

Lee Manor Society objection to planning application DC/22/126997 for the redevelopment of the Leegate shopping centre, Lee Green

Introduction.

There are aspects of the proposal that we welcome, notably the creation of a public square facing onto Burnt Ash Road and a new public street on the southern boundary (Carston Close). We recognise the need for more housing, though not on this scale, and for the replacement of the existing run-down 1960s centre. But we also have serious reservations.

The developer, Galliard, talks of its wish to 'transform' the Lee Green crossroads. It will certainly do that. The local shopping parades and the leafy and suburban surroundings of the crossroads will be dominated by a retail hub excessive in both height and mass. If Leegate is redeveloped on this scale it will inevitably set a precedent for other sites surrounding the crossroads, in particular the currently low-level Sainsbury's supermarket.

The devastating impact of Lewisham's present policy on high-rise, intensive development can be seen only too clearly in the town centre redevelopment which has created gloomy canyons of tall blocks surrounding a minute riverside park. The pedestrian experience at pavement level is unpleasant.

Other recent residential developments, including the blocks running from Catford Bridge to Ladywell Fields, have been carried out on a much more human scale at around eight storeys, not the 15 proposed at Leegate. Historically much high rise development has been set in landscaped surroundings that soften their impact (the Lewisham Park blocks and – in Greenwich – Lethbridge Estate, Lewisham Road.)

Galliard has made use of specialist consultants in preparing its bid. We highlight two. One, covering the impact of the proposed redevelopment on nearby heritage assets, strains the English language to justify the scheme while a closer reading of its assessments reveals problems. The second interprets the findings of Galliard's public consultation in a way that stretches credulity and shows a poor grasp of simple arithmetic. **This undermines the credibility of this application.**

In matters of consultation, Lewisham's planning department has performed poorly. The late-lamented Commission for Architecture and Building Environment (CABE), urged planning departments to assist objectors where possible given the asymmetrical nature of the resources available to the two sides. We have met with silence from the planners.

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...'

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.

Heritage

Galliard's 'vision' for the redevelopment as expressed in the Design and Access Statement announces its intention 'to respond sensitively to the local historic context and neighbouring heritage assets in reference to the existing urban grain and materiality [what does this mean?] evident at the Tigers' Head junction and surrounding context.' We fail to see how the insertion of a dominating tall building within yards of several listed building (local and statutory) and the Lee Manor Conservation Area enhances their setting.

The project's environmental statement, prepared by planning consultants iceni, concludes to our surprise that the impact of the new centre on local heritage buildings will in most cases be minimal and will in fact have a 'beneficial' effect. The development 'is seen as a high quality addition to the local context of the conservation area, enhancing the character of its landscape setting.' A reading of this report that applies the usual meanings to the English language reveals confusion and more complex picture.

For example, the Lee Green Fire Station (Grade II) of 1906, directly opposite Leegate, is described as being 'of medium sensitivity to change' though the 'overall effect' of change would be 'major to moderate and therefore significant'. However, in the next sentence the report describes the effect as 'beneficial because while taller than the existing Leegate

Centre buildings the Proposed Development would be of much greater architectural quality.’ **Can anyone make sense of this argument?** The quality argument would appear to override every other consideration however large, inappropriate and dominating the new buildings.

Similarly, the effect of the proposed new build on the Old Tiger’s Head, (locally listed) of 1896 and diagonally opposite the 15-storey corner tower is described as ‘high’. However, ‘the overall effect would be minor to moderate and therefore significant.’ But, the next sentence assures us, ‘The effect would be beneficial because Block A1 [the tall tower] of the Proposed Development would much more effectively address the junction.’ **Pass the Paracetamol.** This is planning jargon taken to a high level of incomprehensibility.

Consultation

The Statement of Community Involvement document prepared by Kanda, a consultancy, gives a highly contentious view of the public consultation, skewed to finding support for Galliard’s proposals.

We have no problem with the consultation exercise carried out by Galliard, which appears to have been thorough. It is Kanda’s interpretation of the results that are seriously deficient.

Kanda’s summary of the Lee Manor Society’s response to the consultation is incomprehensible. Section 4.13 of the Comments from community groups states: ‘The Lee Manor Society sought to link our proposals to the Local Plan allocation and referenced the Committee Report for St Modwen’s 2015 Application which secured a ‘resolution to grant’ in 2016.’

As a summary of our closely worded four-page submission arguing a range of issues including building heights, housing, impact on the conservation area and quality this is woeful. We didn’t ‘seek’ to link the proposals to the local plan; we did link them – and justifiably - to this important and very relevant document. The reference to St Modwen’s 2015 application appears to be an attempt to downplay the topicality of our comments.

In its Conclusion Kanda suggests that the decline in the number of responses to its November 2021 consultation compared with the April 2021 consultation indicated ‘the community is generally supportive of the evolution of our plans.’ Public weariness with the long-drawn out Leegate process which has lasted more than a decade appears a much more likely reason.

Section 5.6 of the Conclusion accepts that while a number of local residents had strong views on issues such as the height of the corner building ‘this issue was only raised by c.59 per cent of respondents.’ **Any politician in a democracy voted in by 59 per cent of voters would regard that as a considerable success.** To dismiss a 59 per cent figure of people raising this issue – presumably to object – is ludicrous and undermines the validity of Kanda’s conclusions.

However, Kanda puts this 'into the context of 86 residents comments against 13,000 invitations [representing] just 0.66 per cent of local residents raising this concern.' Since only 1.7 per cent and 1.6 per cent of residents responded to the two consultation exercises, 0.66 per cent looks a sizeable chunk to us. (Kanda gets confused at this point referring also to 1.1 per cent rate of response to one of the consultations. This appears to be a typing error.) All these response figures look low but that is usually the case with consultations of this sort.

Kanda's calculations appear equally wonky in section 5.4 where it describes 457 responses out of more than 26,000 invitations issued as a resident response rate of 3.5 per cent. A quick check with the Society's calculator shows this to be a response rate of 1.75 per cent. (Kanda appears to be uncertain whether Galliard has sent out 13,000 or 26,000 invitations.) Leaving this aside Kanda concludes 'It is our interpretation of those responses that the community is generally comfortable with both the principle of the regeneration of this site, and with the Applicant's proposals specifically.' It is a big leap to go from dissatisfaction with the present run-down centre to support for any redevelopment and then on to support for this redevelopment in particular. Even Kanda's poor grasp of simple addition and percentages makes it clear this is not the case.

Conclusion

In summary, this is a scheme that ignores extensive planning guidelines on heights and massing, supported by confused and tendentious specialist assessments that do nothing to support the applicant's arguments.

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