Committee	STRATEGIC PLANNING COMMITTEE **(ADDENDUM)**
Report Title	PLOT 08, 15 and 22, CONVOYS WHARF, LONDON, SE8 3JH
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Reg. Nos. DC/18/107698
DC/18/107620
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1.0 INTRODUCTION

1.1 This report has been prepared as additional representations have been received since publication of the agenda. One representation in support of the application has been received from the operator of SELCHP, Veolia, two representations objecting to the application has been received from a member of the public and two additional objections have been received from Voice4Deptford and Alliance for Childhood.

2.0 SUMMARY OF ADDITIONAL RESPONSES

Representation in support of the application from Veolia

2.1 The representation received in support of the application from Veolia is summarised as follows:

- Veolia supports the applications as the proposed Convoys Wharf development has the potential to accommodate a District Heating Scheme from the South East London Combined Heat and Power (SELCHP) facility for which preliminary discussions have taken place with the Convoys Wharf Developers.
- The installation of a District Heating Network to Convoys Wharf in Lewisham would support residents as part of Lewisham's carbon neutrality plan and open up opportunities for potential splinter schemes in future. We are therefore supportive of this scheme and these applications to allow discussions to progress.

Public representations objecting to the application

2.2 The objections received is summarised as follows:

- **Heritage**
  - The developers show no real understanding of the historic significance of this site; although the naval dockyard at Deptford lacked Wren's architecture, nationally it was far more important than any site in Greenwich.
  - The literal reuse of timber on P08 misses the larger point.
  - The scheme is not context-sensitive. It does not seize the opportunity to convey historic Deptford's rich connections with the site – which would allow diverse populations to trace something of their heritage.
  - The site-wide 'heritage principles' are 'developing' and will be captured at a later stage – but by then options will be narrowed and the design of the main architectural interventions will be fixed. It will be too late for an imaginative design.

    - There is no substantial treatment of heritage in the proposals as they stand.
    - Their scheme makes no 'positive contribution to the local townscape
    - Consideration needs to be given to the obstruction of the view of the Master Shipwrights House from the river by the proposed building at P22
- **Surface Water** - Gallons of water being daily pumped from the site into Leeway. The water table on the site must be very high. Is the Council assured that surface water control measures are adequate?
- **Fire** - It is surprising that a scheme can be considered for approval before fire safety measures have been thoroughly explored and the results known, especially given recent fires in local blocks of flats. But modelling of the proposed system for Plot 08 is still being undertaken
- **Covid and social distancing** – We are told we will have to live with the virus – and doubtless there will be other pandemics. The proposed scheme is too dense to allow for social distancing. There are pinch points in the proposed scheme which won't permit adequate social distancing

Representation from Voice4Deptford

2.3 The representation received from Voice4Deptford was received as a 5 part representation covering the following topics:

1. General statement from Voice4Deptford
2. Objection to length of speaking time at SPC
3. Objections to P22
4. Objections to P08
5. Objections to P15

2.4 The general statement is summarised as follows:

- The OPP is out of time and no longer valid
- The OPP is out of date and needs updating to reflect modern requirements
- The proposals do not do justice for such an historic site of archaeological and cultural value

2.5 The objection in relation to the length of speaking time at SPC is summarised as follows:

- There is no justification for a 5 minute speaking rule
- The amount of time allocated to objectors to speak is insufficient and should be reviewed

2.6 The objection in relation to P22 is summarised as follows:

- There has been insufficient public consultation in relation to the proposals
- The design is not appropriate and would be almost impossible to keep cool during summer
- The use of glass means the building would be difficult to keep clean
- The use of the building as a marketing suite is not acceptable and prevents public access to the jetty

2.7 The objection in relation to P08 is summarised as follows:

- The application is out of date
- An imaginative and powerful cultural strategy could bring about a better and more site specific design
- The application was posted online with documents missing and hard copies were not made available
- The design should be more context specific
- The affordable housing offer is contrary to Lewisham's Core Strategy
- Children and young people's needs are not being met – inadequate intervisibility between them and their parents
- More greening required
- Cultural Steering Group obligations not being fulfilled

2.8 The objection in relation to P15 is summarised as follows:

- The plot would form part of the 'poor quarter' of the development
- The access route would make it noisier than anywhere else in the development
- The design has any 'anywhere' feel and the materials make it appear dark and looming
- Shared ownership is a form of private housing
- London Affordable Rent is not genuine affordable housing

Representation for Alliance for Childhood

2.9 The representation from Alliance for Childhood has been summarised as follows:

- The playspace provided is not sufficiently challenging for children
- The developers are relying on land off the application site for playspace provision
- Segregation by tenure is occurring across P15 and P08

3.0 CONSIDERATIONS

Representation from Veolia

3.1 The representation from Veolia is in support of the Reserved Matters Applications in respect of Plots 08, 15 and 22. Considerations in respect of sustainability are covered in the "Sustainability and Energy – condition 15" section of each report. The applicant is continuing to prioritise the connection with SELCHP and has evidenced that these discussions are taking place.

Objection received from the public

Heritage

3.2 The impacts of the proposals on heritage and the how the proposed design reflects the history and heritage of the site is discussed at length in each of the respective reports.

3.3 Following consultation responses in respect of the initial submissions for all three Reserved Matters Applications, the applicant entered a series of meetings with Historic England and Lewisham Planning Service in order to ensure the proposals better reflected the heritage of the site.

3.4 The outcome of this was the development of a Site Wide Heritage Principles document, designed to guide the Applicants design teams for P08, P15 and P22 as well as the design teams for future plots. Subsequently, the proposals were amended in light of this document in order to better reflect the heritage of the site. It is acknowledged that these principles are still being developed and the exact design reflections of heritage are yet to be fully developed – as such, the applications are recommended for approval with a condition requiring full details of the design response to heritage assets to be provided prior to commencement. This approach is considered acceptable by Historic England and the Planning Services Conservation Officer and that approval of the Reserved Matters Applications would hinder the reflection of the heritage of the site through design.

3.5 It is also worth noting that condition 42 of the Outline Planning Permission requires details of public open space and landscaping to be submitted to and approved by the Local Planning Authority prior to commencement of development. This condition has not been sought for discharge as part of the Reserved Matters Applications and offers a further degree of control over how the design reflects the heritage of the site.

3.6 In relation to the views of the Master Shipwrights House being obscured by the proposed building at Plot 22, this has been considered in the respective officer's recommendation to committee.

3.7 Officers consider that the proposed location of the building at P22 would result in minimal obscuring of this building from only very oblique angles on the river and that it would not impact or alter the setting of the building. In the long term, the Jetty building would be viewed in context of Plot 01, and in the short to medium term would only be partially visible from, given the contemporary form, lightweight appearance it is not considered that that there would be harm to the setting of the Master Shipwrights building. Additionally, Historic England have raised no objections in this regard.

Surface Water

3.8 The applicant and Council are aware of water discharge from the development site into Leeway. This has been investigated by the Environment Agency and the applicant and is believed to be tidal related – investigations continue in order to find a solution.

3.9 Drainage, Flood Risk and Surface Water are controlled by condition 19 "Drainage and Flood Risk" and condition 47 "Surface Water Control Measures". These conditions are both recommended for discharge in relation to Plot 08 and condition 19 is recommended for discharge in relation to Plot 15.

3.10 With regard to surface water specifically, each of the Reserved Matters Applications has been reviewed by the Environment Agency and the Lead Local Flood Risk Authority who have found the applications acceptable in this regard. Further details in relation to drainage are required in relation to Plot 15 (condition 47) and Plot 22 (conditions 19 and 47) – these will be forthcoming as part of future discharge of conditions applications and will be assessed accordingly by the Lead Local Flood Risk Authority and the Environment Agency.

Fire

3.11 This is addressed in paragraphs 8.310 to 8.315 of the Plot 08 report. The proposed development will be required to meet the relevant building control standards in

relation to fire safety. Additionally, the London Fire and Emergency Authority were consulted on this application and raised no objections to the proposals.

Covid and Social Distancing

3.12 Officers have reviewed the proposals in light of the Covid pandemic and are satisfied that the proposed public realm is maximised within the OPP parameters. Footpath widths will typically be generous at circa 5-8m but will increase to 11m in certain areas and decrease to 3m at certain pinch points where street furniture such as lampposts are located. The full details of public open space and landscaping are required by condition 42 of the OPP which does not form part of this recommendation for approval.

Objection received from Voice4Deptford

3.13 Responses to the additional objections received from Voice4Deptford are addressed in turn below. It is noted the objections are similar to those already received in relation to public consultation in respect of the 3 Reserved Matters Applications and have been addressed in the respective officer reports.

General objection

3.14 The general objection repeats points with regard to the 'timing out' of the Outline Planning Permission. This is covered at length in the Executive Summary. The Planning Service are satisfied that the application has not timed out – this has been the opinion of the Council's lawyers, external legal advice and the GLA legal team.

3.15 Objections in relation to the application needed updated are noted, however a valid OPP is in place. The proposed developments at Plots 22, 08 and 15 have been designed to modern standards.

3.16 Officers are satisfied that the proposed designs are of a high quality overall and that they adequately reflect the heritage of the site in the context of their locations within the development. A condition has been recommended to Plot 08 and 15 to require full details of design reflections of heritage prior to commencement of development. This approach is supported by Historic England.

Objection to speaking time at SPC

3.17 The speaking time for objectors and supporters of each application is a matter for the chair of the Strategic Planning Committee to decide. Officers note that the allocated time of 5 minutes per application is the same for both those wishing to object to and support the applications.

Objection to Plot 22

3.18 The approach to consultation is outlined in Part 6 of the officer's report to committee.

3.19 Officers are supportive of the lightweight glazed design and it is considered appropriate for this location within the development site. The assessment of design is detailed in the officer's report to committee.

3.20 The use of Plot 22 as a Marketing Suite does not form part of this application – if the applicant wishes to pursue the use of Plot 22 as a Marketing Suite, this would require planning permission in its own right. This application would be determined on its own

merits upon submission. Officers note that the OPP requires the land at Plot 22 to be "publicly accessible open land".

Objection to Plot 08

3.21 Officers recognise the importance of a Cultural Strategy in shaping the Convoys Wharf development. It is noted that the Initial Cultural Strategy is an evolving document and must be agreed with the Council at latest, prior to the occupation of 250 units, as required by the S106 provisions. The document will continue to evolve through community consultation which would be overseen through the Cultural Steering Group (CSG).

3.22 As noted above, since the first meeting of the CSG in January 2017, there has only been one further meeting on December 2018, which is contrary to the requirements of the S106 agreement, which require the group to meet at least quarterly. Accordingly, the Council have advised that this is unacceptable and contrary to the requirements of the S106

3.23 The Council is working with the applicant to agree how this process can be recommenced and inform the production of an acceptable Initial Cultural Strategy.

3.24 As a result, the applicant has recently appointed a specialist consultant 'Forty Shillings' who are currently undertaking further community engagement and local consultation to ensure that the Deptford community is involved in influencing and informing the Cultural Strategy. In parallel with the wider consultation the applicant is also working with Really Local Group, to bring forward a meanwhile and temporary use programme for the site, as part of the Cultural Strategy.

3.25 Points raised in relation to documents being missing online are noted. Following initial consultation which was conducted prior to all documents being available online, two further rounds of re-consultation were undertaken by the Council – the first being summer 2018 and the second having recently taken place February 2020. Hard copies of the submissions were also made available at the Pepys Resource Centre, near the application site, as well as Laurence House.

3.26 In relation to the affordable housing offer, the OPP was approved with 15% affordable housing site wide and did not specify which plots would accommodate affordable housing and which would accommodate private housing. As such, the proposal of P08 as 100% private is in accordance with the OPP and cannot be refused on affordable housing grounds as affordable housing provision is to be assessed on a site-wide basis, as opposed to plot by plot. Affordable housing would be provided elsewhere in the development – P15 being considered alongside P08 proposes 100% affordable housing.

3.27 The playspace provision for P08 is assessed in paragraphs 8.91- 8.97 of the officer report to committee. Playspace provision for P08 is in accordance with the strategy proposed at OPP and is in excess of the London Plan requirements. Officers consider that intervsibility has been maximised within the constraints of the building layout and shape as enforced by the OPP parameters.

3.28 With regard to greening, Plot 08 proposed 1187 square metres of biodiverse green roof and 972 square metres of biodiverse brown roof in accordance with Condition 14 of the OPP. A landscaped area at podium level is also proposed in accordance with the OPP parameters.

Objection to Plot 15

3.29 Plot 15 is located directly adjacent to Plot 08. Both plots would exhibit and equal quality of design and materiality with the same red bricks from P08, also being used for P15. Similarly, the quality of accommodation is considered to be on par. Additionally, lot 15 would be no noisier than any other residential plot located along the main spine road through the site.

3.30 The provision of shared ownership is in accordance with the S106 agreement of the Outline Planning Permission.

3.31 Lewisham Council consider London Affordable Rent as genuinely affordable housing. The planning service had negotiated an improvement over the affordable rent levels secured in the S106. The plot proposes 65 London Affordable Rent units including 18 three bedroom units and 2 four bedroom units – this would make a significant contribution to affordable housing in the borough and is a planning merit to which officers offer considerable weight.

Objection received from Alliance for Childhood

3.32 The proposed strategy to playspace provision was outlined at Outline Planning Permission, at this stage it was accepted that there would be an element of reliance on playspace off the application site. It is noted that in response to that, a Local Open Space Contribution of £560,000 has been secured to be used specifically for "improvements to all or any of the existing public park known as Sayes Court Gardens and other open spaces and play areas within the vicinity of the Development."

3.33 Nonetheless, the proposals for P08 provide in excess of 10 square metres per child as required by the London Plan therefore reducing reliance on off-site playspace

3.34 In relation to P15, the playspace provision would meet the requirements for 0-5 year olds with older children being catered for elsewhere on the application site, or in the surrounding area. With only a finite amount of space available within the OPP parameters, it is considered that the design team has maximised the amount of playspace that can be provided within P15.

3.35 Additionally, communal playspace totalling 1089sqm would be delivered on the application site, partially within Phase 1 and partially within Phase 3. Full details of this would be forthcoming with future applications.

4.0 CONCLUSION

4.1 The additional comments received are not considered to change the conclusion of the officer recommendations in respect of each of the three Reserved Matters Applications. The proposals are in accordance with the parameter plans of the Outline Planning permission and are considered to accord with the development plan – aspects of the proposals which require further consideration are adequately secured through conditions attached to the Outline Planning Permission, and additional conditions attached to each of the three recommendations for approval.