

August 2022

## **Galliard's planning application to redevelop Leegate centre (DC/22/126997): Overview of responses from members of Lee Green Assembly's Steering Group**

This briefing provides an overview of the various responses submitted by members of Lee Green Assembly's Leegate Steering Group to the Galliard plans for the regeneration of Leegate, long-neglected but a Public Transport Accessibility Level (PTAL) 3 District Hub at a major crossroads with considerable potential for the local community.

While many of the proposals are welcome and improve on earlier applications, there remain flaws which significantly undermine the potential benefits. This summary merely highlights main issues raised by our members, including Lee Manor Society, Lee Forum, Blackheath Society, Caroline Mayow of Lee Green Lives, and Leegate Traders' Forum. **It is important to look at the greater detail in those individual responses, and we would encourage you to do that.**

### Pros

- **Big increase in new homes** (36 to 563), contributing significantly to Lewisham's target
- **35% affordable housing** by habitable rooms (30.7% or 173 of the actual new homes), a considerably higher percentage than achieved across Lewisham in recent years
- Re-provisioning of **commercial/retail and community space**, more consistent with demand
- **public square** facing onto Burnt Ash Road and new street on Carston Close boundary

### Cons

- **Height** exceed guidance and **massing** will dwarf surrounding area, including nearby heritage buildings, setting an inappropriate precedent for area against emerging policy
- **Density of development** exceeds guidance for PTAL 3 District centre, such that number of new residents will overwhelm already stretched local infrastructure and services
- **High proportion of single aspect units**, against guidance and increasing challenges for ventilation and thermal comfort in face of climate change and extremes
- Lack of clarity on whether development will comply with latest Building Regulation requirements for **energy efficiency and sustainability**, in face of Climate Emergency
- Lack of credible **continuity plan for existing businesses and community organisations**
- **Loss of mature trees** and concern on quality/suitability and location/visibility of new planting
- Little evidence that **consultation concerns** of local residents and businesses (including in nearby Royal Borough of Greenwich) have been addressed in submitted application

Our suggestions, therefore, are intended to improve the plans. As they will impact on a much wider area, including neighbouring Blackheath residents and district centre, and nearby Greenwich residents, the Council will need to ensure that views in these areas are also taken into account.

**We believe there are grounds for rejecting this application. However, if it is approved, we believe strong conditions are needed to ensure its adverse impacts are mitigated.**

### **Height, scale, massing and density**

The heights of the buildings at the NW crossroads corner (15 storeys) and SE corner (13 storeys) are above the 12 storeys, as recommended in the Draft Tall Buildings Addendum to the Lewisham Plan – currently being revised – and as required by the London Plan. They are also bunched together, so do not compare favourably with the nearby Leybridge estate buildings (11 storeys), which are separated by considerable landscaping. The heights, if approved, would set unfortunate precedents for districts hubs, the character of which should be distinctly different from town centres. The heights would also impact on available light for residents and sightlines will project an overshadowing of the square.

Furthermore, the density of 563 units is significantly more than 450 in the Site Allocation plan.

### **Design quality**

The units themselves are of varying sizes (though 83% have 2 or 3 habitable rooms) and, although they meet legal requirements, are not generous in size. Largely because of the density of the development, 42.5% (a high proportion) are single aspect, which is not ideal for ventilation, daylight, privacy and thermal comfort. Mayor of London guidance say that “All new dwellings should be dual aspect, unless there are exceptional circumstances that justify the inclusion of any single-aspect homes”. The current scheme’s design needs more contrast in height, setback and façade with balconies and windows of differing design to relieve the tedium and provide more dual aspect units.

### **Carbon footprint, sustainability and energy efficiency**

A considerable amount of extra traffic will be generated, which it is claimed can be accommodated by the service access arrangements and car parking. With controlled parking zones (CPZs) anticipated in neighbouring streets, there is almost certain to be an increased carbon footprint. Furthermore, at a time of Climate Emergency, there will need to be conditions attached for at least the 30% greater efficiency in energy performance as stipulated by new Building Regulations in force from 15 June 2022. The Council needs to satisfy itself that these new, more demanding requirements will be met.

### **Public Realm**

As stated, the plan for a public square is welcome. However, the additional planting will in reality be impaired by the lack of lighting. Furthermore, the loss of three London Plane trees – currently protected by TPOs – won’t be overcome by the extra number of small “canopy” trees.

### **Heritage**

The solid blocks along both Eltham and Burnt Ash roads are unremittingly solid and run completely contrary to the local character (some of it historic) of buildings in the immediate vicinity – Old Tiger’s Head, Lee Green Fire Station, etc. – which will not be enhanced by the development, nor much of those homes and other buildings in the nearby conservation areas of Lee Manor and Blackheath, and valuable local parks.

### **Retail and economic regeneration**

The London Plan focuses on the need to consolidate viable functions, including retailing, leisure and workspace. Lewisham Council has also made great efforts to sustain small and medium-size enterprises across the borough, particularly in District Hubs. Galliard has been relatively supportive of existing traders, who have had to overcome changes in shopping patterns and Covid. However, more loyalty now needs to be extended to them, by building them into the planning and delivery process. The lack of a service delivery yard will cause traders considerable difficulty, as well as contributing to traffic disruption.

The lack of a meaningful strategic retail plan by Galliard makes this difficult to implement. Currently, Leegate Traders Forum estimate over 250 FTE jobs use the site as their main place of work with more than 1000 when indirect employees are factored in (most notably by Eleanor Care). Terms have yet to be outlined under which they can take advantage of the redevelopment that reflect the major contribution they have made to keeping the centre going.

### **Wider Community: the impact on local infrastructure**

An active local community has contributed much to the area, through the Local Assembly and a Consortium of 16 local groups, whose support for residents range from supplying household necessities, activities for older people, overseeing the local parks and advocacy for people in need. The Traders’ Forum represents local business and charities operating out of Leegate.

In addition, Lee Forum has put considerable effort into developing the Lee Neighbourhood Plan, now complete and awaiting approval.

All of these groups accept that something needs to be done, and have devoted considerable thought and energy working with developers over a succession of plans. While welcoming aspects of the latest plans, our concern is that they still don’t reflect many of our constructive suggestions

and will heavily exceed the capacity of the local infrastructure, undermining the social cohesion that so many have worked to create.

This, in turn, raises a further issue, namely, that the height of the buildings and preponderance of smaller units works against housing sufficient numbers of families and older people that will allow for the scheme to accommodate a representative demographic in line with the wider population.

And, if the application is agreed, the Council will need to ensure that sufficient resources – through funds such as the Community Infrastructure Levy (CIL) – are devoted to the existing and growing burden on local health and social services, and schools. In addition, the S106 funds need to accommodate a big community gain to meet additional social need generated by the looming Cost of Living crisis.

### **Consultation**

For such a large development, the latest consultation was too brief, particularly as it took place over the summer months. In addition, while acknowledging that there were strong views over such issues as the height of Building A1, the suggestion in the Conclusion to Kanda's Statement of Community Involvement that 59% respondent concern represents a low level of local resident concern is risible. It is essential that the next stage of (statutory) consultation is effective and meaningful, and includes face-to-face as well as online interaction.

### **Implications of timeline for construction**

The anticipated timescale of the development, estimated at 7 years (Oct 2023-Oct 2030) will introduce severe disruption for the local area for the construction period and even greater insecurity and uncertainty for existing businesses, charities and community groups which have invested so much time and energy into keeping Leegate going. **The Council will need to impose strict conditions to ensure minimum disruption, including restricting construction traffic routing and hours, and stipulate guarantees that will allow existing business tenants to survive during the interim and negotiate viable conditions for their return.**