

The Tenants Action Group



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Your Ref :
LDF – Core Strategy Development plan document proposed submission version – February 2010

Dear sir,

This letter should be taken together with our earlier submissions on the Local Development Framework.

This letter looks at the whole submission, yet has a focus on the impact on the north of Lewisham – Deptford / New Cross.

We disagree with your Core Strategy proposals, because at present they are taking away all of the strategic employment areas – by making them into what are now termed Mixed Use Employment Locations (MELs) - and not offering any genuine replacement of real jobs and work for local people from the present, and into the long term future.

It is justified ? Is it deliverable ? We think not.

Quote from Report : “The emphasis of national planning policy is on the regeneration of Britain’s towns, cities and regions.”

Yet this Policy relies on someone else doing things in Lewisham – principally for their own financial benefit as developers and the private sector, and bringing with them a new population who will probably over time serve to only to displace the existing “diverse” population. Rather than anything that can be considered as innovative from Lewisham itself to serve the people that it has now.

There is clearly a “North <> South” divide in this Policy for Lewisham.

Quote from Report : “The borough is primarily residential in nature, ranging from a suburban character in the south to higher density neighbourhoods in the north ...”

The north of the borough is repeatedly recognised as being densely populated with mainly flatted properties, and is clearly designated as deprived; and then is clearly designated as being the place for the most physical regeneration – doubling the population yet again (with a new, and more affluent population).

Quote from Report : “The Index of Multiple Deprivation (IMD 2007) saw Lewisham ranked as the 39th most deprived local authority in England, with a number of areas ranked in the 20% most deprived in England ...”

This concentration is not sustainable within existing resources, and new resources would require substantial new facilities – much more than is indicated in the Report - such as new primary and secondary Schools, new medical health Centres, etc; as well as overloading the present road structure with more traffic.

This new concentration of the Five strategic sites that have been identified as :

Convoys Wharf
Surrey Canal Triangle
Oxestalls Road
Plough Way
Lewisham Gateway

Will be, if taken to fruition, like a “new town” being built, in North Deptford.

The Council should show a much wider view by looking into the ability to meet the requirements for new housing across the whole of the Borough – both north and south, in more equal measure. There are several identifiable sites, in the south of the borough, that can be used for the purpose of new housing. Or is it that new housing in the south of the borough will raise more opposition ?

Quote from Report : “A dramatic change has taken place in the tenure of property in the borough in the past few years. This provides a roughly equal tenure split between private rent, social rent and private ownership. It is considered that the increase in private rented sector is a result of the buy-to-let market in recent years”.

This is shockingly disingenuous – were not the Council in charge of the planning policy that allowed (and indeed encouraged) the sale of Council owned land to Housing Associations and to the private sector ? Together with clear policy for “Stock Transfers”.

Quote from Report : “The amount of private rented properties has increased from 14.3% in 2001 to 29.8% in 2007. Conversely social rented properties have fallen from 35.6% in 2001 to 30.2% in 2007, while properties owned outright or with a mortgage have decreased from 50% in 2001 to 40% in 2007”.

Quote from Report : “Close to 34,000 households were assessed as living in unsuitable housing due to one or more factors. The largest reason was overcrowding (11,482 households), and major disrepair or unfitness (10,641), followed by support needs, accommodation too expensive and sharing facilities (6,151, 5,263 and 4,487 respectively)”

Quote from Report : “Affordability of a home remains an issue throughout the borough. Based on the GLA Housing Price 2008 data, the housing price in Lewisham has increased steadily over the last five years. However, it is still lower than the London average prices (£249,789 compared with £297,785). This is particularly relevant given that the Lewisham Household survey for the SHMA asked a question about household income. This included gross household income from all sources such as earnings, pensions, interest on savings, rent from property and state benefits. While just under a fifth of households have an income of over £40,000, nearly half of all households have an income of less than £15,000”.

The Council have clearly demonstrated that their stewardship has been to not adequately maintain their properties, over many, many years; and not to enforce the building of sufficient new social rented properties.

The Report seems what to have things both ways – to now build a great deal of new “dwellings”, and yet to develop a more successful economy in the borough.

Whereas, the two following quotes from the Report show that Lewisham's economy is, in fact, very small and fragile – and yet the Council is proposing to “take over” much more of the currently designated employment land for housing use.

“Despite being the third most populous inner London borough, Lewisham's underlying economy is one of the smallest in London, ranking 30th out of 33. The borough workforce numbered around 66,000 in 2006, a rise of 8% since 1998. This is in line with regional and national averages, but below the sub-regional average. Only 31% of the borough workforce are employed in the borough, with the majority travelling outside the borough to work”.

“The borough lost nearly a third of its already fragile industrial base between 2000 and 2004, and the stock of commercial property has decreased in recent times. Commercial and industrial stock shrunk by 8.7% between 1985 and 2003”.

It then gets worse still :

Quote from Report : “Lewisham's economy, by London terms, has a relatively small proportion of knowledge based jobs in the borough, which has continued to decline when compared with London as a whole. Generally there is a greater reliance on employment in the public sector, education and retail. Many of the local jobs can be considered relatively low value in output, which reflects the relatively low wage levels. The over-reliance on the public sector accounting for one-third of local jobs may also limit opportunities for enterprise driven by the private sector”.

Even if the future forecast is better, for jobs and work – is the work of any real long term sustainable value ? Is there any manufacturing output ? Is there any new high value knowledge base ? What can the young people of Lewisham aspire to, as locally based jobs ? Well it seems it will be office or retail employment.

Quote from Report : “Between 2006 and 2026, Lewisham's total employment numbers is forecast to grow by 16,950 jobs or 847 jobs per year. This is a 21% increase over the plan period, which is in line with the London average of 20%. The bulk of this growth is accounted for in the business class sectors (e.g retail), which grow 465 jobs per year, closely followed by office employment, gaining approximately 400 jobs per year. Industrial and warehousing change is insignificant by comparison. Office jobs are forecast to grow by 52% compared to a regional average of 41%, while industrial jobs fall 5%, which is below the London average of 8%”.

The Council's answer seems to be along these lines :

Quote from Report : “The opportunity to provide new housing in a highly developed borough is limited, so reviewing opportunities to better use underused employment areas and town centres as housing locations is necessary. This can protect established residential neighbourhoods, particularly conservation areas. The need to provide sustainably designed new housing and ensure existing homes improve energy efficiency is crucial to address climate change issues and improve living conditions”.

Simply put, this is – more housing on employment land, and build more housing in town centres !

However, the Council really believes that –

Quote from Report : “Growing the relatively small borough economy is a priority of the Council and is essential to the creation of a sustainable community. A key priority is the need to provide and strengthen local employment opportunities and enhance employment prospects by improving local training opportunities, and accessibility to jobs within and beyond the sub-region”.

How these “two opposites” are somehow meant to reconcile is left to a “trust” in the Council to get it right – yet there is no sensible and sound evidence for it.

Does any of the following actually make any sense ?

Quote from Report : “The benefits of new development need to be maximised for all in the community and will be central to addressing and reducing issues related to deprivation in order to improve education, employment and training opportunities, and reduce health inequalities. New development can contribute to both the provision and enhancement of existing services and facilities, where demand for them arises from new populations. There is also a role to play in creating a sense of place and community through the high quality design of buildings and spaces that are safe and contribute to a healthy environment”.

To conclude this part, the Council has the following vision for the borough : “Together we will make Lewisham the best place to live, work and learn”.

An aspiration, perhaps, but not evidenced in any way except by inherent contradictions in the policies together with an over reliance on developers and the private sector to then deliver it.

In all of this series of contradictions and ill-thought out policies we are not going to get any new open and green spaces of any significance.

Quote from Report : “As the most densely populated part of the borough and the main focus for further development (Deptford and New Cross), the provision and accessibility of open space, its management and protection of environmental assets within the Regeneration and Growth Areas plays a key part in the success of place making. The Council will focus efforts on improving the accessibility and quality of existing open spaces, while taking the opportunities to increase its quantity to address current deficiencies”

Whereas we are assured that what is “new” will be of a “high quality”. Yet how do we know what that will be when it is not referenced to any quantifiable standard ?

Quote from Report : “The strategy seeks to benefit local residents who suffer from some of the highest levels of socio-economic deprivation in the borough. New development will be high quality; it will need to address severance issues and improve connectivity to parks, shops, schools and local neighbourhoods. Upgrades to the overall environment will be in line with the design aims of the Core Strategy”.

In terms of housing provision, what can we expect from the Council ?

Quote from Report : “2 – The Council will seek the maximum provision of affordable housing with a strategic target for 50% affordable housing from all sources. This would equate to approximately 9,082 net new dwellings between 2010/11 and 2025/26

3 – Contributions to affordable housing will be sought on sites capable of providing 10 or more dwellings. The starting point for negotiations will be a contribution of 50% affordable housing on qualifying sites across the borough. This would be subject to a financial assessment.

4 – To ensure a mixed tenure and promote mixed and balanced communities, the affordable housing component is to be provided as 70% social rented and 30% intermediate housing”

Decoding all of that – we get something around, well perhaps, of 30% new social rented “dwellings”; leaving the bulk of the new housing as 70% private and intermediate.

The “decode” is > contribution of 50% affordable housing, then leaving the other 50% as private. From the 50% affordable, 70%, perhaps (?), for social rented, leaving the remainder intermediate.

Not easy to work out – is it ?

Why not just have a different – and a proper target – for 60% social housing, from all new housing in the borough; to address the waiting list in Lewisham of over 17,000 ?

Quote from Report : “The Deptford New Cross Masterplan examined the development potential of a number of sites in the north of the borough and looked at how development could improve the wider area and local neighbourhoods. The masterplan identified that the area was dominated by inward looking housing areas with a fragmented street network, made worse by a number of railway lines and viaducts, which reduced the ability to walk and cycle within the area. It found that links to local parks and the Thames were few and that the area suffered from a poor overall environmental quality. The policy seeks to remedy these faults to the benefit of local residents who also suffer from some of the highest levels of socio-economic deprivation in the borough, by ensuring that new development is high quality, addresses severance issues and improves connectivity, and upgrades the overall environment in line with the design aims of the Core Strategy”.

We wonder if local people will recognise any of this disparaging description of their local area(s) – “inward looking”, “fragmented”, “made worse by ...”and that the area suffered from ...”

Who, exactly is in charge, then, of the borough, if it is not Lewisham Council. Did they not author all of these things, themselves, described here in a negative way, over all of the past years ?

To conclude, the document is 190 pages of persuasive words – yet, when analysed, what does it all really mean ? Not much for local communities who will simply be swept aside by this Policy.

Yours sincerely

Malcolm Cadman, Secretary TAG

David Fleming, Treasurer TAG