

From: Ray Hall [mailto:johnraymondhall@hotmail.co.uk]
Sent: 17 April 2012 14:57
To: planning policy
Subject: Lewisham Town Centre: draft AAP consultation

For the attention of Brian Regan
Planning Policy Manager
Resources & Regeneration Directorate
Lewisham Borough Council
17.04.12

Dear Brian Regan

Concerning:

- 1. Lewisham Town Centre Area Action Plan Development Plan Document**
- 2. Lewisham Site Allocations Development Plan Document**
- 3. Community Infrastructure Levy - Preliminary Draft Charging Schedule**

Thank you for your letter of March 9th, 2012, and for inviting comments on the Area Action Plan for Lewisham Town Centre as well as the other two documents as above.

I have lived and worked in the town centre for almost 37 years and there has never been a time so exciting as now.

Although the term needs to be more fully defined, my own view is that our town centre gaining 'metropolitan' status is able to be within reach. As you will see, I believe a 'well done to all concerned' is fully justified for getting this far.

I have set out below my thoughts and responses, as well as my suggested variations, to the draft AAP Development Plan Document.

As a backcloth

Quite a few years ago I helped organize an 'Our Town Centre' dialogue which brought together representatives of the public, private and voluntary sectors of our community. In those days that sharing of thoughts was relatively new. Today it is well established as the best way to bring out the best in an area as complex and as pivotal as Lewisham Town Centre.

It was clear then that the private sector had a key partnership role to play. This related not only to investment, but also to the promotion and management of Lewisham Town Centre.

I have written on a number of occasions to congratulate all involved in enabling the Barratts's Renaissance scheme that is now rising high in Loampit Vale. Not only is the residential component of enormous significance, but so is the provision for small businesses as well as what will be an exemplary Glass Mill Leisure Centre. As someone now in his 60's, I am looking forward to enjoying a swim there.

Lewisham Town Centre is doing well at present. Alongside Barratts, we have one of our country's

most enlightened and substantial developers as the owner of the Lewisham Shopping Mall: Land Securities. Add the commitment of a residential specialist of renown and strong capability in the form of the joint venture between Taylor Wimpey and MUSE ... and our town centre has potentially one of the most capable multi-sector development teams ever assembled.

The voluntary sector is also strong in Lewisham, as exemplified by the Quaggy Waterways Action Group, which has done so much to enable appreciation and the opening up of our rivers: the confluence of which being the very reason for the existence of our town centre.

Well done all

I thought it would be helpful to respond, therefore, to your kind request for comments on the draft AAP first with a word of encouragement.

The public, private and voluntary sectors are beginning to work together in a perhaps unprecedented way. Each sector needs the other and together we can all succeed. As a result, Lewisham Town Centre is definitely emerging as a brilliant place to live, work and enjoy being alive. There is still a way yet to go, but success is within reach.

Well done to all concerned.

Having been party to the earlier consultation process that led to the adoption of the Lewisham 2000 strategy for the town centre, I have a lot of appreciation for the significant public sector investment that went into that proposal.

My main observations on the draft AAP are, therefore, twofold:

- . To offer a thank you for what has been achieved in the past, as well as:
- . To offer an encouragement to go much, much further than its guidelines seem to imply.

A release

We are succeeding. To actually succeed, however, my view is that there needs to be 'a release':

- . A release of imagination that is pent up within the private sector;
- . A release of even more professional facilitation through the skills of the public sector; and
- . A release of genuine social integration that can only come through the involvement of the voluntary sector.

At present the thinking embodied in the draft AAP is far too constraining. With the release I am suggesting across all sectors, our town centre can truly 'take off' and the transformation we all so desire can be achieved.

The reference has to be that of the draft AAP: namely Lewisham Town Centre gaining metropolitan status. By that must mean, not just a quantum of retail and residential space, but the quality of being a destination on the national and even global stage: in essence a place where people want to travel to and enjoy.

Lewisham Town Centre is not at present such a destination. It has the potential, however, to become that.

I have to be open with you - because that is what genuine consultation is all about - but my view is that the present draft AAP will not enable that potential to be realized: far more is needed.

Declaration of interests

I now have to declare certain interests:

. I have worked as an architect, urban planner and development facilitator in and around Lewisham Town Centre for decades. I know it very well from a social, retail and development perspective: perhaps as much as anyone outside of the Council's own offices.

. I have worked with the market traders and know the issues they face. I have had meetings with the management team of the Mall as well as its owners going back to the more constrained days when Slough Estates were owners.

. I came to know many of the businesses well when I was founding chair of the Lewisham Chamber of Commerce.

. My home is just outside the town centre area and I own a piece of land as an investment within the AAP area as well.

. All of these interests demonstrate that I have a deep commitment to the town centre that is both social and commercial. Indeed, as the son of corner shopkeepers who built a sense of community through their work place, my view is that the social and the commercial are totally mutually intertwined. Get one wrong and the other fails.

. It is in that context that I have shaped initial proposals for a hotel on a site behind Lewis Grove at its junction with Lee High Road. I am confident that proposal will help transform the viability of the retail and restaurant offer in that location. I have had a preliminary conversation with Senior Planning Officer Emma Talbot about it.

. I have also followed through the implications of my observations on the whole town centre area into specific ways forward for consideration, the principles of which have been commercially tested. I have outlined several of them below.

Specifics

Let me now focus onto those specifics as advice for any revised content of the draft AAP.

. Firstly on an important matter of detail: I welcome the notion that the south east frontage onto the junction of Lewis Grove and Lee High Road is of townscape value. I think that is very perceptive and even masterly.

. The condition of that frontage is, however, a reflection of the low value of the ownerships, which in turn reflect the inadequate format and condition of the buildings behind. My view is that it would not be wise to place constraints on the owners by causing the buildings themselves to have to be retained. The elevations enhanced yes, but not the actual buildings. The reference needs to be an economic driver that facilitates new investment and townscape enhancement. As has been clear in the past, change for good will not happen without that.

. Also when emphasizing the benefits of the elevations there, could I suggest that the importance of opening up the River Quaggy so that its can be enjoyed is very important too. They need not be contradictory criteria.

. Unlike those in the northern section, the buildings in the central and southern part of the triangle formed by Lewisham High Street, Lewis Grove and Lee High Road are of poor quality and are of low commercial value. This could change.

. For that to happen, a bigger picture is needed to release value that could then enable their enhancement. My purpose now is not to set out fully how, but to say that there are a small number of commercial 'chess moves' needed to enable that to happen.

. The same principle applies to a development solution to the area to the immediate north of the southern roundabout: an area that comprises a number of uses and interests from the retail Mall to the commercial and other components external to it.

. The H Plan is part of the draft AAP, which removes infrastructure that was part of the Lewisham 2000 strategy. May I now share a strong reason for concern:

. I find it difficult to accept that the public sector investment in such very recent infrastructure cannot be harnessed for the benefit of all participants in the town centre as we go forward. It is an issue of good stewardship - and probably also imagination.

. That observation is also in the context of the assumption that the private sector would have to further fund the infrastructure variations embodied in the H plan. Those changes are in good part below ground. In my view those variations are unnecessary. They are also substantial and up front in order to shape a development site: the inevitable loser is the timing and quality of the end result.

. That observation in turn is in the context of what I would expect are the aspirations of Land Securities as the owners of the Mall.

. My expectation is that those aspirations could include the establishment of a major retailer as an addition to the Mall up to the northern roundabout - and serviced by existing infrastructure above the Mall. As I see it, it would be logical if that retailer was Sainsbury's.

. If achieved that would enable the transfer of the existing smaller Sainsbury's from its present location at the centre of the mall. The space released could then become a series of smaller units that could also open onto the Molesworth Street.

. That commercial 'chess move' could then release further space that could enable a second prime retailer to emerge at the southern end of the Mall with access both from and to the High Street and from and to Molesworth Street. A greatly enlarged Primark would make sense.

. Such a reconfiguration could also be part of the transformation of the southern end of the Mall onto the southern roundabout.

. My expectation is that Taylor Wimpey/MUSE would welcome the opportunity to position its residential scheme above the new Sainsbury's and hence above the Mall itself. My calculations indicate that there is volume to do that.

. When achieved, the viability and desirability of both the Mall and its residential component would rise significantly. That could then enable the prospect of community and associated leisure provision of substance to rise as well.

. The employment implications for especially our young people are enormous. The outcome could be a 'win win' for all.

. All of the above could be achieved without substantial new infrastructure and hence by working with the public sector investment already made. Private sector funds can, therefore, be fully used to ensure a high quality end result above ground.

. This would especially apply to the public realm where an imaginative solution to the conflict between pedestrians and vehicle is key. I am confident such a solution is within relatively easy reach.

. The beneficiaries would be all concerned and especially the broader community.

An aspirational approach

. The biggest weakness of the town centre is its visual and pedestrian insularity from the south, the west and the north. The format outlined above would address that fundamentally and very positively.

. The impression generated when coming out of the main Lewisham transport node and looking toward the Mall is probably the worst of any metropolitan centre in our capital. My view is that the private sector can transform that impression literally in a matter of months - and well within the 2026 goal for the achievement of metropolitan status as set out in the draft AAP.

. That cannot now be achieved by the public sector with its own funds. My suggestion is that the private sector players key to that area - led jointly by Land Securities and Taylor Wimpey/MUSE - be released and be allowed to define how that final transformation can be achieved.

. It is in their commercial interest and all of our social and environmental interests that they succeed.

. When released, Land Securities, Taylor Wimpey and MUSE I am certain have the imagination and the resource to deliver that success.

. To facilitate that success, the environmental criteria set set out in the draft AAP are very helpful: air cleansing and especially the real risk of flooding exacerbated by the dangers of climate change.

. As a detail, at planning committee the H Plan was recognised as having a detrimental effect on air quality. That negative outcome for residents and customers can, in my view, be avoided.

. A below ground car park and service area is necessary as part of the H Plan. The water table is high in that location, which is part of Flood Zone 3a. If flooding occurs on the scale possible, that basement could fill very quickly with dire consequences for any one trapped there. The effect on the viability and credibility of the town centre would be severe.

. This would require a lot of courage from its advocates, but this leads me to advise that the AAP should not have an 'H' master plan set within it.

. Instead it should have a series of clear aspirations: including ease of pedestrian connectivity between the Mall and the transport node, opening up of the confluence of the rivers Quaggy and

Ravensbourne, the shaping of new and enhanced green and blue public spaces as well as community and leisure provision.

. My advice is to then allow the imagination of the private sector - in conversation with the voluntary and the public sectors - to set out how it could deliver those aspirations in terms of design and content.

. From a public sector viewpoint, there may appear to be a risk. Knowing the lead players that would be involved - Land Securities, Taylor Wimpey and MUSE - I am very confident the Council and the broader community will not be disappointed.

A Wow! factor

. I mentioned at the beginning that metropolitian status is, I suspect, not just about a quantum of retail or even residential space.

. It is also about Lewisham Town Centre becoming a destination where people want to be: a place of national and even international renown.

. The thoughts that I have outlined here are geared to that end.

. There is, however, a very practical design feature that I have not and will not mention here.

. It is a design feature that is fully consistent with a distinctive that I see for Lewisham: that of a community that dwells amongst the hills and valleys of South East London with rivers that confluence in our Lewisham Town Centre.

. I would be pleased to explore what that feature could be with Land securities and Taylor Wimpey/MUSE as part of the exercise I am recommending. I am very confident that it could be easily funded from below ground infrastructure costs not spent.

. I am also confident that, when delivered, it would bring about the release of a 'brush away the cobwebs of the past' '**wow!** factor: a wow! factor that I believe is key to the promotion and positioning of 'our town centre' firmly onto the world stage.

. The beneficial implications for the whole of our community - and especially our young people - are enormous.

Management

. Finally, when as founding chair of the Lewisham Chamber of Commerce, colleagues recognized how important a commercially capable and socially sensitive town centre manager was to the success of 'our town centre'. Thanks to Lewisham Council's support, there have been some very good town centre managers.

. Due to funding restraints, I am told that such a post is not now possible.

. My view is that that post not only needs to return but that it has to do so on a greatly enhanced basis: with promotions, street cleaning, security and events management being part of its function.

. My suggestion is that that possibility be also added to the criteria for an aspiration based re-draft of

the AAP: a redraft that could be tabled to Land Securities and Taylor Wimpey/MUSE for their response.

. Their response could then be part of a further consultation/involvement process that could lead to perhaps the most exciting and truly fulfilling public, private and voluntary sector delivery partnership yet seen anywhere in the UK.

. My expectation is the the suggested way forward that could then emerge would lead to a solutions to the triangle I mentioned as well as enhancement of the market area.

In conclusion

I trust these responses are helpful. I also trust that they will be considered carefully.

Similarly I trust that it will be evident that there is a lot more behind the thoughts outlined. I would be pleased to discuss them further with you.

I have had a number of conversations over the years with many people, but it is important that you are aware that none of the organizations mentioned above have been party to this submission.

A copy has, however, been sent to Land Securities, Taylor Wimpey/MUSE, Barratts and the Quaggy Waterways Action Group as their names have been mentioned.

Thank you again for so much that has been achieved to date. So much more is now possible with imagination, good stewardship of funds - and if we all work in a mutually supportive way together.

I trust this is helpful to that end.

Appreciations as always

Ray

Ray Hall

AA Dipl (Arch & Planning), Architect RIBA,
Elected FCSD, and
Elected Fellow of the Insititute of Directors.

16 Belmont Hill, London SE13 5BD: 0208 318 7171

17.04.2012

Dear Ray, thank you for your additional comments which have been received and are now acknowledged. They will be put together with your earlier comments and all considered together, kind regards Brian

From: Ray Hall [mailto:johnraymondhall@hotmail.co.uk]
Sent: 23 April 2012 14:42
To: Regan, Brian
Subject: Lewisham Town Centre: draft AAP consultation

For the attention of Brian Regan
Planning Policy Manager
Resources & Regeneration Directorate
Lewisham Borough Council

23.04.12

Dear Brian

Consultation on draft AAP: Lewisham Town Centre

Thank you for confirming on the telephone on Friday last that you are in receipt of my observations on the draft AAP etc below.

A lot of work went into that document as I know you realize. It is reassuring that it will not get lost.

A few other points, if I may, before the deadline for consultation input arrives at 5.00pm today: each of which is geared to helping Lewisham Council succeed:

Rennel Street

. The big roundabout is often criticized. I actually think of itself it is very successful as a design as it does a number of functions in one solution, which is a credit to the many people involved.

. A problem, however, is that vehicles can stack back into it from Lewisham High Street and cause congestion on the roundabout itself. A frequent reason for stack back is cars that are stationary waiting to turn right into Rennel Street whilst there is traffic moving toward the roundabout from the north in Lewisham High Street.

. For your interest, years ago I advised against Rennel Street being accessed from Lewisham High Street. It should have been accessed from Molesworth Street from the south bound carriageway, with egress as a left turn back into Lewisham High Street and hence back to the big roundabout.

. If that had happened the problem of stack back as mentioned above would not have occurred as a form of short one way system would have applied with no cross traffic.

. When the present arrangement was designed, the notion was a pedestrian place outside of Lewisham House. It was never needed. The one way system could also have meant that a drop off and pick up place would have been possible in Rennel Street serving the retail - and in particular the

Mall.

. This format would be simple to adopt whilst we await any final and bigger scheme. The difference in efficient flow of traffic would be marked.

EU Health and Safety Law

. My own background is that of an architect. Under EU health and safety regulations, my understanding is that, if a client requires a building design that leads to an accident, that client can be liable for having caused the risk and even the death of the person or persons involved.

. If an architect in turn designs a building that has an inherent health and safety risk that leads to hurt, damage and even death, that architect can be seen to be liable.

. In the context of the draft AAP, Lewisham Council as the client and its planning department as the designer of the H Plan master plan could find themselves liable for any accident having advocated and designed an exposed service basement in an area of severe flood risk: a risk clearly stated in its own draft AAP.

. My understanding is that the designer can also personally be liable. That could mean individual Councillors, the Executive Mayor as well as the relevant planning officers. Again as I understand it, even you as Brian Regan could be personally liable as part of a chain of responsibility if this email is not properly considered at the right level.

. Another arena of serious concern evident through the professional press, is that it is clear that insurers are increasingly not accepting risks that were fully foreseeable and could have been avoided. It is possible that the open basement in the H plan master plan by being known to be in an area of severe flood risk may not be insurable.

. Climate change is causing the flood risk issue to become more serious. A possibility of an insurance refusal now is very likely to move towards a certainty in the relatively near future, causing any notion of a commercial and residential scheme of the master plan type proposed by Lewisham Council in that location to be non-viable in operation - with significant negative implications for all involved.

. The only possible remedy is either abandonment of a development in an area of recognized severe flood risk or allowing a very different design approach that fully addresses the considerations I have outlined here.

Could I suggest that the Council takes very clear, considered and long term legal and insurance advice on these two issues.

Part of that suggestion is to follow my proposal in the consultation response and urgently change the draft AAP to being one of aspirations and not a design master plan requirement as embodied in the Council's own H master plan.

Mature trees

. My last observation is again one that I have made before:

. Trees take years to mature and are very sophisticated cleansing organisms: the ones in Quaggy

Gardens, in the middle of the big roundabout and the central reservations and edges of that roundabout have taken some 14 years to mature.

. Their planting and maintenance is a credit to all concerned.

. Each is an asset to the town centre and each does a great job aesthetically and environmentally.

. To be consistent with its own policies as set out in the draft AAP, could I suggest that it is best not remove them but work with them.

Conclusions

I trust these further thoughts are helpful.

All relate, as with my main response below, to very serious issues. Each is, therefore, shared with the goal of enabling a far better outcome than that currently embodied in aspects of the documents consulted upon.

As previously, I have copied this email to Taylor Wimpey/MUSE, Land Securities and Barratts as well as South London Business that has taken a real interest in the thoughts I have shared, as have GLA members Len Duvall and James Cleverly.

Due to their seriousness, I would appreciate it if you could kindly, please, confirm receipt of this email and that its contents have been read and are understood.

Appreciations as always

Ray

Ray Hall: 16 Belmont Hill, London SE13 5BD: 0208 318 7171

From: Ray Hall [mailto:johnraymondhall@hotmail.co.uk]
Sent: 23 April 2012 15:44
To: Regan, Brian
Subject: Lewisham Town Centre: draft AAP consultation: further concern

Attn Brian Regan
Lewisham Borough Council

23.04.2012

Dear Brian

Lewisham Town centre: draft AAP consultation

I am sorry to have to add a further concern before today's deadline.

I am as you may know an architect who has worked on a large number of projects, especially in complex urban areas.

An early one was a large church building in Brixton called St Matthew's. Below ground adjacent to it is the River Effra which descends from Crystal Palace. The land on which it sits has a very high water table.

The conditions are similar to those where Lewisham Council has proposed the H Plan, although I would expect the situation there to be much more serious due to the recognized severe dangers of flooding.

A precedent in Brixton

When we tanked the crypt of St Matthew's, a volume of moving water below ground was displaced, the water table rose all around the building significantly flooding the crypt and generating what was effectively a lake. By being on the side of a hill, that lake subsided and we were able to empty the crypt.

We then had to redesign its layout to allow for the danger of future similar situations. Thankfully we succeeded.

My expectation is that the confluence of two rivers in an urban flood plain may not be as easy.

The night mare scenario is not only the one I have outlined below, but also its effect on the new Glass Mill leisure centre that could cause it to be a serious health risk, with all that that could imply. As you know, I want that excellent provision to be a huge success

A radical rethink is needed

The Council and its advisers may have answers to all of my concerns. If so I would suggest that some form of public statement is needed. I have found some of these concerns have been ignored at times when raised in the past.

The more I think through the Council's proposals, the more I am certain that a radical rethink is needed ... and urgently.

On this occasion I have not copied this email to anyone else outside my own team, but may do so shortly. As previously, could you please acknowledge receipt and understanding of its contents.

I trust all of this is helpful.

Appreciations again.

Ray

Ray Hall

Raymond Hall Ltd: part of People and Places International: London, Belfast and Pune, India
16 Belmont Hill, London SE13 5BD: 0208 318 7171: 23.04.2012