

Emma Talbot  
Laurence House  
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Catford  
London SE6 4RU

7<sup>th</sup> August 2007

Dear Ms Talbot

**LEWISHAM GATEWAY PLANNING APPLICATION Ref: DC/06/62375/X  
OBJECTION FOLLOWING SUBMISSION OF SUPPLEMENTARY MATERIAL ON  
30<sup>TH</sup> JUNE 2007**

We are writing to you as the core committee of the Lewisham Gateway Action Group. We submitted a full objection, with a one page summary on 11<sup>th</sup> June. On July 26<sup>th</sup> we requested that the second phase of consultation be stopped until the full, required data was available. We reiterate all the points in the objection of June 11th and highlight the following:

**Detailed planning permission for the roads and rivers should be refused because:**

a) Traffic congestion is proven to get worse. Traffic speeds through the area of the site will decrease by 20%, causing still greater increases in tailbacks along approach roads. Loampit Vale, already close to saturation point, will be especially affected, although the models still do not take into account the other developments planned for the area and recently agreed by the Council, namely the new school and swimming pool, let alone all the development envisaged in the Area Action Plan.

It is urgent that a cumulative assessment be made of all future transport needs for central Lewisham *before* any specific permission is granted for the proposed changes to the road layout at the Gateway site. We consider it unacceptable to submit data which is still not shown to comply with the requirements of TfL.

b) No viable strategy exists for encouraging greater use of public transport, even though the developers themselves pin their hopes for the Low H on such a 'modal shift'. There are no segregated cycle paths, bus lanes peter out at various points, and no new extensions to the DLR or tramlink can now take place. Increased numbers of buses are described in the supplementary material as 'aspirational' only. There is insufficient capacity on the trains to cope with the additional 5,000 plus residents planned for the immediate area, most of whom the developers expect to be commuters. Unrealistic and out-of-date data on rail capacity is still being used in the Supplementary Transport Assessment.

c) Air quality will deteriorate as a result of the operation of the proposed road layout. The data submitted shows that concentrations around the site will increase by up to 4%. Again, data on this remains unreliable while the traffic model and the impact on traffic flows is unverified. The estimates on air quality in the 'Environmental Statement Addendum' Appendix E do not appear to take into account increased congestion along approach roads which must result from the decrease in speed established in the 'Supplementary Transport Assessment'. The area is in an Air Quality Monitoring Zone, and air quality already breaches EU guidelines. A town centre park, new residential housing, a major new school, as well as open food stalls are immediately adjacent. In regard to these sites, air quality figures are given only for the school, and these show a 14% increase in the number of exceedences within a 24 hour period.

d) The Low H road layout remains deeply controversial. It was adopted without properly considering the alternatives, especially as regards the comparative impact of these on air quality and other environmental factors. In adopting the Low H, Urban Renaissance Lewisham appears to have contravened EU directive 97/11/EC of 3 March 1997 paragraph 7 (3) which states that *'information to be provided by the developer in accordance with paragraph 1 shall include at least ....an outline of the main alternatives studied by the developer and an indication of the main reasons for his choice, taking into account the environmental effects.'*

There was no proper traffic modelling done for alternative layouts, no estimates of air quality in different scenarios, nor of the development of additional sustainable transport solutions for the area. Information given to the public when they were asked to choose was incomplete and different from the current proposal.

e) Pedestrian routes around the site are 'pinched'. Connections between buses, DLR and rail are currently rated as very good and this development makes no improvements to this rating. However, with the development, it will take pedestrians longer to go from the stations to bus stops for buses out of Lewisham and gaps between some bus stops are increased. Claimed savings of 20% in pedestrian journey times between transport nodes within the Gateway (para 10.11 of the Environmental Statement Non-Technical Summary) are not substantiated in Table 8.1 of the Supplementary Transport Assessment.

Improvements in pedestrian connectivity and the overall pedestrian environment is one of the key objectives of the 'Development Brief'. Not only will routes be crowded but air quality will be worse especially at some bus stops while, as a result of the high-rise development the site is 'excessively' windy in key retail and leisure areas: sunlight and daylight within the site has not been modelled at all.

f) Rivers are not naturalised, and, in violation of all guidelines on culverting, the Ravensbourne is pushed completely underground for 40m. The effects of this on wildlife habitat have not been assessed in the application. A major opportunity for making the most of the confluence of the two rivers as a unique element in Lewisham's identity will be lost forever.

g) Flooding and drainage remains a concern. The area falls in the Environment Agency's 1 in 75 year event indicative flood plain, but the models used by the developers test only for a 1 in 100 year event. Figures for surface water run-off do

not appear to have taken into account the loss of 72% of the current green space which the development involves.

**We also urge the Strategic Planning Committee to refuse outline planning permission for this application for the following reasons:**

a) To submit outline planning application for tall buildings is contrary to all existing guidelines – in the London Plan and those published by CABI and English Heritage.

b) Claims that the development will lead to ‘regeneration’ are false because:

- Job creation is minimal and incorrectly cited in the documentation.
- “Affordable housing” is well below any guidelines and is not guaranteed but will be made dependent on the developers’ profit levels.
- No social, rented housing is provided
- The Council refuses to make an estimate of the impact of the scheme on existing traders and the street market. This appears to contravene EU directive 97/11/EC which requires that a description be provided of the “material assets” “likely to be significantly affected by the proposed project”. We reiterate that a retail impact assessment should be made, as it is difficult to see how a development of this size would fit within any town centre without ripping out its heart. Until we have better estimates of the impact of the new retail provision on existing retail provision we will not have a clear idea of the overall economic costs and benefits of the scheme.
- All other amenities are subject to a profit being made from their provision – ‘market favourability’. Given the huge and rising costs of the development, profits will need to be very high to secure their provision. At a time of uncertain economic trends this makes the whole project financially risky for the developers, Lewisham Council and the people of Lewisham.

c) The supplementary material makes clear that economic benefits will not accrue from this development at all but from the further investment it may or may not encourage. However, it should be noted that further investment will magnify all the negative effects detailed, but these have not been addressed. Positive benefits are purely speculative while, as the next paragraph shows, negative impacts are real and significant.

d) In addition to the traffic gridlock and loss of open rivers the following major negative permanent impacts will obtain (italics indicate quotes from the application documents):

- *“Increased noise level as a result of the operation of building services plant;”*
- *“Noise levels would put development in NECs A-D for which planning permission would normally be refused;”*
- *“Without development annual mean limit for NO<sub>2</sub> is likely to be exceeded in 2012. The development will further enhance these levels by up to 4%. No mitigation measures available other than.... measures to encourage to sustainable modes of transport.”* But para (b) above shows there have not actually been provided. Increase in pollution levels is a basis for refusing planning permission;
- Windy conditions created by high-rise blocks in the maximum scheme means that *“to the north of block A, in Confluence Place, along the main retail area between blocks C and D and along Rennell Street, conditions*

*would no longer be acceptable for their intended use* “. This uncomfortable pedestrian environment is against all the intentions of the development and makes refusal of planning permission for the maximum scheme imperative.

- Loss of green space and Metropolitan Open Land specifically protected in Lewisham’s UDP, Local Development Framework and the London Plan.
- Likely de-watering of Palaeolithic deposits and burial ground and removal of pre-historic stone which was the foundation stone of the Lewisham medieval bridge;
- *“Urbanising effects at night time likely to give rise to generally adverse effects”*
- There is loss of views from all the surrounding areas; and conservation areas and a listed building are overshadowed and their surroundings blighted.

e) The new ‘Outline Planning Energy Statement’ shows that the crowded, high density development on the site inhibits the use of certain types of renewable energy such as wind turbines and solar photovoltaic cells. The scheme fails to address the urgent need not just for reduced carbon emissions, but for carbon neutral development – the developers give a nod in the direction of environmental concerns rather than making these intrinsic to the conception;

In conclusion, in spite of all the detail submitted in April 2006 and June 2007, there is no indication that the application addresses the aspirations expressed by Lewisham people in 2002, nor those stipulated in the Development Brief approved by Urban Renaissance Lewisham.

Details on these points can be found in our objection of 11<sup>th</sup> June 2007. We reiterate our concerns expressed in letters to John Miller on 26<sup>th</sup> July and 6<sup>th</sup> August that this application has gone out to public consultation while lacking required information, for instance on traffic flows, rail capacity and air quality.

Yours sincerely

Lewisham Gateway Action Group