



28th September 2017

For the attention of the Mayor of London
City Hall
The Queen's Walk
London SE1 2AA

Dear Mayor,

We are writing to you to ask you formally to call in the application heard by Lewisham Strategic Planning Committee on 27th September 2017, regarding the Old Tidemill School site:

**LAND SOUTH OF FRANKHAM STREET: SE8
DC/16/095039**

<http://councilmeetings.lewisham.gov.uk/documents/s52440/Tidemill%20Strategic%20Committee%20Report.pdf>

This area of land, owned by Lewisham Council in south Deptford became vacant when the Tidemill School was relocated to Deptford Lounge in 2012. In the late 1990's the school playing field was transformed by Deptford Discovery Team, Groundwork UK in consultation with teachers, parents, children & the local community **using public funding**. Since then, Assembly SE8 and the Friends of Old Tidemill Wildlife Garden have opened up the school garden to run gardening, forest school classes, art events, film screenings, pond activities, corporate responsibility days and a wildlife gym and music events.

Deptford Neighbourhood Action (DNA), the designated Neighbourhood Forum for the Area, met with the council in 2015 to talk about plans for this piece of land with the aim that the garden would be incorporated into plans being produced at that time, **because the plans were still being drafted**.

We were hoping that the Council Planners and Developers would re-draft their plans based on our discussions and as per the Council's Open Space Policy, Theme 7 which states that the Council will work closely with Neighbourhood and Amenity groups to ensure the protection and enhancement of open space.

During this time the community with DNA's support put forward **alternative plans** created by a graduate of the Royal College of Art, were put to the Council and the Developer at this time which would have **met the housing requirements** and yet still **retained the existing social housing and Garden**.

We asked the Lewisham Council Strategic Planning Committee to reject this planning application which is of poor quality, lacking in vision, integrity and social value on these main specific grounds:

- **Unwillingness of the Applicant and the Council Planners to work with the community to develop a planning application which meets community need.**

DNA, the Deptford Society, Crossfields Residents Association (Frankham House is part of Crossfields which sits next to this site) were not engaged or consulted in any meaningful way on the production of these plans.

Phil Church of Sherry Green Homes, is on record as saying that: *“the developers were not legally bound to engage with the community and create spaces that work for the community.”*

This (and we have many other examples) demonstrates the total lack of respect and willingness to work with the community that has surrounded the development proposals for this site.

The community are not anti-development – we want to see redevelopment on this site which is **appropriate**; the application put before the Strategic Planning Committee was **inappropriate and non-compliant with** a whole host of policies (see attached), the most important of which is Theme 5 of the Council’s Open Spaces Policy that aims to protect and enhance green space from inappropriate development and states:

“It is paramount that open space should not be built on or developed without an up to date assessment proving that the land is surplus to requirements.”

Even as of today, the Deptford Town Centre regeneration page has no detailed information or links to the planning portal regarding the proposals, the loss of green space, or any consultation regarding these plans. See link:

<https://www.lewisham.gov.uk/inmyarea/regeneration/deptford/deptford-centre/Pages/Improved-housing.aspx>

Unlike Crossfields Open Space:

<https://www.lewisham.gov.uk/inmyarea/regeneration/deptford/Pages/Crossfield-open-space-.aspx>

- **The Uniqueness of the Garden – it’s genius loci (distinctive atmosphere and it’s spirit of place)**

Old Tidemill School Wildlife Garden is 2,400 sq m of unique nature wildlife garden for everyone in the local community. It has two unique Indian Bean Trees (*Catalpa bignonioides*) which were planted over 20 years ago by a local resident and are about 65 feet high; combined with newts in the ponds; foxes; butterflies; stag beetles; over 70+ trees and bird life etc. form a diverse ecosystem, which is part of the Green Grid (see 7.230) ensuring biodiversity within the area.

This garden is so unique that the Council Officers and Developers who offered to find a replacement space of equal or better quality and social value to compensate for the loss of the garden have failed to do so.

Instead they have ‘offered the community’ an existing piece of public realm for growing vegetables etc, which is about one sixth of the size of the garden and is a piece of grass of low amenity value. It is situated next to a roundabout on Deptford Church Street and has pollution levels well above the EU limit.

This triangle of land will be right next to the Phase One building site and only 20 metres from a new construction site on the other side of the road at No.1 Creekside.

- **Pollution**

Recent air pollution figures show that the wildlife garden makes a very positive difference to people’s health and well-being – as the air pollution figures have shown Nitrogen Dioxide readings up to 62 micrograms per cubic metre on the Birds Nest roundabout (on the edge of the site) and only 30 in the centre of the Garden. In addition, the Goldsmith’s Citizen Sense project has conducted particulate testing in Deptford and their results (to be published in November 2017) indicate that the Garden is a key factor in reducing particulates in this particular area.

- **Funding and continued use of the garden**

The Garden has always been accessible to the public for a plethora of activities as stated above. There was an understanding when the Old Tidemill School moved to Deptford Lounge that the garden would continue to be their garden – as they have no green space provision at their new school site.

The community in collaboration with Assembly SE8 achieved £90,000 of public funding for Old Tidemill Wildlife Garden. This money came from:

People’s Millions (£43k); Arts Council England (£15k); Ground Work (£10k); Awards for All (£9.1k); London Play (£5k); NHS Choose Health (£5k); Deptford Challenge Trust (£4.3k); Capital Clean Up (£2k); & v Inspired (£0.5k).

In August 2017, the Mayor’s GLA Greener City Fund cited the Garden as a case study for Children at Play.

In the past this garden has also received money from GLA Pocket Park funding.

All of the Lewisham Ward Councillors have signed up to support the GLA’s desire to help make London a National Park City – and this garden is one of the key green spaces in Deptford of which forms a part of London’s National Park.

- **Asset of Community Value**

As well as providing alternative plans for consideration to the Council, **DNA** also **put in an application to make the Garden an Asset of Community Value** in order to purchase it and run projects such as a Forest School in June 2016.

The Council agreed that the Garden had a high social and community value but claimed it did not have a future, because *“the site was allocated for development”*.

- **Lewisham's Open Space**

Currently there is a **deficiency of 63.45 hectares of open space** across Lewisham boroughs. Deptford is the only area in borough which will have doubled in population by 2020 (in little over 2 years!). Deptford is a key regeneration area and there are currently another 6000 homes being built. Some of these include Sun Wharf, Kent Wharf and most recently No1 Creekside within 400m of the Garden.

The Applicant has implied (see 7.20 on page 89 of the Committee papers) that the current garden is **private open space** when in reality, it is **public green space**. Like any public space it requires some capacity to manage, and is run entirely by volunteers. In the past year this has been without any funding as a result of the pending planning application.

They have made it look like an overall increase in public open space when this is not the case.

All of the proposed green areas on the site, bar the one public through route from Reginald Road to Frankham Street, (which is nothing more than a "glorified path"), are to be private gated spaces. The proposal results in a loss of 2,400sqm of wildlife garden and half of another garden space which sits in front of Reginald House!

This is totally against obligations under the Open Space Policy where Developers **need to provide additional open space** on new developments and not reduce it!

- **Demolition of existing social homes at 2-30A Reginald Road**

There are actually no genuine reasons for knocking down Reginald House. It's structurally sound, it has had a new roof, new wiring and new boilers within the last 4 years. The Council have deliberately left Reginald House out of the Decent Homes schedule of works, whilst two blocks in Giffin Street which come within the same regeneration plans have been given new windows, and doors and the Crossfield Estate new kitchens and bathrooms.

The three leaseholders are unanimous that they do not wish to move - and why would they when they currently own 100% of their homes?

All but one of the 13 social tenants do not want to move.

The Applicant stated that they had fully consulted with the tenants and leaseholders but that the tenants had refused to engage. This is simply not the case. They also insisted that they had recently sent out a letter to the residents explaining the offer more fully and that they had knocked on the doors of the residents to speak with them about their housing needs.

However, the residents have not had any direct communication with the housing officer, and neither have they had any response to the letter they sent in August 2016 requesting answers to their questions relating to why the Council is seeking to demolish their homes.

All the residents complain that whilst they continue to pay service charges related to their **maisonettes** maintenance repairs to their individual properties and the upkeep to the building's exterior detail (e.g. railings, guttering, fascias etc) *are not being carried out*.

Furthermore, only 6 more flats will be created on the footprint of 2-30A Reginald Road.

- **Misleading financial information**

The Financial information given by the Council/Applicant is misleading, and full of errors.

i) The amount of social housing obtained with the GLA grant is insufficient and **well below your guidelines for 50-60%** social housing obtained from council owned land.

The figures have been artificially inflated to make it look close to your target – claiming 47% when the reality is 42% which breaks down as follows: 30% real social rented housing, + 12% shared ownership (74 social rented homes (61 net) out of a total of 209).

ii) The Viability Assessment attempts to show that there is no money left for the Applicant to contribute towards affordable housing, by seriously underestimating the GDV. Figures are based on 2015 new home sales in the area. In reality the developer can expect some serious profits from new home sales, perhaps as much as £100m more, that will be far in excess of the 20% (and 6% on affordable home builds) guaranteed profit already built into the figures (see Appendix 1).

iii) The land is being sold *at a quarter* of its real value. The people of Lewisham not getting value for money on their public assets.

LBL are offering the land to Family Mosaic for £13.5m, which is £4.34m per acre (Tidemill is 3.11 acres).

However, Family Mosaic paid £15.5m for Sun Wharf, it is only 0.70 acres, less than a quarter of the size of Tidemill. That is £21.4m per acre.

They plan to build 280 homes at Sun Wharf (a waterside site) extremely densely, only a proportion of which have a riverside view. This is only 25% more units than at Tidemill. With more space on the Tidemill site, the homes built there will be far more desirable. The transport links are closer which will likely make the homes worth far more.

But the Council are using a different model, as advised by consultants Urban Delivery, the same company who advise Southwark – which has resulted in almost zero affordable homes in their new developments.

- **Misleading direction**

The Chair of the Committee allowed the Applicant to mislead Committee members by not challenging the Applicant's statement regarding the contractual arrangements of this proposal, tied as it is to another redevelopment at Amersham Vale. They stated that building at Amersham Vale was on hold and awaiting a decision on the Tidemill site and that the fate of Amersham Vale was dependent on the Committee passing the Tidemill Planning Application. It was implied that if they didn't pass it they were jeopardising the

building of social housing on the Amersham Vale site. This was reinforced by the Head of Planning.

The Amersham Vale development was granted approval as a separate entity and should have had no bearing on the Tidemill development being considered by the strategic planning committee. The Amersham Vale development has had the ground cleared and is ready for work to commence. It could have been well on its way during the past 12 months. As a separate site it does not benefit from an economy of scale that would render it a hostage to the Tidemill development being approved, before building can commence on that site.

However the case in point is that this should not have been brought up by the Applicant, and to any official bystander of the proceedings this could be viewed as **prejudicial**. Now that it has been brought up perhaps it should also be reconsidered with respect to the level of social and affordable housing within it, in light of the additional GLA funding that has been received.

Also the Head of Planning and the Applicant implied that the new GLA grant funding would be in jeopardy if the application was not passed. We believe this to be untrue.

We have just discovered the Annual Accounts 2017 of Family Mosaic (now part of Peabody Estates for the benefit of GLA grant aid for this development) which were prepared in March this year (<http://www.familymosaic.co.uk/our-performance/>). It confidently states that the Frankham Street development had been approved even then.

In summary

We therefore urge you to call in this application, in order to examine the evidence for yourself. You will find that this scheme is not only contrary to the interests of the community, but also is fatally flawed, and contravenes so many London and Local Plan policies that it should not be allowed go ahead in its present form.

We look forward to hearing from you,

Yours sincerely,

Andrea Carey Fuller & Andrea Hughes

Deptford Neighbourhood Action (DNA)

Supported by Cllr Brenda Dacres

www.deptfordaction.org.uk

On behalf of in collaboration with community groups including Crossfields TRA, Reginald House Residents, & Friends of Old Tidemill Garden.