

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

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 18th 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."