

This is the Lee Manor Society's submission to Lewisham's planning department concerning the Leegate redevelopment DC/14/90032. It contains our analysis of St Modwen's planning documents and details our objections to important aspects of the scheme.

Public realm

The documents make frequent references to planning policy requiring good quality public spaces **but fail to deliver.**

The Design and Access statement says (para 1.1) redevelopment will create "a more active and safer public realm." It quotes Lewisham's core strategy (2.2) requiring development to "improve civic space." In 2.5 it describes "the size and format of the footstore is a key design constraint" while the "design challenge is to distribute the remaining footprint to achieve maximum quality for the public realm."

St Modwen shows (p23) a plan indicating the size of their proposed linear square and the original square are equal at 1,400 sq metres. But they include existing public pavement in their calculations and ignore the space provided by the wide walkway through. **Our calculations show the proposed public space is only equal to between one quarter and one third of the existing space.** In 4.9 St Modwen claims "The quantum of public realm provided and the size of the public space are similar to those in the existing development." **This is not true.** For comparison the foodstore circulation area (enclosed Asda space) (ie not the actual shopping area of 3,847 sq ms) amounts to 1,529 sq ms so is larger than the public circulation space (the linear square). (from Planning Statement 3.6)

On p65 St Modwen shows drawings of linear squares at Old Street 22 metres wide, Lee Green 16.4 metres and the south end of Tottenham Court Road 13.8 metres. **Anyone who knows that part of the Tottenham Court Road would not consider it a restful spot. And if Old Street needs 22 metres width to provide acceptable space why does Leegate only get 16.4m?**

Describing the existing shopping centre (Planning Statement 2.15) Deloitte, the consultants, state "Pedestrian routes generally are of good width, level and are well surfaced with tree planting, street furniture and seating areas." **That sounds better than what we are now being offered.** At 2.17 they note Lewisham's Spatial Policy 3 states that "the objectives for Lee Green are to improve civic space and facilitate a more intensive mixed use development."

In 10.12 Assessment against Policy Deloitte for St Modwen state "The layout of the buildings will make the Leegate shopping centre more safe and secure.." **They appear to be achieving this by abolishing any useable public space.**

Under the Transport heading (11.20) Deloitte claims that wider footways on the Eltham Road and Burnt Ash Road frontages "will serve the same function as the existing public open space at the site, housing the market and providing facilities for users of the site to rest and relax." **It is most definitely not the case that wider pavements next to busy roads will provide as good an environment to relax in as the current public areas removed from traffic.**

Later, under Civic Space, Public Realm and Landscaping Deloitte claim (12.12) "The development proposes to include two new civic spaces: a linear public civic space on Burnt Ash Road and a civic space at the Tiger's Head junction." **As previously noted the linear square is**

too small and too close to a busy main road while the crossroads junction (also small and polluted) already exists. St Modwen are adding nothing.

At the Lee Green crossroads corner public realm works include “Special treatment to the south-eastern corner of the Tiger’s Head crossroads.”(10.21) **This involves the removal of 13 existing established trees (as well as seven trees on the existing square and along Leyland Road.)** There are plans for a large “feature tree.” There are also plans for installation of items of “useful street furniture.” This would include a clock, a drinking fountain, as seat (there are existing seats) and perch (for birds?) and “the repositioned notice board.” This latter presumably refers to the Lee Manor Society’s heritage panel installed with Society and Assembly funds a few years ago. **The Society would expect to be consulted on the removal, storage and re-siting of the panel if this is to go ahead but we see no need to remove it. All these works at the corner appear excessive. In addition, the corner frontage of the landmark building appears very ordinary and far from the quality claimed by St Modwen.**

In 2.4 St Modwen claims “at third review the [design] panel were satisfied with the further development of the project.” **There is no evidence of this** in 10. Supplementary information pages 122/123. At first review the design panel says “Approach to public realm unacceptable given scale of city block. Mall space unclear.” St Modwen’s response is “Extensive optioneering of public realm distribution taking this into account.” **It is not clear what this means.** At second review the design panel says “Further work required to define private, communal, public realm and amenity space.” St Modwen’s response to this is “Refinement and clarification of overall strategy.” It then refers to the podium units, amenity space of the duplexes and the town house roof terraces. **There is no mention of ground floor public realm. There is a confusion here between the secluded housing areas and the real public space at ground level. This confusion is strengthened by drawing (7.2 page 63) where the private podium space could be seen as public space.**

There appears to be further confusion at 7.28 Public Realm, Communal Garden, Allotments and Play Space where there is talk of “The high quality public realm strategy” with “the provision of civic space, public realm and private communal gardens at ground and third floor level, [providing] a variety of meeting and play spaces.” **There appear to be two communities described here, a privileged one on third floor level and a disadvantaged one at ground level. There appears to be no connection between the flat dwellers and the local community. This will be a gated community in the sky while locals sit in choking traffic fumes in the tiny linear square below.**

St Modwen claims (p21) that “the perception of some consultees that a centrally located public space would be preferable.” **We have never said this. We have accepted from the outset Burnt Ash Road was a better location of any square but the size currently proposed is totally inadequate.**

We have argued from the outset that Lewisham has in place clearly worded policies* in its Core Planning Document that require high quality public spaces in town centre developments and specifically in Lee Green. The current proposals from St Modwen fail to meet these requirements and should be rejected. Express written policies put councils in a much stronger position should an applicant take a scheme to appeal.

*Lewisham’s Core Strategy Development Plan Document states: “The emphasis within the District town centres will be to protect the existing open spaces from development ...Publicly-accessible open or civic space will need to be provided where major development is proposed.” (3. Climate changes and environmental management 3C Open space and biodiversity (p65).

Spatial Policy 3 District Hubs (p63) Lee Green 1 sets as an objective: “Improve civic space and facilitate a more intensive mixed use development on the shopping centre site..”

Massing

Existing heights of buildings at Leegate are eight-storey offices on the corner and five-storey flats elsewhere. The proposal (D&A 6.4) is for a 10-storey “landmark building” on the corner and eight storey flats elsewhere.

The Environmental Statement, Non-Technical Summary measures the Leegate Heights against existing quite distant features. “Likely effects around the site will be on local townscape and routes through and connections beyond the site.” (9.4) “The view from within Manor Park (they mean Manor House Gardens) is from the Grade II listed historic landscape and shows the worst position on its west side. The top two floors of building C (the landmark building) will be seen between gaps in the mature trees.” However “it will be a rare addition to the skyline and will cause minor harm.” **We regard these assessments to be irrelevant. The damage caused by excessive height and massing will be very local, at street level at the crossroads and surrounding streets.**

In reply to a Greater London Authority letter Deloitte state (4.11) “Urban design: The building is acknowledged to be larger and bulkier than the surrounding context but its town centre location is considered an appropriate place for this scale of development.” **We do not agree.**

In the Planning Statement Deloitte state (10.19) “The landmark building at the crossroads is proposed at 10 storeys, which is a similar height to the towers to the east.” **Once again, this comparison with Leybridge Court is irrelevant. The Leegate buildings are right on the street.** Earlier in the same document, Deloitte’s own description of Leybridge Court (2. Site Context), states “Leybridge Estate lies to the immediate east consisting of tall buildings set in a mature landscape.” **Set back among mature trees the Leybridge Court flats do not have the same oppressive effect as the landmark building at street level.**

At 10.18 Deloitte states that the planners and the design panel found the proposed massing of the buildings to be “optimal.” One aspect that appealed to the planners and the panel was the reduction of the height of landmark building by one storey to 10 storeys. Yet in guidance to St Modwen provided in a letter dated May 3 2012 the planners say:”You have provided an illustration within your submission showing indicative massing for buildings on site (2-8 storeys). In principle given the context of the site surroundings it is felt that the site could be capable of accommodating buildings of this scale.” Yet in a second guidance letter to St Modwen from the planners (July 31 2014) “The northern tower fronting Lee Cross [the crossroads] would be 11 storeys in height and would be the ‘feature’ tower. Six, eight-storey towers would flank the west and north eastern and east of the building. The scale and height of the proposed development is generally supported.” **So, having started low, St Modwen have increased the heights to an unrealistic level and then reduced them to the level they wanted in the first place – 10 storeys.**

Traffic

The Framework travel plan shows the present breakdown of means of getting to Leegate and the target figures after 5 years. Figures are percentages (other modes take totals to 100 per cent)

| | Now | After five years |
|--------------------------|------|------------------|
| Single occupancy vehicle | 42.9 | 40 |
| Cycling | 2 | 2.5 |
| Walking | 24.7 | 27 |
| Public transport | 19 | 22 |

The increase/reduction targets can be expressed as percentage changes – down 6.8 per cent for single occupancy vehicles and up 9.1 per cent for walking. But the percentage point changes - 2.9 and 2.3 respectively - are small and the overall changes are minor. **The reality is that this supposedly sustainable development does almost nothing to change traffic volumes.**

In 6.3 p26 the document states: “A high quality pedestrian environment is fundamentally important in enabling people to walk.” This is to be achieved by “widened pedestrian links to Burnt Ash Road and Leyland Road, a new pedestrian crossing near the car park access, relocated and enhanced crossing on Burnt Ash Road and enhanced TfL crossings at the cross roads.”

At 2.7 the document quotes Lewisham’s core strategy No 9 “Provision will be made to ensure an accessible, safe, convenient and sustainable transport system for Lewisham that meets people’s access needs while reducing the need to travel and reliance on the private car.” **It is not clear that a development that leaves car use almost unchanged after five years meets these criteria.**

At 6.7 Trip generation

The document states “Up to 95 per cent of all trips to new food stores [ie generally, not just at Leegate] are existing car trips already on the highway network.” However, paragraph 7, Trip distribution, shows most cars will approach Lee Green from the south along Burnt Ash Road, generating most congestion and pollution on the side of Leegate where St Modwen propose their “linear square.” The traffic breakdown is: 41.9 per cent from Burnt Ash Road, 18.7 per cent from Eltham Road, 21.3 per cent from Lee Road and 17.6 per cent from Lee High Road.

In London and specifically Lewisham and Greenwich traffic volumes have fallen, according to generally accepted traffic measurement data. At 8.2.2 Fig 8.1 shows London traffic fell 10.9 per cent between 2000 and 2012. In Lewisham traffic fell 12 per cent and in Greenwich 5 per cent.

Traffic on the A20 Lee High Road/Eltham Road peaked at 30,000 vehicles a day in 2002/3 but by 2012/13 was 50 per cent down at 15,000. Traffic flow on Burnt Ash Road/Hill, the A2212, “has shown a steady decline since 2007,” the document states. Figure 8.5, p 56 does indeed confirm this but the data shows a fall from 27,500 cars a day in 2007 to 19,000 in 2013. **Burnt Ash Road is now busier than Eltham Road despite Burnt Ash Road having more the character of secondary road while Eltham Road is a main transport route between central**

London and the Kent ports. Burnt Ash Road is not the obvious road to take the bulk of the new supermarket traffic or to site a narrow “linear square.”

St Modwens’ Environmental Statement Vol 1 under 8 Air Quality 8.32 says: “The proposed development is forecast to generate 6,000 additional two-way vehicle movements per day into and out of the foodstore car park and service area. This will lead to an increase of almost 4,000 vehicle movements a day on Burnt Ash Road.”

Under 9. Highway Impact Analysis St Modwen agrees to re-survey the Lee Green crossroads for traffic volumes after the already proposed pedestrian crossover changes by TfL. Section 106 funds (from St Modwen) will be available for any further improvements that may be needed while “further minor road widening could be provided if required to ease flows.” **So if traffic is heavier than expected we may see a further erosion of pavement widths at the crossroads. This would be on top of the slices already being taken out of pavement widths by the recessed bus stop and the loading bays for the independent shops. The “linear square” will be even less of place to stop and relax.**

At 13.1.8 St Modwen and its advisers conclude “The modelling exercise concluded that traffic associated with the proposed development is not the material factor affecting performance of the highway network.” **Even if this is true the impact on the environment for pedestrians and shoppers will be considerable.**

St Modwen’s proposed mitigation measures and traffic plan do not appear to be substantial or convincing. Under mitigation it refers to pedestrian and cycle links, a travel plan to encourage non-car travel and additional trees. Its travel plan comprises welcome packs, notice boards, a Toucan crossing on Burnt Ash Road, signage boards, way-finding signs, bike parking, better cycling and pedestrian links through the site. **This seems to rely on an awful lot of boards and signs to change behaviour.**

Parking volumes expected at the new superstore also appear to pose a problem. Table 10.2 p72 shows that the 320-vehicle capacity rooftop car park will be adequate in the week but on Saturdays there will be too many cars looking for a space. Between 10-11am on Saturdays 375 cars are expected to be looking for a space rising to 394 between 11am-noon and only slightly lower at 383 between 1-2pm,

At 10.1.2 St Modwen explains that: “The availability of car parking would restrain the number of car trips made at any particular time, especially as there are not practical alternative car parking options available for food shopping.” **So drivers are expected to know by telepathic means that there are no spaces available and stay at home or go to another store. What is more likely is that they will drive round Lee Green further congesting local streets and generating more traffic fumes. This does not appear a sustainable policy or one that benefits the area.**

In summary, the proposed development does almost nothing to justify the “sustainability” label. Car use will barely dip; there will be additional traffic on the busiest local roads; pressure on parking will increase the number of shoppers cruising around looking for a parking space while if traffic does not flow as smoothly as the optimists expect, St Modwen can take further bites out of our pavements.

Pollution

St Modwen and its consultants arrive at very positive conclusions relating to pollution levels in their Environmental Statement. In (6.3) Traffic and Transportation they state that: "The environmental effects of the proposed development are judged to be minor beneficial on: pedestrian amenity with the vicinity of the proposed development compared to today; and accidents and safety around the junction .. compared to today. All other traffic-related effects were judged to be negligible after mitigation" **This seems hard to believe.**

Under Air Quality the report states (7.3) "The assessment of emissions from additional road traffic during construction and the operational phase .. indicate that the proposed development would lead to no more than a small increase in concentrations of nitrogen oxide and imperceptible increase in PM10 [particulate matter up to 10 micrometers diameter concentrations] at relevant locations. .. For consideration of annual mean nitrogen dioxide concentrations, the residual effects are described as minor adverse at existing receptors and negligible at all other locations. The residual effects for PM10 are predicted to be negligible. The proposed development is unlikely to affect the implementation of the air quality action plans put in place by Lewisham and Greenwich." **We note that for every 10 micrograms per cubic metre of air (ug/m3) increase in PM10 the lung cancer rate rose 22 pct (European study). No reference is made in the study to PM2.5, smaller particles that are particularly deadly.**

It is hard for us to argue against the highly technical assessments that have been carried out but the volumes of traffic generated by the centre cannot but lead to increases in already high levels of emissions recorded on local streets. We have heard the argument that no development would take place in London at all if pollution levels were taken into account. This is no consolation given the large number of shopping trips the new store will generate over a wide range of streets.

Trees

The Arboricultural Survey (pages 11-13) categorises trees at Leegate according to type and condition. Trees on the Burnt Ash/Eltham Road corner and along Eltham Road are rated C – "poor value." **They are smaller varieties – privet and ornamental pear – but it is not clear why they should be rated poor value.** St Modwen proposes removing these trees and planting new ones. **All the trees are rated for their "arboricultural value" but none are rated for their "cultural or landscape value" which, as the document explains, are additional ways of rating trees. Some people might feel these were important values to take into account. We accept with regret that moving the public space to the Burnt Ash Road side of the site will mean the loss of the mature London planes on the existing square but we question the need for the wholesale removal of the trees around the edge of the site. With one exception all have 20-plus remaining years of life and some have 40-plus years left. We note that parts of the pavement of the south-east corner of the Lee Green crossroads are St Modwens' ownership (land title plan p8 of Development Delivery Strategy) but we do not feel this gives the company the right to remove them.**

Conclusion

St Modwen has worked hard to improve aspects of its development proposal but, we believe, still fails on the fundamentals. Despite agreeing to wholesale redevelopment of the site, in theory allowing a coherent, comprehensive approach, it has still failed to provide enough high quality public space. There is little from 1960s town planning or architecture that we remember with affection. But the construction of Leegate in that decade did provide a large amount of protected public space, away from busy main roads. After initially arguing that housing did not make commercial sense, St Modwen has now packed in so many dwellings that the development has become massive and overbearing, threatening to change the character of the Lee Green crossroads for ever. The key constraint, acknowledged by St Modwen, is the size of the proposed superstore.

- We believe that a more imaginative approach to the internal design of the store, possibly moving some back office functions to a first or mezzanine floor – examples do exist on other locations - could free up space at ground level for a genuine square that cuts further into the site to give a larger area of space protected from the busy main road. This could in turn allow an open public walkway to run from the square through to the Leyland Road/Eltham Road corner. There is little in the proposed scheme to shift behaviour from car-borne shopping or mitigate its effects. We feel the least the developer could do is to provide the local community with a decent area of public space, not a strip of pavement that has to accommodate unloading bays, market stalls and trees as well as seats for coffee drinkers and weary shoppers.**
- We believe that a redistribution of the apartment buildings over the site, away from the street frontages, would reduce the overbearing, cliff-like appearance of the development.**
- We object to the scheme in its current form and urge the planners to hold further discussions with St Modwen to improve their proposals. Should St Modwen insist, we believe Lewisham has robust enough policies expressed in its core planning policy documents to win should an appeal be launched. We hope it does not come to this.**

Lee Manor Society March 2015

Charles Batchelor Chairman 105 Burnt Ash Road, London SE12 8RA

Tel 07785 952676