

Updated Lee Manor Society submission on Galliard Homes 2021 proposals for Leegate redevelopment

Galliard, developers of the Leegate site, have held an exhibition of their proposals to redevelop the run-down shopping centre as well as an online meeting with local groups and residents in recent weeks. **Nothing has changed** from the proposals the Society and others have seen in the past few months. Galliard continue to insist they need to go to 15 storeys on the crossroads corner. This will enable them, they say, to provide sufficient affordable housing.

We are still amazed that a redevelopment that started with only about 35 dwellings and rose to about 400 under the previous developer, St Modwen, now has to go to around 600 to make it viable. The Society felt at the outset that more homes could be put on the site but the numbers now appear to be totally **out of proportion**. We fear that a 15-storey building will dominate the crossroads, currently consisting mainly of three- and four-storey buildings, and cast a shadow over the whole area. Galliard's representative suggested during the online meeting that a tall building would draw attention to Lee Green as drivers passed through. This would be a **joke** if the matter were not so serious.

The idea of a tall 'point building' to anchor a development has been part of architectural thinking for decades but is inappropriate for this site. We are pleased that the new Leegate will incorporate a public square looking onto Burnt Ash Road. But this was inherited from St Modwen's revised scheme - which never got as far as a planning application - so does not reflect **any new thinking** on the part of Galliard.

Of course, we should not be surprised that a developer wants to maximise returns. We might have expected better from Lewisham's planners. But since they went along with St Modwen's original plan for a huge Asda supermarket on the site perhaps we should not be surprised that they have rolled over and accepted Galliard's plans. We know London and Lewisham need new homes but fail to see why so many of them need to be built on this one site. In attempting to make good central government's housing policy failings of recent decades the council and its planners appear to have **lost all sense of proportion** and any awareness of what is appropriate. None of the Lee Manor Society's arguments have been sucked out of the air. They are all based on copious planning documentation produced by officers in Lewisham and in the London mayor's office. The policies, rules and guidelines appear closer to **fairy tales** than serious statements of intent.

The process of recent months has been described as a consultation. In reality the local community has been **totally ignored**.

Heights

We have a serious problem with the height proposed for the north-west crossroads corner and the south-east corner. These are for buildings of respectively 15 and 13 storeys. This

compares with heights of ten and eight storeys in the original St Modwen plan, heights that were retained in the revised St Modwen plan of 2017.

Reference is made to the 11- storey height of the **Leybridge Court** estate. We have made the point before that this estate, set within extensive landscaping with mature trees, is not an appropriate comparator. It is well away from the crossroads and does not impinge on it in any way. We do not believe it is sensible to compare percentage increases in the height of the proposed buildings with Leybridge Court. Tall buildings on the crossroads corner would most definitely overshadow existing buildings that are of three and four storeys. It is with these three and four-storey buildings that the new Leegate should be compared. Clearly the existing 1960s shopping centre of five and eight storeys has established a higher level but there is a limit to what is acceptable.

The planning report to the meeting of Lewisham's **strategic planning committee** on December 16, 2015 stated: 'Various options including taller buildings were considered for this location but through testing it was considered that ten provides a sufficient height to mark the crossroads.' (para 8.) This wording was repeated in the planners' report to a second strategic planning committee meeting on May 17, 2016. It is clear from these two reports, accepted by councillors, that ten storeys were enough and, by implication, going any higher would be detrimental to the setting of the crossroads.

Lewisham's draft **Local Plan**, which picks up many themes from previous Unitary Development Plans and Core Planning Documents, sets clear conditions for the development of the borough's local/district centres. This plan has yet to be adopted in its final form but clearly sets out the council's intentions over the next 20 years. To ignore its guidelines on a scheme for which not a single brick has been laid would be folly.

- In QD4 Building Heights Section A states: 'The building height of development must respond positively to the distinctive character of Lewisham's neighbourhoods. Building heights should be appropriate in scale, taking account of the character of a site's **immediate** and wider context.' (my bold font)
- Section Bb states that proposals will only be supported where they 'are sensitive to the site's context, ensuring that development does not project above the streetscape and townscape.'
- Section F states that proposals for tall buildings will required to demonstrate that the development 'is designed with building heights that are sensitive to the site's **immediate** and wider context.'
- The Explanation of QD4 paragraph 5.30 states that Lewisham will support well designed and sensitively integrated higher density development 'that responds positively to its local context.'
- Paragraph 5.31 states that: 'Whilst acknowledging that London's skyline has and will continue to evolve over time, there remains an imperative to protect and enhance the distinctiveness and character of Lewisham's neighbourhoods.'
- Paragraph 5.34 states that proposals for taller buildings (two to three storeys above the surrounding area) 'must demonstrate an understanding of the site context,

including the historic pattern of development in a locality.... Not all existing tall or taller buildings will be appropriate references for new development.... Furthermore, the cumulative impact of taller buildings within a site or locality will be an important consideration.'

These policies relating to tall buildings are backed up by other sections of the Local Plan that call at OL1 A c iii for development to 'ensure that the district town centres at ...Lee Green ... retain their distinctive features' and at 3.45 that 'new development must be based on an understanding of the site context and respond positively to local distinctiveness.'

Lewisham's Local Plan reflects policies outlined in the mayor of London's **London Plan 2021**. The latter plan (Chapter 3 Design Policy D9 Tall Buildings) calls for developments to address the impact of tall buildings on long, mid and immediate views.

- With regards to mid-range views from the surrounding neighbourhood 'particular attention should be paid to form and proportions. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality.' (section ii)
- Concerning 'immediate views from the surrounding streets' the base of the tall building 'should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale ...to protect amenity...'

We are concerned that in the Society's online Teams briefing with Galliard representatives on February 26, 2021 we were told that the developer **did not** intend to reference the design features of existing crossroads buildings. In fact, because the existing buildings were from another era they **could not** be referenced. We find this to be an amazing statement in the light of Lewisham's policies as expressed above.

There is clearly a desire by developers to create a crossroads corner building that is distinctive. The idea of 'point blocks' to focus attention on a new development has been around for a long time. But it should not be allowed to override a sensible response to an historic if much abused crossroads.

Housing

The Lee Manor Society has argued from the outset of its involvement with Leegate – a period of more than a decade – that the site was capable of providing more housing. St Modwen's original thinking was to do no more than replace the **30-plus** flats on the site in its retail-led scheme. The numbers rose to '**up to 390**' under the revised St Modwen proposal (which did not reach application stage) and have since ballooned to '**circa 600**' from Galliard Homes. It seems to us inexplicable that this constrained site in one of Lewisham's smaller local centres should now be expected to accommodate so many units in order to deliver enough affordable homes. We have gone beyond the limits of what seems sensible. Galliard's 'viability' calculations will require close scrutiny by Lewisham's planners.

If all these additional homes do have to be accommodated on the site, - and we think them excessive - we believe they should be spread more evenly over the site. Fifteen storeys on the crossroads corner will be out of character with the rest of the crossroads and loom threateningly over its pavements. We have made the point before that high rise developments do not always suit families with young children or the elderly and that many developments of the 1960s have since been demolished. Lewisham's present focus on housebuilding, driven by government directives, needs to be tempered with a sense of what is appropriate and what works for people.

Impact on the Lee Manor conservation area and broader views. One consideration when looking at schemes of this sort is their impact on long-distance views and the horizon. The environmental statement prepared by St Modwen in February 2015 for its original, abandoned, scheme stated that views from Manor Park [they meant Manor House Gardens] was from a grade II listed historic landscape 'and shows the worst position [of Leegate] on its west side. The top two floors of the tallest building would be visible through gaps in existing mature trees whereas only the top of one of the Leybridge Court towers was previously visible, the environmental statement said. 'This is the only adverse effect on heritage significance,' it added.

It is clear that the taller buildings proposed by Galliard will have a greater impact on the long-distance views from nearby vantage points. Galliard have told us views will be measured from 20 different points. These will allow residents and planners to assess the impact of the proposed towers on views. They can hardly represent an improvement. Important though this issue is, for us, of far greater importance is the impact the increased height and mass will have on the immediate vicinity, the Lee Green crossroads and pavements.

Quality

The Local Plan suggests that if a development is of sufficient quality this may override other considerations that would prevent it being approved. This is something of a 'get out jail free card' for developers and planners and we would not want it to be used here. The original St Modwen scheme did appear to offer high quality frontages using, in the main, brick. We would hope this commitment would be maintained by Galliard Homes.

We would like the above remarks to be considered as the Lee Manor Society's contribution to discussion of the Leegate renewal proposals.

Charles Batchelor for Lee Manor Society April/December 2021.