



OBJECTION to Section 73 Planning Application DC/25/140732 for the approval of a Minor Material Amendment to planning permission ref DC/22/126997

In relation to the recently adopted Lewisham Local Plan (July 2025) (LLP) the Council has stated that:

‘Our newly adopted Local Plan gives the Council a framework for managing growth , so that it is done sustainably, fairly and follows principles of ‘Good Growth’.

That is Lewisham Council’s stated aim at:

<https://lewisham.gov.uk/myservices/planning/policy/adopted-local-plan/adoption-of-the-local-plan>

The Mayor of Lewisham has said:

‘Adopting this new Local Plan gives us the strategic direction and tools to continue growing the borough in a sustainable and fair way as well as unlocking the opportunities our residents deserve. The plan will ensure Lewisham continues to be a welcoming place, where diversity is recognised and protected. A place that people want to visit, live in, where they choose to stay and enjoy a good quality of life and feel supported to achieve their full potential’.

This Objection by the Lee Manor Society (LMS) will seek to see whether the Application in question here (as noted above) achieves Lewisham Council’s very clearly stated aims or not.

1.0 Together with the London Plan and the Lee Neighbourhood Plan, the new LLP forms the statutory Development Plan for the London Borough of Lewisham and it both guides and informs decision-taking on all development proposals across the Borough. When in submitted draft the Local Plan underwent both rigorous independent and public examinations and included the production of technical supporting evidence and engagement with Lewisham residents, communities, stakeholders, and partners. As such the new LLP is a document that cannot be ignored or directly overridden by Lewisham Council without clearly stated material benefit to Lewisham’s communities along with clear reasoning as to why an agreed and adopted strategy has been so overridden. To do so without material benefit and logical reasoning would put Lewisham Council at odds with the very people it claims to serve and at odds with the very policies it claims have brought forward by rigorous testing.

Nevertheless, when the LLP was in draft form in 2024 Lewisham Council overrode the draft provisions for the Leegate site set out in Policy QD4 being that the development site was suitable only for buildings of between 10 to 12 storeys in height (or 32.8 to 39.2 metres above ground level) and provided for around 450 ‘Net residential units’. Even where buildings reached these heights guidance was provided that:

‘Although maximum heights are provided for each of the Tall Building Suitability Zones, proposals will still be expected to include robust design justifications for the heights proposed. This will include the testing of possible impacts upon key views’.

The Lewisham Planning Committee overrode these provisions and clearly stated that they were doing so because the Local Plan had not yet been adopted by the Council and thus was advisory only.

Well that position is no longer the case and Lewisham Council now needs to be seen to abide by the *‘rigorous independent and public examinations’* that took place in the formulation of the LLP and reject the current Section 73 Planning Application for the revised Leegate development proposals, as being not only in contravention of the LLP but also both an over-development and



an incongruous development for a 'District Centre' that is out of all proportion to the close-knit neighbourhood into which it is being forced by its developers.

But it is not as simple as that because DC/22/126997 was approved for development back in late-2024 and the current Application being objected to here is for a Section 73 Application which seeks only to modify the 'Conditions' of the previously approved Application (so as not to require a wholly new Planning Application) by way of so called 'minor material amendments' that London Square and their Agents have stated are as follows:

- a. 59 no. additional residential units (from 561no. to 620no.);
- b. Increase in quantum of affordable housing from 36.2% to 46.3% (by habitable room);
- c. Changes to residential unit mix;
- d. Changes to massing of Blocks A, B and C, including an increase in the maximum height of Building A1 from the consented 15 storeys to 17 storeys;
- e. Reduction in residential and commercial car parking (provision of 21no residential and 1no. commercial blue badge bays);
- f. Removal of Block A basement;
- g. Relocation of the medical centre to the ground floor of Block B;
- h. Reduction in overall commercial floorspace;
- i. Revised energy strategy from individual Exhaust Air Source Heat Pumps to a Communal Air Source Heat Pump system;
- j. Variation of Planning Conditions.

To put those 'minor material amendments' (our underlining) into perspective in the order they are listed above:

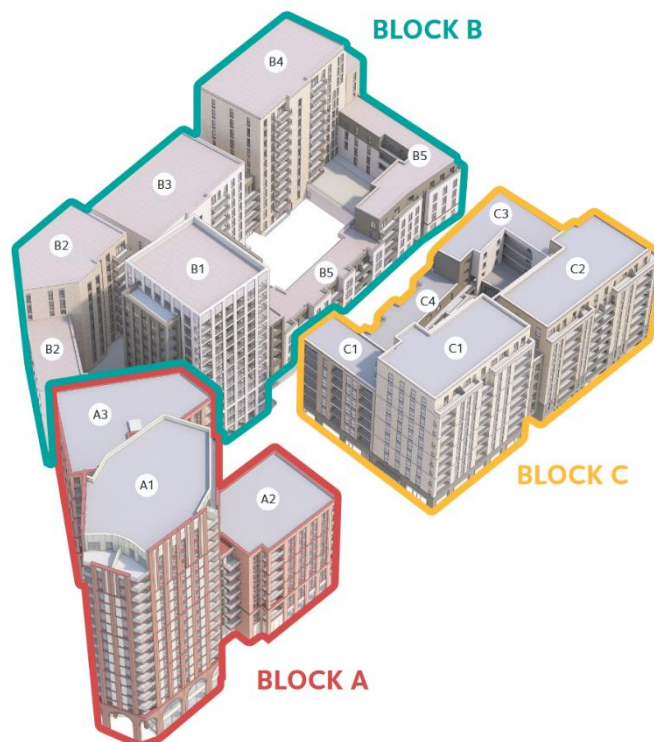
- a. The number of additional new residential units represents an increase of just over 10% of the previously agreed number of units and cannot in any circumstances be regarded as a 'minor' change. (It also represents an increase of nearly 25% over the draft LLP residential unit numbers albeit the adopted LLP has now unsurprisingly used the Galliard figure of 562 units);
- b. Within the Planning Statement Addendum document submitted by Galliard dated 27th February 2023 for application DC/22/126997 the previous number of residential units was given as 562 with a total of 1469 Habitable Rooms. Of these around 36.4% were stated as being Affordable Housing, i.e 173 Residential units and around 535 'Habitable Rooms' varying from Studio flats up to 4-bed 7-person flats and most options in between. From the current Planning Statement dated 3rd July 2025 submitted with the application in question (DC/25/140732) the number of residential units is now given as 620. (The number given during public consultation in June 2025 was '*around 640*'). The number of proposed habitable rooms does not appear to have been specified with the new Planning Statement – it simply says that '*this equates to an increase in affordable housing provision from 36.2% to 46.3% calculated on a habitable room basis*'. Residential unit types this time vary from Studio flats up to 3-bed 6-person flats. All 4-bed 7-person flats (previously representing 12 residential units) have been removed from the proposed scheme;
- c. In terms of the change of residential mix there has been a reduction in the number of Studio flats by around 50% (from 18 units down to 9 units), a reduction in 1-bed 2-person flats (from 265 units down to 230 units), a significant reduction in 2-bed 3-person flats (from 60 units down to 20 units), a significant increase in 2-bed 4-person flats (from 158 units up to 276 units – an increase of around 75%), a removal of all 3-bed 4-person flats (from 6 units down



to 0 units), an increase in 3-bed 5-person units (from 42 units up to 57 units), an addition of 3-bed 6-person units (from 0 units to 28 units) and finally the removal of all 4-bed 7-person units as previously noted. It is noted that all Affordable Housing is now intended to be housed within the Block B buildings because of their proximity to the Leybridge Estate.

All of this change comes under London Square's description of '*minor material amendments*' when in fact the proposed changes are quite the opposite – they are significant changes to the proposed residential mix which needs thorough review by Lewisham's Housing Team to assess the needs of the local community against what the developer is proposing.

- d. The change to the height of Building A1 is not the only proposed so called 'minor' change. In reality:
- There is a proposed increase in the height of Building A1 (fronting onto the Lee Green crossroads) by 2 storeys (plus roof-top plant) from 15 storeys up to 17 storeys (which contravenes guidance given within the adopted LLP). Roof-top plant is noted here because there is no longer a proposal to have a basement plant room in building A1 as there was previously;
 - There is an increase in height of the major element of Building B1 by 1 storey from 12 storeys up to 13 storeys (which also contravenes guidance given within the LLP);
 - There is an increase in height of the major element of Building B4 (fronting onto Leyland Road) by 1 storey from 10 storeys up to 11 storeys plus an additional rooftop plant area (which depending on your point of view may also contravene the LLP);
 - There is an increase in height of the combined elements of Building C1 (fronting onto Burnt Ash Road) from two building elements of 5 and 8-storeys up to two building elements of 6 and 9 storeys respectively with a recessed 10th storey over the 9-storey element;
 - There is an increase in height of Building C2 (fronting onto Burnt Ash Road alongside Building C1) from 8-storeys up to 8 storeys with a recessed 9th storey plus an additional rooftop plant area.





The above are all so-called 'minor' changes (as stated by the developer London Square) which of course they are not. Two of the three changes clearly contravene the LLP and as such should be rejected by Lewisham Council. London Square have stated in their Consultation document that:

'To bring the previously consented scheme into line with new fire and building regulations, and to boost the level of affordable housing from 35% to c.45%, we are proposing to deliver around 70 more homes than the consented scheme, from 561 to around 640. We are proposing to deliver these additional homes through rationalising the design, and adding additional storey heights to key buildings within the scheme'.

But following public consultation in May/June 2025 the developer changed its mind in the face of a significant swell of local public opinion against their proposals and have now submitted their Section 73 Application for 620 residential units and have reduced the height of tower block A1 from a proposed 18-storeys down to 17-storeys. But in doing so London Square have continued to completely ignore local opinion – had the public have been asked the great swell of local opinion would have also been against any increase in the height of tower block A1 at all, but of course developers have deaf ears.

And the developer also stated:

'London Square acquired the site from Galliard Homes earlier this year and their focus is on updating and adjusting the planning consent secured in November 2024. This involves making changes so that the plans meet new fire and building regulations which were introduced after the previous plans were approved, and an increase in the number of homes proposed so that the amount of affordable housing delivered can be increased'.

From the London Square statement noted above we can see that their proposed changes have come about as a result of 'new fire and building regulations' since the scheme was approved in November 2024, but for the most part the effect of regulation changes have not affected the proposals and this is very clearly an untrue statement for London Square to have made. During the process of the previous Galliard planning application (DC/22/126997) the Government consulted on proposed changes to Building Regulations (and in particular the fire regulations contained within Approved Document B Volume 1) to provide for second staircases in all new tall residential buildings over 18 metres high. Galliard responded to this by issuing new updated drawings as a part of their April 2023 submission (of revised drawings and other documents) showing two staircases to each building with a residential floor level higher than 18 metres above ground level. So Galliard had pre-empted the revisions to Building Regulations that subsequently followed – but they had erred on three of the buildings: buildings B3, C1 and C2 were not shown with such double stairs even though they should have been as each had a floor level over 18 metres high. So in actual fact London Square only had to revise the floor plans of buildings B3, C1 and C2 and not all of the buildings as they have tried to indicate they have done. In reality when the proposed movement of the Medical Centre from building A first floor (along with a reduced area of Residents Lounge and a removal of the Gym) was moved down to building B ground floor, this required change to buildings B3, C1 and C2 would most likely not have resulted in the need for any new Residential Units at all because of the increased availability of space at first floor level of Building A resulting in more residential units at that location – the loss would have been to the non-residential floorspace alone as it is within the current proposals.



To summarise the proposed changes to the massing of Blocks A, B and C:

- Group A buildings comprise of 3 subset buildings (A1, A2 and A3) of which one building (block A1) is proposed to be 17-storeys high, whilst another (block A3) reaches 10-storeys high. The former is 2-storeys higher than the previously consented scheme and is 5-storeys higher than the 'normally' accepted maximum for this site of 12-storeys as set out in the LLP, whilst the latter reaches the lower maximum set out in the LLP. But that is not all – the LLP also sets out the maximum building heights based on heights from ground level of a maximum of 32.8 metres (10 storeys) up to 39.2 metres (12-storeys). Building A1 breaches this higher limit by just under 20 metres on its two sides meaning that it exceeds the normally accepted height limit in metres from ground level by just over 50%! This can in no way be considered as being in anyway acceptable and if approved would show that the Lewisham Local Plan is an irrelevance to developers, the Council and the public alike. In summary two out of three of these 'A' group buildings exceed the LLP normal 'maximum' limits;
 - Group B buildings comprise of 6 subset buildings (B1 to B6) of which building B1 is proposed to be 13-storeys high (with a smaller element at 5-storeys high), an increase of 1 additional storey over the extant planning permission, building B2 with two elements at 7 and 10-storeys high, building B3 at 8-storeys high, building B4 having two elements at 8 and 11-storeys high, an increase of the latter by an additional 1-storey, building B5 at 5-storeys and building B6 at 3-storeys high. So in relation to the Building B grouping one building (B1) is one storey above the normal 'maximum' limit set by the LLP of 12-storeys whilst building B4 has an element that sits above the normal 'maximum' limit of 10-storeys and building B2 has a 10-storey element that reaches the normally acceptable lower level maximum storey height. In terms of height above ground level building B1 is in excess of the maximum higher limit of 39.2 metres above ground level set out in the LLP for this site, but in our view this building is set well away from either Burnt Ash Road or Eltham Road and so we consider this to be more or less acceptable. We would much prefer additional height where it is to be proposed in excess of the limits set out in the LLP to be set away from the main public streets where such excess height becomes highly imposing.
 - Group C buildings comprise of 4 subset buildings (C1 to C4) of which building C1 has two proposed elements of 6 and 9-storeys in height with a further recessed 10th storey sitting over the 9-storey element. This building was previously composed of two elements of 5 and 9-storeys high. Whilst building C1 reaches the lower normally acceptable maximum height level of 10-storeys it does so by recessing the 10th floor away from the public west face and so again is a good deal more acceptable in that respect. Building C2 has increased in height from 8 to 9-storeys high but again the 9th storey is recessed which is acceptable. Buildings C3 and C4 are of 5 and 3-storeys high respectively.
- e. The reduction in residential and commercial car parking from 60 Residential parking bays (of which 18 were Blue Badge holder bays) and 16 Commercial bays (of which 2 were Blue Badge holder bays) in the extant approved scheme, to a significantly reduced provision of 21 residential Blue Badge bays only and 1 commercial Blue Badge bay, can only be described as a very significant change to the approved Application DC/22/126997 and one which is of great and immediate concern to many Lewisham residents who live in the vicinity of this development. Irrespective of whose policy it is to enforce these parking provisions onto developers within London (whether it be the Mayor of London or Lewisham Council) this significantly reduced number of parking bays (essentially none whatsoever for able-bodied



new residents of Leegate – discrimination at its worst), represents a highly unrealistic provision for a mixed use development for which the nearest train station is over 500 metres away (as the crow flies) and there is no other availability of parking. Everybody knows what will happen next – new residents will seek to park in surrounding streets, but Lewisham Council have already become smart to this and have required the developer to fund a CPZ study by way of the current Section 106 Agreement to the tune of £30,000* for the Council to undertake a CPZ Review and Implementation. And what will the outcome of that review be? Lewisham Council will invoke CPZ's in all roads immediately surrounding the Leegate development where none may currently exist. And who will reap the financial reward from new residents with cars at Leegate, from visitor parking payments and from fixed penalty notices issued to wrongly parked cars/vans/lorries? Yes Lewisham Council again! All-in-all a purely money-grabbing exercise yet again on Lewisham Council's behalf. If a sufficient or reasonable number of parking spaces were provided within the development in the first place then absolutely none of this predicament for CPZ areas would have been required. Lewisham Council should ask themselves where on earth is a resident to park in order to deliver weighty goods to their apartment, or a trader to park to mend a broken fridge anywhere within the development. This proposal is simply unrealistic. Two possible Car Park Club bays set on Leyland Road is again an unrealistic attempt to provide parking for some 2000 new residents. LMS have searched the proposed ground floor site plan to see if any general parking of any form has been proposed, either around or within the site, and none at all can be found. However, there is a single lay-by drawn on Burnt Ash Road alongside building C2 (and approximately opposite Abbey Manor College), but there is no annotation as to what it is for. Burnt Ash Road is however an Urban Clearway (Monday to Saturday 7am to 7pm) and so any parking immediately off of it is likely to be limited controlled parking. There is also what appears to be a number of bays between newly proposed trees to be planted within the pavement of Leyland Road immediately to the eastern boundary of the Leegate site. However, these bays do not appear wide enough for any form of parking. The parking detailed above should be contrasted with the cycle parking provision – 13 separate internal storage areas at ground floor level are proposed across the three building groups for the storage and parking of around 540 individual cycles. We would suggest that probably only 25% of these spaces will actually be used, with cycles of any reasonable value being stored either internally to apartments or, as can be seen on most modern high-rise developments, stored on their external balconies.

**Note – this sum may change (most likely upwards) as a result of the current application as there will no doubt be change to the Section 106 agreement. As no parking bays are to be provided at all other than Blue Badge bays then parking will become of serious concern to new residents almost certainly requiring a greater expansion of any CPZ measures to be reviewed and implemented leading no doubt to a greater cost to be put at the developers feet.*

- f. The removal of the building A1 basement is of no particular concern to LMS except for the fact that the plantroom previously contained there will most likely end up on the roof of the 17-storey tower building A1 which again increases its height above and beyond the normally acceptable maximum levels set out in the adopted LLP.
- g. The relocation of the Medical Centre to the ground floor of building B2 is in our opinion a very sensible move. Not only does it make the Centre far more accessible and visible but it releases valuable first floor space in buildings A1 and A2, and along with a reduction in the



size of the proposed Residents Lounge (and the removal of the Gym at this first floor level) provides a good deal more space for the additional residential units that London Square state that they need to enable their proposals to be 'deliverable'. However, this relocation of the Medical Centre has the downside of reducing the total non-residential floorspace and as a result the ground level Supermarket has had to reduce in size significantly. London Square has put together a reasoned argument for a reduced Supermarket which we have no objections to.

- h. The reduction in overall commercial floorspace (or total non-residential floorspace) appears to be from approximately 3,800m² down to around 2,835m² giving a loss of around 965m² or 25% of the total previously approved total floorspace. The commercial floorspace was previously calculated to provide 136-183 FTE jobs during its operational phase and this will clearly reduce now by around the same 25%. This estimated job creation may no longer therefore result in an overall increase in jobs compared with what the existing situation was prior to closure of the existing retail shops and restaurants, etc. The existing Commercial (or non-residential) floorspace is given within the Commercial Strategy document submitted with the current application as being 13,930m² which typically includes community uses, F+B, leisure, office and retail albeit this figure includes storage, back-of-house facilities and ancillary spaces which may be at an upper level not at ground level. But what can be seen is that the proposed non-residential floorspace of the current proposals are a significant reduction from the existing offer. London Square have stated in their consultation document that *'The amount of ground floor commercial space remains broadly the same...'* and whilst this may be the case (on the ground level at least) it has significantly reduced the availability of FTE jobs on the site compared to what was previously provided.
- i. From the Lee Manor Society's point-of-view we have no concerns in principle with the revised energy strategy for changing from individual Exhaust Air Source Heat Pumps to a Communal Air Source Heat Pump system so long as visibility of any heat exchange units or similar such plant is correctly handled aesthetically and that any visible elements of the system are placed well away from publicly visible areas;
- j. Lastly, the required variation of Planning Conditions set out in the Decision Notice relating to DC/22/126997 will we believe relate to the following Conditions:
 - Condition 2: Approved Quantum
 - Condition 3: Development in accordance with approved drawings and documents;
 - Condition 10: Energy;
 - Condition 11: Biodiverse Living Roofs;
 - Condition 18: BREEAM;
 - Condition 20: Mechanical Ventilation with Heat Recovery Units;
 - Condition 29: Cycle Parking Details;
 - Condition 31: Floor Levels;
 - Condition 32: Flood Resistance and Resilience;
 - Condition 46: Residential Parking;
 - Condition 47: Commercial Parking (Supermarket);
 - Condition 49: Exhaust / Air Source Heat Pump;
 - Condition 56: Details of Internal Blinds;
 - Condition 60: Whole Life Cycle Carbon;
 - Condition 71: Flood Risk Assessment.



Clearly until such changes occur to the Section 106 Agreement we cannot comment on them albeit we will review such submissions as are made in future to Lewisham Council by the applicant.

- 2.0 London Square sought (under a Section 96A application – DC/25/140113) to remove the words ‘*up to 15-storeys (including basement)*’ from the Decision Notice of DC/22/126997 such that in submitting a new Section 73 application it would not be undermining the fundamental substantive nature of the previously approved Application (DC/22/126997) by proposing the changes currently set out within DC/25/140732.

It is worth noting that the proposals London Square sought to consult on with Lee Green residents in June 2025 are not those currently submitted under the Section 73 application because buildings have yet again changed their heights , so the current proposals as submitted have not had the benefit of a real consultation process.

- 3.0 The Lee Manor Society along with many residents of Lee Green, with Lewisham Council and with other local amenity groups and societies, fully accepts and agree that the Leegate Centre needs obvious redevelopment and one that should be able to be undertaken to world-class design and construction standards – there is no reason why the people of Lee Green and the London Borough of Lewisham should accept anything less, but the designs for the currently proposed development are not world-class and now seek to increase the already over-developed poor design of DC/22/126997 (approved 1st November 2024) and to create even further over-development. This despite Lewisham Council’s stated aims that ‘*Development proposals must follow a design-led approach to contribute to delivering high quality, inclusive, safe, healthy, liveable and sustainable neighbourhoods in Lewisham*’. (LLP QD1 Clause A page 67). The Lee Manor Society are absolutely certain that the Leegate Centre development as currently proposed will not win any architectural or civic society awards as it is currently designed and neither is it world-class in terms of sustainability. What it is is mediocre at best.
- 4.0 The current Leegate development undertaken in the 1960’s had seriously failed well before the Year 2000 after only around 40 years of operation. From around Year 2000 onwards the site went into significant decline and has never recovered. Its failure is as a direct result of Lewisham Council and its original developers failing to have the foresight of how tall buildings and their immediate surroundings would function with a lack of vision and a lack of funding. This is particularly so when such ‘modernist’ or ‘over-developed’ buildings are ‘forced’ into a Victorian and/or Edwardian neighbourhood where such buildings can rarely ever fit into an established low-rise local community. Over-development is simply that and rarely does it ever lead to a long-term successful conclusion as can be seen from numerous 1960’s and 1970’s town centre developments across the country. Only where successful integration has occurred with sufficient on-going (often developer-led) funding have such developments ever had any chance of success.
- 5.0 The LLP in relation to the Leegate site and wider community areas states in its Preface a number of things:
- That ‘*Lewisham will continue to be a welcoming place ... (where) we will give people the security and certainty they need so that everyone can live their best lives...Lewisham will be a place where all generations not only live but also thrive. A place that people want to visit and live in, and where they choose to stay and enjoy a good quality of life. A place where you can get on, regardless of your background and where you are always treated fairly and are supported to achieve your full potential. Lewisham will continue to be a dynamic place,*



reflecting the strength of its communities, and partnership working with our community remains at our core. We are proud of the vibrancy of our high streets, local businesses, arts and cultural establishments ... We will contribute to and share in more of London's future prosperity, becoming a greener, healthier and more resilient place by leading the way in responding to the global climate emergency. Most of all, we want you to love living in Lewisham'.

In relation to the Leegate site almost none of that rhetoric is true:

- A 17-storey tower Block A along with 8 and 10-storey Blocks A2 and A3, with a 13 and 10-storey Blocks B1 and B2 buildings and 10 and 9-storey Blocks C1 and C2 respectively tightly hugging both Eltham Road and Burnt Ash Road these buildings will do nothing to create a welcoming place in Lee Green. Quite the opposite they will create a constricted and restricted environment in which cars and car noise will dominate due to the manner in which the massing of the buildings rise up so strongly against the roads immediately alongside them. The surrounding existing 2,3 and 4-storey residential, public and commercial buildings will become subservient to the massing of the Leegate development and will deteriorate over the years to come as a direct result of this;
- It is highly unlikely that any family living in a single aspect apartment above the fourth floor of any of the proposed residential buildings (Blocks A1, A2, A3, B1 to B4 and C1 to C2) will be '*living their best lives*' as Lewisham Council states. Quite the opposite. Research clearly shows that such families should not live above a fourth floor position and should have dual aspect living if their lives are to be tenable. Galliard previously determined that dual aspect living was not '*technically feasible*' and London Square have done nothing to address this concern. What Galliard really meant was that they had no intention of creating world-class housing for the residents of Lewisham.
- Anyone who has lived in and around London will tell you that Lewisham is not generally a place that people choose to want to visit – there is very little of any real intrinsic value that draws people to Lewisham, either culturally or architecturally, as far as other Londoners are concerned and Lewisham Council has done little over many years to attract visitors to its centre or general Borough-wide area. It is not somewhere on the whole where people choose to stay and enjoy a good quality of life because the reasons for people wanting to do that have been systematically eroded away by Lewisham Council in destroying the factors that make such communities want to stay together. Lewisham Town Centre is an obvious example of that approach. Many many residents of the London Borough of Lewisham now avoid going into its Town Centre because doing so has been made particularly difficult and there is little of any real value there now to warrant the slog to get into it. Many residents (from our experience) now prefer to go to Bromley, Eltham or Bluewater rather than face the trials and tribulations of Lewisham Town Centre where daylight between buildings has been so seriously affected by the almost uncontrolled building of high rise properties. The defensive atmosphere of London's 'Nine Elms' district (where wall-to-wall high-rise buildings now exist along Nine Elms Lane leading to Battersea) has now reached Lewisham and it is all the worse for it. But Nine Elms has one major aspect working for it that Lewisham does not – in entering into its huge building programme some 10-15 years ago the developers sought the use of world-class architects and urban designers renowned for their building designs internationally. Lewisham has signally failed to do that and is the worse for it. And yet Lewisham does have a building complex designed by a leading world-renowned architect on the site of the former Ladywell Leisure Centre. This £4.3m development



which includes 24-homes and eight units on the ground floor (for community or business use) has been completed on site for a number of years and is easily in terms of its construction quality the worst building ever to come from the office of the Richard Rogers Partnership (now RSHP Architects), a world-renowned architectural office. The building is so unkempt today and so poorly maintained that it is deteriorating before our very eyes – and that is ‘quality’ as Lewisham Council would have us believe. Delivering ‘*high quality design*’ is not a mantra that Lewisham Council really believes in and they will not deliver places where generations will live and thrive in as they state.

- In terms of consultation we have all experienced requests from Lewisham Council for residents to become involved in discussions about the way ahead for the future over many issues within their locality not just significant building developments. From traffic measures, to road calming, to LTN’s and large-scale housing developments we have all been asked to give our opinions to Lewisham Council as its ‘residents’. But from our experience the breadth of knowledge we bring as residents in the Borough is wholly ignored by Lewisham Council in favour of revenue generating measures only. Take a very simple example that exemplifies all that is wrong with Lewisham Council:
 - LTN’s and the use of heavy planters to block off entry/exit into certain residential roads around the borough – these were unloved from the very beginning (around 2021) and remain so. Today they are decaying edifices to Lewisham Council’s gluttony in seeking Penalty Fines for breaching LTN rules by evading them. Not once have we seen these planters being maintained other than by local concerned residents. They were a knee-jerk reaction by Lewisham Council to reap the rewards of revenue generating measures only. In their decaying state they exemplify what is wrong with Lewisham Council’s decision-taking on a much wider basis.
- Lewisham Council claim above that the London Borough of Lewisham is place where you can get on, regardless of your background and where you are always treated fairly. So how fair are Lewisham? A further simple example will again exemplify this: Section 96A Planning Application DC/25/140113 sought to remove the words ‘*up to 15-storeys (including basement level)*’ from the Decision Notice issued in relation to application DC/22/126997. The applications referred to related to the extant planning approval notice for Leegate and the attempt by the (new) developer London Square to remove ‘material’ wording from that Decision in order to allow the submission of a further Section 73 Planning Application being the subject of this Objection. Lewisham Council’s decision issued on 30th June 2025 was that this was not a material change and that in removing the words noted these were ‘immaterial’ to the Decision Notice. The developer is now free to modify their proposed mixed-use development scheme as they see fit without any concern as to raising the heights of the residential Blocks that make up the works and most importantly to ignore the 15-storey restriction set by Lewisham Council in its definition of ‘Development’ and in the Conditions attached to the Decision Notice. But there are two issues here:
 - Firstly, it was Lewisham Council who wrote the words ‘*(including basement level)*’ into their description of ‘Development’ within their Decision Notice ref DC/22/126997 for the Leegate development. The developers Application Form had simply stated buildings ‘*up to 15-storeys*’. In providing for ‘*15-storeys (including basement level)*’ this is actually approving a 14-storey tower Block A1 building and a single basement level giving 15-storeys in total – that is not what was shown on the developer Galliards drawings which clearly showed 16-storeys in total including



the basement level. So Lewisham Council made a clear error that they have not owned up to. How best to eradicate that error – just agree to its removal by way of London Square’s Section 96A Application and simply state that the matter is ‘immaterial’. What can the residents do about this – absolutely nothing! There is no appeal from such a decision and Lewisham Council very clearly knew that. Well we see what Lewisham Council is doing and they are not treating their residents ‘fairly’ as they state in their Preface to the LLP noted above.

- Secondly, in relation to the above point Lewisham Council received 93 comments on the Section 96A Application (DC/25/140113) issued by London Square as referred to immediately above with 87 Objections and 2 in Support. Of the Objections there is little doubt that a good number would have objected to issues of height rather than the crux of the Application which was whether the words ‘*up to 15-storeys (including basement level)*’ were material or not to the Decision Notice. Under an overwhelming objection to this application Lewisham Council sided with the developer and ignored the residents of Lee Green’s objections when they had clearly made their concerns known – but of course Lewisham Council states that it acts ‘fairly’ towards its residents – this small issue shows typically that it does nothing of the sort and acts only in favour of greater revenue generating enterprises irrespective of the consequences of their decisions. In almost no other sphere of life would such odds result in the decision that Lewisham Council came to. Lewisham Council DOES NOT work in ‘partnership’ with its individual communities and does not ‘at its core’ have acting fairly as its natural working process. Most importantly of all Lewisham Council does precious little in reality to allow their existing residents ‘to love living in Lewisham’.
- In relation to Lewisham Council’s statement above ‘*We are proud of the vibrancy of our high streets, local businesses, arts and cultural establishments ...*’ we would strongly urge the Council to seriously look at the state of Lee High Road and the quality of buildings, premises and commercial offerings along the length of that road from the Lee Green crossroads, i.e the site of Leegate, all the way into Lewisham Town Centre and to tell us that they truly believe that vibrancy and arts offerings currently on display along this road is something to be proud of – it quite simply is not. It is a deleterious street in a constant state of entropy and decay.

6.0 So why does any of the above matter in relation to the Section 73 Planning Application that is the subject of this Objection. Well the above matters because the LLP has now been legally adopted by Lewisham Council and they are bound therefore to take decisions in relation to new planning applications having full regard to the contents of their Local Plan. And DC/25/140732 must now be considered in the light of the policies and site strategies set out in the LLP whereas before Lewisham Council were able to ignore those very same ‘draft’ policies and strategies as they were un-adopted at the time of Application DC/22/126997 and its Decision Notice being issued. In doing so Lewisham Council must now review again the heights of tower Block A1 (as now proposed) and B1 along also with Blocks A3, B2, B4 and C1. Buildings A1, A3 and B2 front onto Eltham Road (with the latter building turning into Leyland Road), whilst Building B1 is ‘centred’ within the site, Building B4 fronts onto Leyland Road and lastly Building C1 fronts onto Burnt Ash Road. What each of these buildings have in common is that they either all, or a part of them, reach or exceed the ‘maximum’ storey heights set out in the LLP QD4 Policy which states for Lee Green that: ‘*the maximum height of buildings shall not normally be more than: f. 32.8 metres (10 storeys) to 39.2*



metres (12 storeys) in Bellingham and Lee Green. Figure 5.9 of the same document states for Lee Green (covering both the Leegate and Sainsburys development sites): *'Max 10-12'*. So a 10-storey building is a 'maximum' but so also is a 12-storey building. The Lee Manor Society would read this as 'a main focus building may go up to the maximum of 12-storeys whilst other more ancillary buildings should only go up as far as 10-storeys'. But of course this is open to many different interpretations and both the developer London Square and Lewisham Council will determine their own paths in this regard most likely contrary to the views of their residents – such inconsistency does nothing to help promote 'fairness' across the Borough or even within a single site. This all matters because the Blocks referred to immediately above each reach at least the 'maximum' 10-storeys with Block A1 (the 'focus' building) proposed to reach 17-storeys (plus rooftop plant) along with Building B1 reaching 13-storeys, both buildings being in excess of the 'maximum' storey levels set by the LLP. Buildings A3, B2 and C1 each reach the 'maximum' 10-storeys and Building B4 reaches 11-storeys. Taking 10-storeys as the 'maximum' height all of these buildings reach that height whilst three of them exceed that height (A1, B1 and B4 which exceed the height by 7, 3 and 1 floor respectively). Taking 12-storeys as a 'maximum' Buildings A1 and B1 exceed the limit set by the LLP by 5 and 1-storeys respectively. So very clearly this is not just a matter of a single (focus) building exceeding the maximum height limits set by the LLP for the Leegate site, but is actually three buildings, i.e a group of buildings, exceeding the higher 12-storey maximum level set by QD4 of the LLP, whilst six buildings either reach or exceed the 'maximum' 10-storey level limit (being buildings A1, A3, B1, B2, B4 and C1). In terms of the partially 13-storey Building B1 the Lee Manor Society does not wish to object to its height being above the absolute maximum threshold of 12-storeys because it is set back into the site away from the main site frontages where its impact on the Lee Green crossroads in particular will be far less than those buildings which exceed or meet the maximum heights but which are located right up against either the Eltham Road, Burnt Ash Road, or both.

- 7.0 Within the public consultation held by London Square in June 2025 the developers expressed their view in their consultation document that: *'Following meetings with Lewisham Council and the Design Review Panel, the team have been encouraged to test additional height at building A1. The current proposals would increase the height of A1 from 15 to 18 storeys'*. So let us be quite clear about this – this is a TEST that has been expedited by Lewisham Council and their own Design Review Panel to test Lewisham Council itself into granting approval for a series of buildings (most importantly tower building A1) that exceed the limits set by the Council's own Local Plan, a Plan that was developed and underwent both rigorous independent and public examinations and included the production of technical supporting evidence and engagement with Lewisham residents, communities, stakeholders, and partners. Except that at Lewisham Council's first significant opportunity since the LLP became adopted Lewisham Council are most likely going to ignore their own (and their residents) hard work and approve for development a scheme that blasts a large hole through those policies, strategies and individual site appraisals that make up their LLP. And all for a 'test', and all because a single developer feels that they can take on Lewisham Council and win. No doubt they will.
- 8.0 The LLP QD4 clause C states in relation to the Leegate development site that *'Within those locations identified as appropriate for tall buildings, the maximum height of buildings shall not normally be more than...f. 32.8 metres (10 storeys) to 39.2 meters (12 storeys) in Bellingham and Lee Green'*. So clearly this aspect of the LLP is conditioned by the word *'normally'*. If something is not to be 'normal' then it will be 'exceptional'. Lewisham Council will therefore need to show its residents that exceptional reasons have determined why the Leegate site is an exception to this provision of the LLP and this when Leegate is probably the first significant development site to be



legally required to be reviewed against the newly adopted LLP (July 2025). Housing numbers alone would not suffice to determine the Leegate site as ‘exceptional’ because there are numerous other building sites and developers in the London Borough of Lewisham who could provide (either now or in the future) the additional 14 apartments created by the proposed 2-storey increase in the height of building A1. Indeed LMS would not object if this additional height were to be added to other buildings around the Leegate site instead.

Additionally, the ‘Lewisham Tall Buildings Study Addendum’ document states at clause 2.6.2 that *‘Lee Green is moderately suitable for taller buildings’* – the words ‘moderately’ and ‘exceptional’ do not go together showing to our mind that the Leegate site is suitable only for the ‘normal’ level of development of tall buildings being an absolute maximum of 12 storeys irrespective of Lewisham Council’s approval to the 15-storeys of the extant application. This equally applies from a sensitivity point of view given the proximity of Leegate to the Lee Manor Conservation area and the distribution of listed and locally listed buildings around the development site. The document noted also states at clause 2.6.3 that *‘Developments coming forward within the Lee and Lee Green town centres should provide a transition in scale between low-scale existing buildings and new, taller ones’* which very clearly the Leegate development proposals do not do with the exception of the sites relationship with Carston Close. And at clause 2.6.5 it states *‘Heights in this sustainable and unconstrained location could be expected to rise to a maximum of approximately 12 storeys (39.2 metres)’*, the word ‘normally’ is not used here but the word ‘maximum’ is used.

It must also be said that Lewisham Council’s previous approval of the 15-storey building A1 by way of DC/22/126997 should not set any precedent for the current application because it was approved prior to the Council being legally required to review all such development proposals anywhere within the Borough against the newly adopted LLP which clearly sets maximum heights lower than the previously approved 15-storeys of building A1. To that end an unbuilt building cannot set precedent for another building that itself sits in the same footprint of the same site.

The LLP (on page 86) uses a tall building as its opening image to Policy QD4. This approximately 24-storey building described as ‘Lewisham Renaissance’ is clearly meant to represent high quality design of a tall building in Lewisham and we would not disagree that it holds its own architecturally. But this building had almost no near neighbours and little site context of any meaningful value, was not situated directly on the junction of two main roads and was set back in relation to other public areas. As such the site of this building is of no comparison whatsoever with the Leegate site which is surrounded with context and is tight up against the back of public pavements commanding a prominent position within Lee Green. If the proposed main tower building A1 and side buildings A2, A3, C1 and C2 of the Leegate development become too high then they will destroy the context of the Lee Green crossroads area for generations to come. Lee Green ‘District Centre’ is not and never will be ‘central Lewisham’ and should not be treated (or ‘tested’) as if it is.

- 9.0 Lee Green was noted in 1086 (at the time of the Domesday Book) as being a parish of around 70 inhabitants, being much smaller than its neighbour Lewisham. The parish lay along the Lee High Road and has existed as such for over 1000 years. In all of that time Lee Green has developed slowly and incrementally. As a result it has very few buildings higher than 4 or 5-storeys with the exception of three 11-storey high-rise buildings on the Leybridge Estate (immediately east of the Leegate site on the opposite side of Leyland Road) and of the Merrivale Carston Close 11-storey tower (built on the opposite side of Leyland Road from the Leybridge Estate between 2006-10). Other than these four buildings there is also the 8-storey Firemen’s Tower set behind the Lee Green Fire Station (on the opposite side of the Eltham Road from the Leegate site) and lastly the



8/9-storey Leegate House itself sitting as the main tall building on the Leegate development site, itself constructed in the 1960's.



Birdseye view over Leegate site (to the right) showing both the Leybridge Estate (left) and the Carston Close high-rise building (top centre).

The Leegate site has been loosely described by London's Evening Standard newspaper as '*the worst shopping centre in Britain*'. So over the entire location that is the community of Lee Green only four buildings (because we can safely ignore the Firemen's Tower) create the precedent for the height of the existing Leegate House and all of those buildings (including the latter) were developed in the 1960's from where so many failures of high-rise buildings emanated. And yet we stand at a precipice of building on those mistakes with London Square seeking approval to both 17 and 13-storey tower blocks on the Leegate site. In one foul swoop this proposed development will do more to change Lee Green than 1000 years of incremental history has done. It is worthy of note that the Leegate site is only one of fourteen site acquisitions that have been recently made by the fast growing UAE Abu Dhabi based developer ALDAR (the owner of London Square) since the end of 2023. Aldar and London Square have no interest whatsoever in the 'community' of Lee Green and seek only to profit by way of over-development, a profit that will find its way back to the Middle East rather than benefit the local community in anyway.

10.0 The three buildings that form the Leybridge Estate are set within a Corbusian idealistic landscaped setting realising exactly Le Corbusier's ideal of a Utopian urban development. Corbusier's first urban planning idea of 'aesthetics' sprang from his ambition to create physical environments that would be visually and emotionally satisfying through the application of the principles of harmony and balance. This motivation had emerged from his early training in art and architecture. His second idea of 'habitation' originated in his interest in mass housing from the early part of World War I, when he had soon recognized that it was not enough to design merely comfortable homes, but that access, surroundings, amenities, and location were also crucial to the creation of a satisfactory living environment. These ideals were copied by the designers of the Leybridge Estate but are as far removed from the tight urban setting of the Lee Green crossroads as it is possible to be, where no such ideas or ideals exist in the current architectural proposals. The Leybridge Estate, along with the Merrivale tower building, create the only precedent for 'tall buildings' to be proposed for the Leegate site and yet they are wholly removed in both urban and architectural ideals as it is possible to be. The Leegate site proposals should respond to their own architectural setting, but instead they rely on a vicarious nod to their furthest away neighbours rather than the sites immediate setting. With any knowledge of architecture the Leegate development's



designers would have addressed the architectural setting of its immediate neighbours, those being buildings up to 4-5 storeys high and then moved upwards (height-wise) towards the eastern side of the site rising to address the height of the Leybridge Estate. Instead we have a major 'landmark' building A1 on the Lee Green crossroads where no such landmark building is required and a massing of high-rise buildings A2, A3, B2, C1 and C2 along each side of tower building A1 which together will over dominate both Eltham Road and Burnt Ash Road. This is not a singular high-rise tall building that LMS are objecting to but is actually a group of high-rise buildings. And this is not just an objection of a single high-rise building but is an objection to the massing of high-rise buildings which together will do a great deal of harm to Lee Green in the future to come.

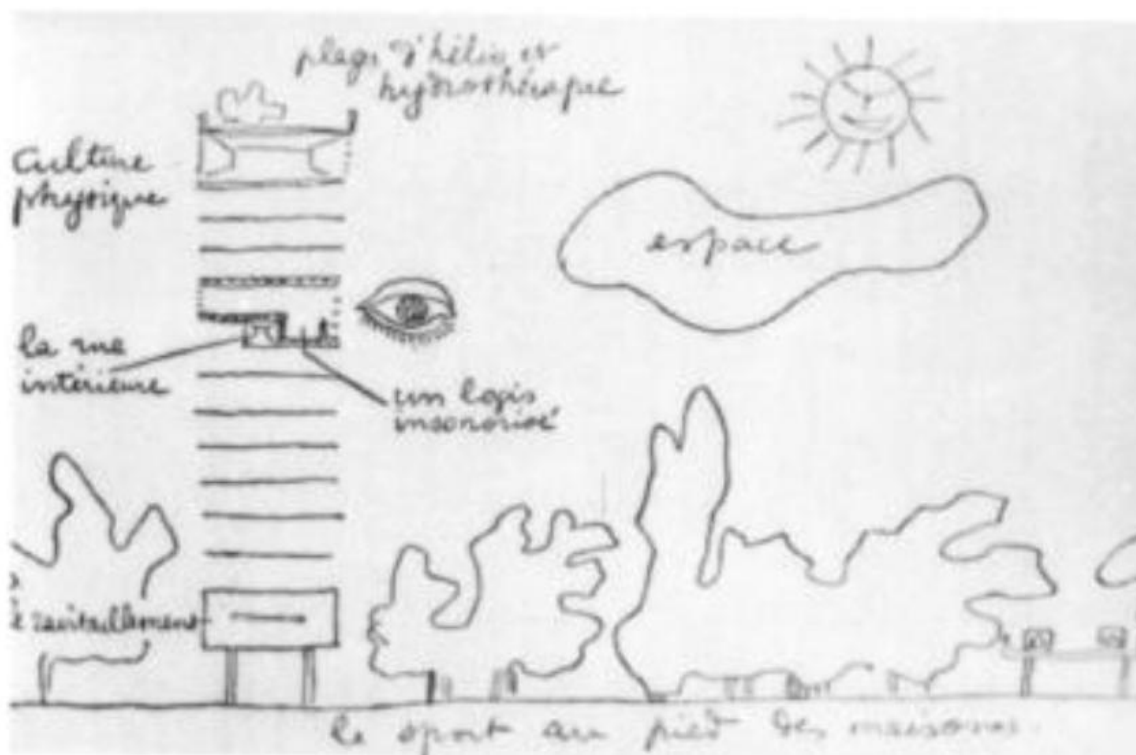


Figure 62

The dwelling in the landscape. This cross-section of the Corbusian city stresses the combination of personal privacy with community and harmony with nature. (Source: Le Corbusier, *The Four Routes*, p. 65.)

11.0 In our objection to DC/25/140113 for the same developer we noted our concerns that the increased height of tower building A1 could affect the skyline when viewed from Blackheath Shooters Hill Road. Our concerns were clearly justified. The image contained on page 112 of the submitted Design and Access Statement Part 9 (DC_25_140732-DESIGN_ACCESS_STATEMENT_PART_9-1397720.pdf) shows clearly that around 9-storeys of the proposed 17-storey building A1 will be visible above the Blackheath horizon. But what we find of particular concern is that as drivers, cyclists and pedestrians move along Shooters Hill Road this view of tower building A1 will pass behind the centrally located church and spire of All Saints Church, Blackheath and in doing so will seriously affect the setting of this church which since around 1857 has been an extremely popular view from across the Heath. Whilst both the high-rise housing developments at 'Kidbrooke Village' and 'Lewisham Gateway' equally appear over the horizon when viewed across Blackheath, neither of those developments affect the setting of All Saints Church because each is at an extreme end of the field of view. But the Leegate



development is not – it will be full square in the vision of anyone looking across Blackheath from Shooters Hill which will very sadly denigrate a view that has been enjoyed for nearly 170-years.

- 12.0 The following text and images overleaf should show to Lewisham Council how London Square have clearly and very obviously tried to provide false imagery within their Planning Application submission, no doubt to try to incorrectly show the impact their proposed 17-storey has over and above that of the currently approved 15-storey building A1. The attached images overleaf are taken from section 4.6 'Height and Massing Studies' within the Design + Access Statement Part 1 (or DC_25_140732-DESIGN__ACCESS_STATEMENT_PART_1-1397711.pdf). We have provided two images – the first being the image as shown within the D+A document noted and the second where we have shown the truth of the proposed increase in height and Massing. Our third image shows a close-up of the second image. (Our fourth image – see below – shows the real current scheme).

The first image overleaf shows the lines of perspective in red created across the front of the proposed tower building A1 at the Lee Green crossroads junction. The pink line around the top of the building shows the 'Consented Massing' of the extant 15-storey building, whilst the blue line shows the 'Proposed Increased Massing' all as set by London Square. The blue line is sadly and very clearly false.

The second image uses the same lines of perspective taken from the first image and extends the Consented Massing by a further two storeys as is proposed by London Square. The additional black lines at the top of the tower building show the true extent of the proposed increase in Massing. The third image overleaf shows a zoomed in view of the top part of Image 2 such that the reality of the situation can be seen. London Square and their Agents are very clearly not being truthful. Whilst it is clear that more and other changes have occurred to the extant scheme than is shown in these images they are correct in principle. The revised balconies for instance are not shown on the image and the recessed 17th floor is equally not shown. But what does matter is that the two sides of the building A1 tower (those that give directly onto Eltham Road and Burnt Ash Road) that extend to the full height of the tower building are correct as shown on our revised image and are simply not correct on the London Square image that was developed specifically to show the impact of such change. And that is why London Square have been untruthful in their submission.

However, there is one further problem with the image used by London Square as shown overleaf and that is that it is not an image of the current scheme as proposed by way of DC/25/140732 – the correct image is shown as the fourth image overleaf. The image used to show the Increased Massing is an image of the previous scheme approved under DC/22/126997. This is despite the fact that the text on the images from the Design and Access Statement refers to 'Consented Massing' and 'Proposed Increased Massing'. However, the principle remains that what London Square have tried to do in providing this image is to hoodwink everybody, including Lewisham Council and all local residents, into believing that the impact of their proposed increase in the height and massing of tower building A1 is a good deal less than it is in reality. That is not acceptable.

(The recreated image overleaf may be modified slightly if each floor-to-floor height of each storey is to be reduced by a small amount but such a change will not make a significant difference to the overall massing).



1. Image taken from section 4.6 of D+A Statement Part 1 showing building A1 looking south-eastwards from Lee High Road



2. Recreated Image showing the TRUE extent of increase in height and massing of building A1 (see below for detail)



3. Close up of recreated Image showing clearly the correct Increased Massing of building A1



4. Correct image of current proposed scheme



13.0 To summarise our Objection to DC/25/140732 we would conclude by saying:

- (a) That LMS along with the residents of Lee Green, including those who were parties to consultation on the draft Lewisham Local Plan, fully expects Lewisham Council to seriously consider the breaches of the tall building height restrictions set out for the Leegate site within QD4 of the LLP and to reject London Square's revised proposals on the basis that there is no over-riding material reason why such an over-height development would be given approval.
- (b) That the significant number of changes to the proposed scheme are clearly not minor material amendments and neither should they be treated as such by Lewisham Council.
- (c) That the proposed increase in the number of residential units are not a result of recent changes to fire and building regulations, but are a direct result of the developer simply believing that Lewisham Council will not hold it to account and will agree with anything the developer wishes to construct irrespective of whether it constitutes over-development of the Leegate site or not.
- (d) That there are numerous 2-bed and 3-bed apartments suitable for families that are proposed above the fourth floor level of all three building groups that are not suitable for families but which they will have little option but to purchase or rent if they want an apartment in this development. Research clearly points to apartments above 4th floor level as being very poor living conditions for such families.
- (e) That London Square's revised proposals are not just about the height of building A1 but are about a group of three buildings each of which has elements of building that either meet or exceed the height limits set in the adopted LLP and as such the proposals should be rejected not just for their overbearing heights but also because of their unacceptable massing.
- (f) That the reduction in car parking for able-bodied residents of the total proposed 640 apartments down to zero parking spaces will create very significant pressure on all other parking areas within at least a half-kilometre radius (and possibly further) of the Leegate site, and which will prevent any type of normal maintenance to those apartments by way of local business people and is therefore totally unacceptable to local residents.
- (g) That the reduction in commercial or non-residential floorspace will further limit local employment opportunities which may now be lower than what the employment levels were on the original development prior to its closure.
- (h) That the scheme submitted under the current application is not that as was publicly consulted on by London Square in their exhibition of June 2025 with the most obvious change being the reduction in height of building A1 from 18-storeys down to 17-storeys.
- (i) That LMS along with many of the residents of Lee Green and with amenity societies that represent the area, fully accept the need for redevelopment of the Leegate site, but believe that such significant works must be carried out with full sensitivity to the local environment and the needs of Lee Green not the needs of the developer to make significant profit over and above what a reasonable developer would seek to make.
- (j) That proposing the over-development of the Leegate site will lead to a future failure of the project similar to failures from the 1960's and 70's where lessons learnt from such developments have been ignored by this developer.



- (k) That in approving this development as it is currently proposed, Lewisham Council will not be helping *'to provide a welcoming place where people will be able to live their best lives'* or *'where generations will not only live but will thrive'*. Leegate will not become a place that people *'want to visit and live in'* but will become an area where they may have little option but to live in if they simply want somewhere to live. It will not become a place where residents will *'choose to stay'* and they will neither *'enjoy a good quality of life or will love living in Lewisham'*. All of that could be the case if the conditions for living were made more tolerable by the developer.
- (l) That Lewisham Council must fairly consider the provisions of both the Lewisham Local Plan, the Lee Neighbourhood Plan and the Lewisham Tall Buildings Study Addendum as they apply to the Leegate site and treat their current residents with the same standards that they claim to uphold in their Preface to the LLP.
- (m) That if Lewisham approves this revised Section 73 application that it is made clear to local residents and amenity groups the basis on which they have done so. Simply quantum of housing units will not be sufficient – there must be a clear and discernible material benefit to Lee Green if the provisions set out in the LLP are to be overridden.
- (n) That there is no precedent whatsoever in Lee Green for buildings of 13 and 17-storeys high. Such buildings will not only sit imposing themselves over their close-knit surroundings but they will do so for many generations to come. As such Lewisham Council must get this decision right and to do so where neither the Leybridge Estate buildings (11-storeys) nor the existing Leegate House building (8-storeys) give sound reasoning to any height for a building over 10-11 storeys and especially not one that exceeds the height provisions of the LLP by over 50%.

Lastly, we asked the question at the beginning of this Objection as to whether the Application in question (DC/25/140732) achieves Lewisham Council's very clearly stated aims or not. Those aims set out recently at the time of adoption of the new Local Plan were that the LLP gives the Council a framework for managing growth, so that it is done sustainably, fairly and follows principles of 'Good Growth'. The LLP must guide and inform the Council. If that is to be the case then the Council cannot and should not throw out the rule book and ignore the provisions set out in the LLP for Leegate. To manage Good Growth means not allowing over-development. Good Growth seeks to build communities not tear them apart and to build them in a way that provides for the sustainability of many aspects of a 1000-year old community. The Mayor of Lewisham has said that the new Local Plan gives the Council the strategic direction and tools to continue to grow the borough in a sustainable and fair way as well as unlocking the opportunities our residents deserve. If that is to be the case then Lewisham cannot and should not over-ride the provisions set out in the LLP that specifically relate to the Leegate site. To ensure Lewisham continues to be a welcoming place, where diversity is recognised and protected Lewisham Council must not ignore their current residents in favour of new ones – all must be brought along harmoniously together in the journey of the development of the Leegate site. And for this particular site within Lewisham to become a place that people want to visit, live in, and where they choose to stay and enjoy a good quality of life and feel supported to achieve their full potential, the Leegate site must be correctly developed not over-developed.

To that end the Lee Manor Society Objects to application DC/25/140732 as it is currently proposed.