people, not only incidental play in adult spaces, though it is important to also incorporate this into the overall development.

5.4.5 **Formal play provision should normally be made on-site** and provide **at least** 10 square metres per child to address child occupancy and play space requirements generated by a development proposal. Supplementary Planning Guidance will provide additional detail on the application of this benchmark and other implementation issues. Where development is to be phased, there should be an early implementation of play space.

5.4.6 Off-site provision, including the creation of new facilities or improvements to existing provision, secured by an appropriate financial contribution, **may be acceptable where it can be demonstrated that it addresses the needs of the development whilst continuing to meet the needs of existing residents**. This is likely to be more appropriate for the provision of play facilities for older children, who can travel further to access it, but should still usually be within 400 metres of the development and be accessible via a safe route from children's homes. Schools, school playing fields and other facilities can also provide an important contribution to play and informal recreation facilities and should be encouraged to allow community access to facilities out of hours.

Although LB Lewisham may benefit from the financial contribution of the developer, even in this time of tight budgets and cuts to services, this should not be at the expense of the health and well being of children and young people. A developer such as CPG must be held to fulfilling their obligations to provide adequate space for children and young people.

3. Plot 15 Landscape Proposals

Looking specifically at the proposals for the landscape around Plot 15, this is a relatively small area squeezed between the building and the high boundary wall. The poetic description does not hide the fact that a number of boulders and some scented plants, though in themselves attractive to children and an attempt at inclusion, are not sufficient for providing interesting or exciting children's play. They are features in an adult space where younger children can play. Older children are excluded by the lack of play space for them outside their own homes. On the other side, in the public realm, children are faced with the main access road through the side. Guidance in paragraph 5.4.3 of Policy S4 states that play provision should be integrated into the wider network and not severed from the rest of the neighbourhood by physical barriers such as main roads.

Looking at Plot 8 and Plot 15 together, it is clear that the decision to make the housing block on P8 which is wholly for private sale and on Plot 15 where there is affordable renting and shared ownership in separated parts of the building, there is segregation

taking place. This is reflected in the landscape by the way that children from the different blocks will be separated from each other. This is not the best experience to have at the start of life. Children will not be growing up in an environment which has diversity as its basis.

Moreover, the families that live in the 'affordable' housing are likely to be workers from health and social care, teachers, police and others who earn less than the £40,000 a year needed to afford to buy in Block 8. A high proportion of this group are from black African and Caribbean and other culturally diverse backgrounds so this means that there is also discrimination built into the system. This is not a healthy environment for children.

B. Connection with River

Cities around the world have started with water/River as the vital basis in the landscape. London is no exception with the River Thames, where it has been determined by 3 fundamental factors – invasion, trade and disembarkation, all of which apply to the Convoys Wharf site, Deptford, and are why it was historically chosen as the first Royal Naval Dockyard.

Being near water lifts the spirit giving a feeling of well-being and peace. With the environment offering, wild life, walks, Public space, democracy, a River is for everyone.

Yet the master plan of the OPP imposes a 'plan-led' regimented grid across this Riverside site – ignoring the angled Olympia warehouse built with a utilitarian purpose for shipbuilding. It imposes a stamp on an overall 'new' landscape that can be built anywhere and is not directly and intimately entwined with its River heritage and geography.

The site always had water ingress, with access and creeks, whether natural or man-made, as it lies on a meander of the Thames and being a flood plain. Elsewhere, for example, The Barbican, has a man-made lake as a water feature, using water diversion.

C. Carbon Footprint

1. Carbon reduction

The "Future Lewisham, Our Boroughs Recovery" report, has 4 key themes – a greener future, a healthy and well future, an economically sound future, a future we all have a part in.

Quote – "Our next steps will be our greenest yet, continuing our efforts to preserve our climate for future generations and ensuring everyone can enjoy the place we call home."

Convoys Wharf is a very large and key strategic site in Lewisham that intends to build out new homes the landscape with an intense CGS – concrete, glass, steel – that all have very high carbon emission processes both in manufacture and production and in their installation. To achieve a very highly dense and very high rise redevelopment that will greatly increase the carbon footprint in Lewisham from now in 2021 and onwards.

The Lewisham "Climate Emergency Action Plan" 2020, states that "society faces a climate and ecological crisis that is a legacy of a generation of inaction". One of 6 priorities is "Low carbon development: Secure low carbon buildings and infrastructure by borough planning". Together with a parallel ambition to be carbon neutral by 2030.

2. Biodiversity and nature

The design of the majority of the blocks in the master plan deliberately builds in and presents itself as a defensive structure for the new inhabitants, with 85% as private apartments.

The design in the landscape is to be enclosed courtyards – like medieval monasteries – with internal podium open space “only accessible to the residents”. Plot 15 is “crank-shaped”, located at the furthest interior edge away from the River on the site. Looking like it is deliberately placed as a “buffer” of affordable housing, against the existing social housing of the Sayes Court estate, and then acting to protect the 100% private interior apartments – like Plot 08.

Throughout in the landscape there is no opportunity for anything to be welcomed. Nothing natural or wild is wanted. No routes through to be bio-diverse and support habitants. There is nothing innovative and new that demonstrates modern sustainable design living intentions that integrate the built environment within the natural landscape.

D. Conclusion

Children in England are some of the unhappiest children in the world. They are being denied the space they need, both physically and emotional, to grow up in a healthy environment. Play is essential for children and young people’s development and wellbeing. Denying them the play which is their right under the UN Convention on the Rights of the Child is totally unacceptable. The present plans are an abuse of children and their rights.

The new London Plan highlights even more that this scheme for Convoys Wharf has been overtaken by events. It is time this developer woke up to this fact and took action to put something more relevant to the present needs into place. It can only be in their interest to do this.

The new Lewisham Local Plan, in draft, and the new Deptford Neighbourhood Plan, in draft, show that there is a way to achieve better outcomes for all.

Voice4Deptford is now calling on LB Lewisham to -

1. Reject these landscape proposals, to demand from the developer that they publish their landscape plans for the whole site and demonstrate how they are meeting the requirements of the new London Plan.
2. Instigate a wholesale review of the present plan for Convoys Wharf. The Outline Planning Consent is no longer relevant and can only result in losses in the short and longer terms. It should be made clear to the developer that a fundamental change is now necessary. It is in their power to make this change.

Malcolm Cadman
Chairman Voice4Deptford
malcolm@pepys.community

Marion Briggs
Voice4Deptford and Alliance for Childhood
marion@allianceforchildhood.org.uk

For Voice4Deptford and Alliance for Childhood