

4 members of A Better Lee Green September 2015 Leegate Submission to Lewisham Council

More focussed council determination needs to be applied to Leegate's regeneration to ensure a swift development that resolves Leegate's current problems without creating new ones.

None of the information we requested in our April response has since been made public. We therefore reiterate our concerns listed in our April 2015 submission and particularly stress the following points:

Traffic:

The future predicted traffic figures in the application ignore significant predicted traffic from committed developments despite it being both common sense and accepted industry-wide that they should be included.

We are compelled to conclude that the applicant has omitted committed developments because they push traffic saturation to unacceptable levels at most sites, up to 162.7% saturation at the Tigers Head junction even after mitigating circumstances are taken into account which cannot be acceptable in anyone's view (see appendix for full details and calculations).

Correct future predicted traffic figures must:

- **Reinstate committed developments, both those St Modwen has listed in it's application and the ones it has omitted**
- **Not assume future decline in existing traffic on Lee High Road and Burnt Ash Road**
- **Not assume that because Lee Green is an established residential area committed developments will not generate new traffic**
- **Not double count the effects of improvements to the Tigers Head junction and cycle and pedestrian routes**
- **Not reduce the development's % new trips from what St Modwen calls it's 'robust' 70% figure**

It's essential that the correct future predicted traffic figures are agreed and it's made clear how the resultant queuing and saturation from those figures will be managed

Air Quality:

The applicant claims that air quality effects will be negligible based on modelling of receptors up to 50m high, where pollution has dissipated and above where vehicles emit and pedestrians are affected (see appendix for details)

A revised Figure 8.1 must be made public showing Air Quality figures at each monitoring location

- **Measured at around 2 metres high**
- **Not double counting the benefits of pedestrian and cycle routes**
- **Accounting for increased people exposed to pollution above legal limits on Burnt Ash Road**

Affordable Housing:

St Modwen justifies low levels of affordable housing with a confidential viability assessment. **We request that the viability study and Lewisham's consultants assessment of it be made available for public scrutiny** (see appendix for further details).

Use of out of date data:

The applicant's retail and traffic justifications rely selectively on Nathaniel Litchfield's Retail Capacity study yet the Retail Capacity study states itself out of date past 2014. **We request an updated retail report from Nathaniel Litchfield and ask that it's findings be provided for in the application.**

Public Space:

St Modwen incorrectly compare proposed and existing public space (see our April 2015 submission) and has previously been asked by planners for examples of where similar public space has been successful in other district centres. **We request that independently measured existing and proposed public space and relevant successful district centre public space details be made publicly available.**

Diversity:

After being challenged on diversity grounds, St Modwen increased the number of small retail units on the same sized piece of land. **We request details of the dimensions of the small retail units.**

Noise Pollution:

We request a noise pollution assessment for properties in and close to Leegate, not just those in the Leybridge Estate, further away, as was included in the initial application.

Without the information listed above the community are excluded from meaningfully participating in the consultation process and Lewisham planners surely cannot well advise the strategic committee.
We request the deadline for submissions be extended until the community have been given time to review the correct information.

Appendix

Traffic

Transport Assessment appendices pages 117-216 show detailed calculations of existing and future predicted saturation levels.

St Modwen's future proposed calculations (future existing traffic levels plus that generated by the development) already show traffic saturation going over maximum levels in several places (up to 110.3% at the Tiger's Head junction on page 186 Transport Assessment appendices). However, even this scenario is based on a future existing calculation (ie what future traffic flows would be without Leegate's development) that excludes committed developments.

St Modwen has calculated but chosen to ignore 'future existing figures' including committed developments presumably because committed developments push the saturation levels up hugely; even without their Leegate development, levels will be up to 155.8% saturation levels at the Tiger's Head junction (page 195 Transport Assessment appendices).

This figure of 155.8% would be even higher if St Modwen had included these developments very close to the Tigers Head junction from its list of committed developments:

- Osborne House on Osborne Terrace – 41 dwellings being built in long-term empty building and application for 4 more
- Greek Taverna on Lee Road – 7 dwellings being built
- Leybridge Estate – 9 dwellings being built
- Boone Street – 25 dwellings permission given 2015
- Peabody Estate – 17 dwellings application made - Millbank Way, Osberton Road, Cambridge Drive
- Vauxhall garage at Tiger's Head junction – empty when traffic survey done: huge site that will be developed so traffic estimate should be made

The applicant agrees that the inclusion of committed developments pushes the Tfl model over capacity at 9.3.5 of the traffic assessment. It then justifies exclusion of committed developments from it's calculations incorrectly:

- Transport Assessment 8.4.1 explains the omission of committed developments because 'Lee Green is an established residential area'. This makes no sense. In any case, Lewisham's work on retail catchment areas referenced in 7.2.4 shows high levels of residential car ownership. This same percentage must be applied to new dwellings given that new developments are being built with parking spaces.
- Transport Assessment 8.4.1 further justifies the exclusion of committed developments saying that levels of traffic in London have recently declined. However, table 8.5 shows that Lee High Road and Burnt Ash Road traffic have been stable since 2012, giving no evidence for the claim on those roads.

It is particularly contradictory to not include committed developments in traffic calculations when they have been included in air quality calculations (4.3 of the Air Quality Technical Appendix)

A calculation including both committed developments (St Modwen's and ours listed above) and St Modwen's redeveloped Leegate would see saturation levels around 162.7%:

Future existing saturation including committed developments (pg 195 Traffic and Transport appendices)	155.8%
Effects of committed developments not counted by St Modwen (estimate)	1.0%
Traffic from Leegate development (8.1: Air Quality Technical Appendix page 23 – difference in traffic with/without development)	<u>5.9%</u>
Total	162.7%

The applicant is aware of the traffic implications of it's application and attempts to diminish them by double counting the benefits of improvements at the Tigers Head junction and cycle and pedestrian routes. For example, table 8.5 shows local trunk, Burnt Ash Road, already has more traffic on it than red route A20. Traffic on it is expected to increase by 5.2-34.6% (Chapter 7 Traffic and Transport tables 7.3-7.5) with 6,115 new vehicles turning in and out of Leegate from Burnt Ash road alone per day (Air Quality Technical Appendix Table 21) and yet the applicant claims that driver delay 'will not significantly change' (Chapter 7 Traffic and Transport 7.6.3) because of improvements at the Tigers Head junction (at Chapter 7: Traffic and Transport table 7.9) and inclusion of pedestrian and cycle improvements: The small improvements at the Tigers Head junction and pedestrian and cycle routes are already included in the calculations of traffic increases of 5.2-34.6% and this claim double counts their benefits.

The applicant says in Transport Assessment at 6.7.6 that '70% of all trips have been assumed to be new where this figure might be nearer 5-10%'. This would almost eliminate new traffic generated by the site and is simply not believable. Use of 5-10%

must be challenged since the report rightly called 70% 'robust'. The suggested 5-10 % figure also does not account for passer-by, diverted and transfer traffic mostly currently being on the A20 and not on Burnt Ash Road where it will be diverted.

Correct future predicted traffic figures must:

- Reinstate committed developments, both those St Modwen has listed in it's application and the ones it has omitted
- Not assume future decline in existing traffic on Lee High Road and Burnt Ash Road
- Not assume that Lee Green is an established residential area so committed developments will not generate new traffic
- Not double count the effects of improvements to the Tigers Head junction and cycle and pedestrian routes
- Not reduce the development's % new trips from what St Modwen calls it's 'robust' 70% figure

Air Quality

St Modwen's traffic and air quality calculations do not tally. For example, traffic on Burnt Ash Road is expected to increase by 5.2-34.6% (Chapter 7 Traffic and Transport tables 7.3-7.5) but air pollution will increase by only 1.2-2.3% (Chapter 8 Air Quality Table 8.13).

The discrepancy between the traffic increases and its impact on air quality may be explained by the fact that modelled off site receptors are often 5-20 metres high, one as high as 50 metres; much higher than emitting vehicles and exposed pedestrians on the ground (Table 9 of Air Quality Technical Appendix) and where pollutants have largely dispersed.

8.101 of Chapter 8: Air Quality sites new pedestrian and cycle routes as being mitigation measures against decreases in air quality. This is double counting since predicted air quality figures are calculated based on predicted vehicle visits to the site, already reduced by the expected numbers of pedestrians and cyclists visiting the site.

Chapter 8: Air Quality 8.86 states 'The development is not forecast to cause any additional exceedances of the AQO'. However, 8.60 of Chapter 8 says that where new exposure is being introduced into an area of poor air quality, the number of people exposed to levels above the objective or limit will be relevant. 8.109 suggests that as the width of public space is greater than the current pavement, exposure will be decreased. This is not logical since what is now a pavement, which people move through, will become a public space, for people to stay in for a period of time, so more people will be exposed for longer periods of time to levels of pollution above air quality limits.

A revised Figure 8.1 must be made public showing Air Quality figures at each monitoring location:

- Measured at around 2 metres high
- Not double counting the benefits of pedestrian and cycle routes
- Accounting for increased people exposed to pollution above legal limits on Burnt Ash Road

Affordable Housing

The applicant defends 15.7% affordable housing with a confidential viability report. This study should be made available for public scrutiny since the applicant previously claimed housing and rebuilding Leegate were not viable and then it was shown that their calculations were incorrect. For example, we want to see assumptions made about prices of apartments for sale, shared ownership and to rent at market and affordable rent and ground rent.

The applicant doesn't want this information released. However, recently in Greenwich a tribunal decided an un-redacted viability report being similarly used to justify a reduction in numbers of affordable housing must be released for public scrutiny. Greenwich have now agreed to make future viability studies public.

Out of Date Data

The applicant has selectively used information from Nathaniel Litchfield's out of date Retail Capacity Study extensively to justify retail need and traffic calculations. Planning officers agreed in September that an updated report has been commissioned and could be viewed by the public.

Noise Pollution

In the table of responses the applicant has said that double glazing will shelter homes facing Eltham and Burnt Ash roads from road traffic, but it has not made clear how homes overlooking the hole to the car park in the residents gardens will be sheltered or how the homes in Carston Close and across the road on Burnt Ash Road will be protected.