

## Additional Comments to London Borough of Lewisham on Reserved Matters Application DC/13/83358 Convoys Wharf, Block 22 (Phase 1)

**Voice 4 Deptford** makes these Additional Comments (20/09/2018) in response to the submission of the Application for approval of reserved matters for Plot 22. These Comments are to be looked at together with those we submitted on 8<sup>th</sup> August, 2018 and support our Comments on Plot 08 and the Comments of Deptford Neighbourhood Action.

The Planning Statement is numbered (CW-P22.03) DP4203. Rev A. and has been produced by DP9 Ltd.

We are pleased to see that CPL have submitted a revised Planning Statement, this time without reference to 'Elephant Park'. We are also glad more relevant detail is made available to us.

**Voice 4 Deptford** has a number of **General Comments (A)** to make about this application. They fall into the following categories.

1. Lack of Consultation
2. Traffic Management
3. Unsuitability of proposed new building on the jetty plus reconciliation document
4. Building's change of use
5. Cultural Strategy and Meanwhile Use

We also have a number of **Specific Comments (B)** about numbered aspects of the Planning Application.

### A. General Comments

#### 1. Lack of Consultation:

##### **P 19 The Planning Statement, Public Consultation**

**V4D** Comments that it is disappointing to see that CPL has repeated from Section 5 Consultation (paragraphs 5.5) and in the original Planning Statement (5.6) their assertion that public consultation on Plot 22 has been sufficient. This is not true. It has not been sufficient.

Furthermore, with this resubmission, an extra paragraph has appeared:

*5.7 The client and the project team will continue to engage with the local community to keep them up to date regarding the progress of the development.*

**V4D** Comments that this is an extremely optimistic assessment of the situation. There has been little, or no, engagement with the local community about the 'progress of the development'. How can something continue which has not yet started? And there has been no consultation with the local community about Plot 22 prior to the submission of the Reserved Matters Application. This is particularly serious when it comes to traffic for the residents of Watergate Street, New King Street and Prince Street, the change of use of the building and the cultural strategy.

#### 2. Traffic Management

**V4D** Comments that the lack of attention and consultation on the issue of traffic management ranges across a broad spectrum of documentation including the Planning and the Transport

Statements, Parts 1 and 2. It encompasses many different aspects from the proposed use of vehicles to tree management, parking, traffic flows and, unaccountably, a complete change of tack about which building CPL intends to build first in Phase 1.

**i) The movement of vehicles**

**The Planning Statement, Description of Development, Temporary Access Road (P15 4.11) and Construction Traffic (P 37 8.56) state:**

**4.11** *Vehicular access to the site is from Watergate Street and onto the temporary access road, with access to the secure car park and servicing on the eastern element of the site.*

*The Development proposes space for 30 temporary non-residential car parking spaces.*

*Pedestrians and the Cycling Network (8.43); Car parking (8.44); Servicing, Vehicular Access and Waste Vehicles (8.54) will all use this access road if the plans are approved in their present form.*

**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.*

**V4D** Comments that Point 4.11 speaks of light traffic, Point 8.56 speaks of construction traffic. Whilst light traffic is likely to cause considerable disruption to the residents of Watergate Street, construction traffic is likely to be even more disruptive. There is no statement about where the construction traffic could go.

**V4D** Comments that this absence of information is serious because there appears to have been little information given to the residents and businesses around Watergate Street, New King Street and Prince Street. What do they say about light traffic versus construction traffic? No one knows. We would like to see 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. 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.

In addition **V4D** Comments that the Code of Construction Practice is an important document which should be available now, rather than later, particularly as there has been such little consultation with the public. With a development of this size such information should be available before granting permission is considered, and particularly so when access to the site, in this case for Phase 1, Plot 22, is so constricted.

**ii) Tree Management**

Arboricultural Statement for example pages 5 -

3.2 Tree protection

3.2.1 Root protection areas and construction exclusion zones

**V4D** Comments that, for the sake of temporary access to a marketing suite, the trees next to the proposed road will suffer. Mitigating action proposed in the Arboricultural Statement would not be necessary if the temporary road and its use were not granted permission in the first place. There are other possibilities for access if the use as a public space with cafe/restaurant facilities were to go ahead. These are set out in the outline planning consent.

**iii) Parking and Marketing Events**

Transport Statements, Parts 1 and 2 – in summary:

In paragraphs 1.6.12, 1.6.13 and 1.9.16 it is proposed that during the interim stages of development 30 semi-permanent parking spaces will be provided for the Marketing Suite, split into two areas, with an additional area of overspill car parking for 70 cars to accommodate demand for specific marketing events, expected to be held once or twice per year. It is anticipated that these events would attract a maximum of 100 attendees. Based on the above assumptions, the Marketing Suite sales events are expected to result in three additional inbound vehicles accessing the site via Watergate Street and 17 additional inbound vehicles joining Watergate Street at the Prince Street / Watergate Street junction during the afternoon peak traffic, resulting in a total inbound flow of 9 and 48 vehicles on Watergate Street and Prince Street respectively.

**V4D Comments** that there is insufficient information to show the anticipated number of vehicles entering and leaving via the temporary access route on non-marketing event days. The estimates given appear to be a desktop calculation and the actual physical conditions of Watergate Street and Prince Street are not acknowledged. The estimates also appear ignorant of the narrowness of both streets and the present use of Prince Street as a 'rat run' for people avoiding congestion on Creek Road/Evelyn Street. Also that there are often parked cars on both streets narrowing the roads further; that there are two children's play areas and a pub where people and children are accessing, not to mention the residents in Watergate Street whose lives will be disrupted with traffic and noise.

**V4D** ask 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. It appears that not causing problems to traffic flow is a priority over the health, safety and well-being of local residents and visitors to the adventure playground and pub. Such lack of local knowledge could be remedied if CPL consulted local people as they claimed they have.

iv) Change of mind about which Plot is to be built first:

Transport Statement Summary and Conclusion 1.10.1

*The application seeks permission for the development of a permanent building comprising 800m<sup>2</sup> of floor space, to be used predominantly as a café/restaurant (land use class A3) as part of the end state development on Plot 22, with an initial use as a marketing suite in the interim period during construction phases of the wider scheme.*

**V4D** Comments that this Transport Statement makes it clear that Plot 22 is in fact the first plot that CPL wish to develop, taking precedence over Plot 08. This would further delay the start of the delivery of the housing stock.

To Summarise on Traffic: **Voice 4 Deptford** Comments that in proposing to create a temporary access route along Watergate Street there is a failure to take local conditions into account, lack of attention to detail on where different types of vehicles will go and when, carelessness of trees and the local environment and opaque plans about which building in Phase 1 is to be built first. This also gives a clear demonstration of CPL'S priorities: vehicles before people, parking above housing and marketing above both.

### 3. Unsuitability of the Proposed Building on the Jetty

**V4D** Comments that what was agreed in the OPP in 2015 about buildings on the Jetty has been completely reinterpreted by CPL to suit their commercial aims.

i) The Planning Statement, Design Matters P 28/29 states:

**8.16** *The Plot 22 Development has been designed in accordance with the parameters and principles of the OPP.*

**8.21** *There are no specific scale requirements for Plot 22 within the OPP, other than restricting the overall building size to be 800 sq. m*

**V4D** Comments that the parameters and principles of the OPP allow 800 sqm of Cafe/restaurant use allows for the building of more than one structure for Cafe/restaurant which use could be, for example, a number of food and drink kiosks in keeping with the character of Deptford High Street. To quote exactly what was stated in the Representation Hearing Report-3 para 316:

*In response to this issue [flooding], the applicant has stated that the buildings proposed on the jetty are intended to be light-weight, and could easily be removed or repaired in the event of flood situations. Furthermore, this part of the masterplan would be included within a detailed Flood Risk Alleviation Strategy (discussed in the environmental issues section of this report), which will be implemented to manage flood risk and ensure public safety.*

This text is given as a response to the Environment Agency's concern with this proposal (for a Jetty Park with retail use) '*for reasons associated with the proposed provision of inappropriate uses on a functional floodplain*' (Para. 315). What will happen in the event of a flood?

**V4D** Comments that the building now being proposed by CPL is described in the Heritage Statement as being a 'high-quality building with architectural merit'. This is a far cry from the '*food and drink kiosks in keeping with the character of Deptford High Street*' Whilst high quality buildings with architectural merit would be welcomed by **V4D** on the rest of the site, the jetty is not the place for it. What was proposed for that place was a public park. It seems extraordinary to us that CPL can have such a cavalier attitude to the planning process that they assume that a changed building is possible and that it can be achieved in this manner.

#### **4. Building's change of use**

Design and Access 1 Introduction states:

**1.1** *... the application seeks permission for the erection of a two storey stand alone building, within the 'sui generis use' of the masterplan. ...*

*... It is proposed that the building would initially be used for the sales and marketing of the apartments from the planned development buildings during the construction phase of the masterplan, as approved under the outline permission DC/13/83358 and then be converted at a later date to an A3 restaurant use.*

**V4D** Comments that this is a change of use from the A3 use granted in the Outline Planning Permission of 2015 to Sui Generis. It will also require planning permission for change of use back to A3 use. If CPL want such a building on the Jetty they must take the OPP off the table and replace it with another one. The idea of a permanent structure on the jetty, whatever its purpose, is completely new. It creates all sorts of knock on effects for local people, is in contradiction to the plans outlined in Point 3 above which speaks of multiple light weight buildings to minimise the risk of flood damage amongst other things.

**8.17** *The OPP has established fundamental design principles that have underpinned the Development and have been used to inform the plans and documents submitted for approval in the Plot 22 RMA. **The OPP does, however, incorporate flexibility into its parameters and principles to allow for architectural variety in the detailed design of the individual phases and plots.***

**V4D** Comments that what is good for the goose is good for the gander. The principle of 'flexibility' on which CPL bases this comment could equally apply elsewhere, beginning with the entire design Plot 08, its internal and external spaces and use as private dwellings.

## 5. Cultural Strategy and Meanwhile Use

**Voice 4 Deptford** Comments that the tenuous link of the proposed building to the local heritage and architectural vernacular of the area highlights the lack of a cultural strategy. Despite CPL's proposed plans on the jetty for a 'high-quality building with architectural merit', this RMA reveals an 'anywhere' appearance which could be helped by a cultural perspective which informs the whole site, its layout, landscape, style of buildings, memorials and usage. Thus far CPL has chosen not to seek such a strategy or put in place the requirements of the 10 March 2015 Section 106 Agreement which legally requires it. Vague notions of 'architectural merit' are the result.

**V4D** understands that what CPL considered to be a Cultural Strategy (Document - Convoys Wharf: Initial Cultural Strategy, April 2017, Fourth Street) has been rejected by L B Lewisham and we applaud the action. We also understand that L B Lewisham will not accept Comments about the content of that document at the present time. Despite this we take this opportunity to add our voice to Lewisham's discontent in the following unsolicited Comments. They are by no means comprehensive.

The Riverside Promenade Experience and the Jetty Park are listed as two of the Commitments in the Section 106 Cultural Strategy. Yet the current RMA for Plot 22, CPL denies the public access for a generation. Their proposal to build a marketing suite on the jetty means that local people have lost the imminent possibility of a public park on the waterfront with food stalls, seats, swings, picnic tables and loos, all of which appeared to be granted to us in the OPP of 2015.

Deptford and Greenwich are not in competition as far as heritage and culture are concerned. They are two sides of the same coin. Deptford's cultural contribution to a visit to London could easily complement the attractions of Greenwich if imagination, flair and ambition were employed in creating the right cultural strategy.

Deptford, its strand, archaeology, naval, shipbuilding and landscape heritage could bring people to Deptford from all over the world, not just up the road from Greenwich. It would be possible to create a cultural experience on the site which also reflects Deptford's current population. Its history and heritage would become an 'anchor' and inspiration for the present mixed heritage population. This could be a digital museum, a living museum, or a combination of the two. It would not only build from the past but towards the future.

The legacy of Octavia Hill is not just for the founding of the National Trust, but for the way she extended to open spaces, social housing, heritage and horticulture. V4D would like to see this legacy reflected in the development of the whole site, that is to have real open, green space and children's play space, include social housing, show a true respect for the heritage and continue the horticultural history.

The people of Deptford have fought and succeeded in bringing the anchor back to Deptford High Street. CPL could support the regeneration of the area by bringing back the Dockyard Clock, now in Thamesmead, and reinstalling it as part of their newly modelled public spaces.

It is time for Meanwhile Use to be initiated with the support of local groups e.g. Sayes Court CIC, Second Wave, Deptford Society, **V4D** and others. Young people particularly need to be

involved in all the consultations about Convoys Wharf, especially Meanwhile Use, as they will inherit the consequences of today's planning decisions.

Meanwhile activity on the site will create interest, bring visitors to the site, form a bridge to the local community and be as fruitful way of marketing the site as a marketing suite.

## B) Specific Comments:

Below please find **Voice 4 Deptford's** Comments on other specific aspects of the RMA (CW-P22.03) DP4203. Rev A which fall outside the five categories listed in Part A above.

### a. Planning Statement Summary and Conclusions 11.4

*The Development represents the second plot of the wider Convoys Wharf development, which will provide further regeneration benefits to the Convoys Wharf Opportunity Area and help deliver the regeneration objectives of the Council and the GLA for this strategic development site; V4D The benefit will be to CPL and its marketing strategy, not to the regeneration possibilities of Convoys Wharf*

*Provides high quality retail accommodation, which represents exemplary design;*  
**V4D** The application is not to provide retail accommodation. It is to provide a marketing suite. However exemplary, the design is not in context with the surrounding architecture.

*Provides a significant proportion of public open space, and opens up the site for the first time to allow residents and visitors to experience the River Thames from this location;*  
**V4D** The application does not provide public open space. The application is for private use by appointment only

• *Creates a high-quality connectivity;*  
**V4D** The application is for temporary access via Watergate Street, endangering protected trees, potentially damaging a protected wall and annoying the neighbours.

• *Enhances biodiversity and ecological value on site;*  
**3.15 Table 6** sets out the proposed area for bio-diverse habitat in Plot 22. It applies only to roof space of which there is none proposed in this application. Biodiversity is important and should be included in the assessment of the proposed public space.  
**V4D** The application as it stands has yet to demonstrate this. It does not bode well when the proposals include the need of mitigating steps to avoid damaging protected trees.

• *Creates a high-quality development of architectural interest that sets a precedent for future buildings in the wider Convoys Wharf development;*  
**V4D** The application is for a building that does not relate to the surrounding heritage and architecture. If this is a precedent and an indication of the designs to come, it is not acceptable. It is not sufficient that according to the Heritage Statement compiled by CgMs that this design '*...not only fits into the existing context of the jetty, but also makes reference to the historic industry that was the Royal dockyard, this due to its sleek, long lines that appear almost "shiplike"*'. This tenuous link to the heritage of the site is scarcely stronger than the use of brick cladding on Plot 08.

### b. Reconciliation Statement for Plot 22 submitted May 2018

1. As previously commented on, **V4D** found the RMA for Plot 08 wanting when looked at against the conditions outlined in the Reconciliation Statement (submitted February 2018). Similarly **V4D** Comments that Plot 22 is also short on detail, that is, there is not sufficient information according to the requirements in Section 8 Para 1 of the Planning Agreement, this time in relation to 1(ii) (a) The type and quantum of non-residential use(s) (m<sup>2</sup> Gross External Area); and (b) The amount (m<sup>2</sup>) of private residential amenity space, communal residential amenity space (including play space), publicly accessible open space and living roofs.

2. **V4D** Comments that CPL must provide more detail of how the RMA for Plot 22 affects the rest of the development of Phase 1 in these areas, what has been agreed and what is still to be agreed.

3. The Reconciliation Statement for Plot 22 submitted May 2018 says -

i. *Biodiversity 3.15 Table 6 sets out the proposed area for bio-diverse habitat in Plot 22 against the Development Specifications.*

**V4D** Comments that although there is no green roof specified for the building, the RMA included an area with protected trees. This forms part of the bio-diverse habitat of Plot 22 and Phase 1 and should be mentioned not least because the ecosystem of the trees is being destroyed and thereby biodiversity is diminished.

ii. *Overall Floorspace 4.2 Table 7 confirms that the total floorspace proposed in Plot 08 and Plot 22 complies with the Development Specification.*

**V4D** Comments that Table 7 does not specify how the proposed change of use affects the further development of Phase 1 and the delivery of a jetty park with its cultural use.

iii. *Land Use 4.3 Table 8 sets out the cumulative land use and quantum of floorspace proposed in Plot 08 and Plot 22 against the Development Specification.*

**V4D** Comments that Table 8 does not show how the new proposals affect the timing of the development of Phase 1. Does Plot 08 come before the development of Plot 22 or after?

## **Conclusion**

To summarise **Voice 4 Deptford** Comments that the proposed application has not been consulted on, the building on the jetty is a material change to the outline planning permission and should either be withdrawn or the whole OPP itself be withdrawn. The character of the building's proposed design is unsuitable for the sensitive historical site on Deptford Strand, its use has changed to a marketing suite (contrary to planning law which requires an application for Change of Use) and that the temporary access route would be disruptive to local residents, harmful to protected trees and is unnecessary if the change of use is denied. Finally the role of a Cultural Strategy Group in enabling a more appropriate use of the jetty has been ignored.

**Voice 4 Deptford** requests that this application for Reserved Matters for Phase 1, Plot 22 be turned down.

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