

## **Appendix C - Stakeholder Responses to the public consultation on Forest Hill Pools**

This Appendix includes the full written responses to the consultation from the Forest Hill Ward Councillors, the Forest Hill Society, and the Sydenham Society.

### **C.1 Forest Hill Ward councillors**

"As Forest Hill Councillors we're pleased to have been involved with the consultation and planning for Forest Hill Pools. We welcome the progress that is being made on this building – from being threatened with closure to the promise of new facilities – and the fact that the potential investment has gone up over time from under £4 million to nearly £10 million. We also welcome the fact that the Council has acted on the Council motion passed last year requiring officers to look at the site as a whole and not just at the old pool building in isolation from Louise House, the Library and the adjacent park. We are strongly of the opinion that it is only by looking at the site as a whole that the variety and quality of leisure facilities the residents want can be provided, together with the potential subsidy from housing, if necessary, to pay for them.

We also welcome the setting up of the stakeholder group and the efforts that the Council has made to consult with the local Community. Nevertheless, despite the time and efforts of officers, concerns remain about some aspects of the consultation and the way it has been handled.

#### **The options as presented**

In the context of the options presented in the current consultation, our preference is for an option that is between option two and option three, with a request that officers consider additional means of providing housing subsidy, either on this site or elsewhere, to make this a truly excellent long lasting public building that can meet the aspirations of local residents for facilities and design.

To address the options in more detail:

Option 1:

We see little merit in option one. It does not provide the two pools that we know local residents are very keen to have in place. The dry leisure facilities are very limited, with limited community space and public green space. We feel that when the cost of demolition is added and all the

design work is undertaken it would be a mistake not to add the housing to provide the community with the leisure facilities that they have been clear in telling us that they want.

Option 2:

We support this option as providing two pools, increased leisure facilities and increased community space. However we would like to add more to this option to make it a really great and long lasting community facility.

Option 3:

We support the increase in facilities that are available in this option and recognise that this requires additional housing to pay for this. However we do have serious concerns about the position of the intended housing and the height and prominence that it is given. For this reason we are not fully able to support this option as it is presented. We would like some more thought to be given to providing the housing element and how it will better fit with the surrounding areas.

### **Our preferred option**

Over the past few years, we have been privileged to listen to and speak with many members of the local community about the future of the Pools site. There was great dismay and fear when the building closed, but also optimism about the potential for better facilities on the site.

We feel that the balance of opinion of those we have spoken to would best be represented by having facilities as offered and arranged in option 3 but with a strong preference for the housing layout in option 2, and we support this hybrid option.

We would like to see the balance of any housing provision weighted toward the back of the site, and consider that the proposal for seven stories is too much for this site; the building line and height of Salcombe House would be a more appropriate guide.

The massing of the construction is described as a “gateway building”, but in our opinion there is a great danger that it would serve as an over prominent and divisive piece of architecture that would over dominate Dartmouth Road and would separate the pools from the Library.

Lastly, we must reiterate that the Pools building represents history as well as functionality, and that any development on the site must recognise this and maintain continuity with the past. We sadly note that the current building has not been properly maintained for many years, and as a

consequence it would be uneconomic to undertake a proper refurbishment or a redevelopment that would keep the current structure complete.

Therefore, we feel it is incumbent upon the council and its architects to give the people of Forest Hill a landmark building that reaches into the past as well as the future, and that is of sufficient merit to inherit the legacy of swimming at London's oldest baths.

### **Extending the options**

We would encourage officers to look slightly further a field to examine adjacent council owned sites that may help to provide the level of housing required. For example, some feasibility work should be conducted on a two phase project, with the Pools / Louise House site completed first and a phase two looking at providing additional housing by developing land in the Torcross Drive estate. There is a window of opportunity for this work to be done and the site safeguarded before the stock transfer for Torcross later this year.

While we are aware that this is a massive expansion in the present plans we feel that this option has many merits that should be carefully considered. It would be a shame if actions taken now rule out this possibility at a latter date.

### **Facilities**

Through various meetings with residents and officers, and through our participation in the stakeholder Group meetings, we have received and made various suggestions for the facilities to be included in the new pools. This an non-exhaustive summary:

- We want two pools. The first should be 25 metre and at least 6 lanes. We feel a secondary learner pool is essential for school swimming and allowing for multi activities to go on tighter.
- We would like to see the second (or even a third smaller) pool offering hydrotherapy. I understand that these facilities are very limited in Lewisham with residents having to travel out of borough for them. We would like to see this pool having a floor that can be raised and lowered and to have the required hoists and lifts to get people in and out.
- The community area should be open, secure and a comfortable public space that has activities going on so that residents feel safe and secure. One suggestion is for a 'bouldering wall' and perhaps an

outside climbing wall so that the sports activities are also on the outside and so that the space is occupied and used in a highly viable way. The street furniture needs to be of a high standard and consideration given to lighting and trees and public sculpture

- A café is a good idea and it would be good to have some exhibition space as well
- It would be good to have a room that could be used as a community meeting room, perhaps a room with movable partition walls so that it can be subdivided and opened up
- More thought needs to be given to how people will move around the outside of this building and inside it. There should be an entrance to be added on Dartmouth Road on the library side, and it's not clear if the connection with the Library has been fully thought out. The space outside the front of the library and how it will connect with this building needs careful consideration.
- As a general point this building still has some issues with the way that it sits with and interacts with the Library.
- We would like to see a community Nursery provided either on or off site to open at the same time as the pools that is of a comparable size to the old one.
- An option for gym facilities should include a steam room.
- The building should have a zero-carbon lifecycle and lifetime, and perhaps look to be a net generator of electricity – one idea that has been suggested is for fitness equipment to be linked up to generation facilities.
- There should be further consultations and imaginative ideas presented for any additional space to support the community which for example has the highest proportion of self employed people or could offer some alternative health provision or spa type facilities

### **A quality building**

We welcome the fact that this is not a PFI project and that the control of this building will be kept in house. We feel that this will result in a better building and one that local residents will have more opportunities to influence in terms of facilities provided and design. The danger is that if the building does not meet expectations then the blame will rest squarely with the council.

We are replacing two old historical buildings and serious consideration needs to be given to ensure that this is the right decision and that the new building is a worthy successor to them.

We welcome the commitment from officers to employ archaeological architects to look at the merits of the old buildings and what elements might be preserved and how they might be passed on adapted or used in the new building. However, there remain concerns and we would welcome:

- Further consultation on what elements are to be preserved or passed on and how this can best be done
- The new building should show some of the history of the buildings that precede it – for example, incorporating some of the architecture in the exteriors or presenting the machinery from the current building.
- The new building need to be built to last a long time with a zero carbon lifetime and thought given to maintenance costs.

### **Consultation**

While we recognise all that officers have done in terms of consulting with the public there are still some aspects that have caused concern.

- Many residents are unclear about what this consultation is about it is the layout/facilities or is it about design. This lack of clarity will affect the results
- This consultation clearly has some design elements and it is a shame that it is the same style of building that is presented in all 3 options
- The full consultation leaflet should have been delivered to all local households close to the pools at a minimum. The previous document was delivered fairly widely.
- It would have been good if councillors could have been consulted prior to the consultation going live so that we could give some impute into this
- We greatly appreciate the work officers have done to work with us to organise a public meeting as part of the consultation process. We are strongly of the mind that a public consultation is an essential part of the consultation so that the public feel they have been genuinely consulted.
- It would have been preferable if the consultation had not been during the school holidays

### **Going forward**

- We welcome officers commitment to the public meeting. I think that it is important that there is public discussion about the demolition of the old buildings even if this does not provide much in the way of positive suggestions

- Local residents do have a strong feel that they were not consulted on the option to demolish. It could be good to make public the plans of the Sydenham society for comparison.
- We welcome the commitment to bring the results of the consultation to the stakeholder group for discussion
- There should be further public consultation on the design elements of the building with some different design options presented to the public.
- There should be a public competition for the design of the building being run once this consultation has been finished. While HLM have done a good job it would be good to have another vision of this building at a minimum to ensure we are choosing the best option."

## **C.2 Forest Hill Society**

"The Forest Hill Society welcomes LBL's commitment to swimming in Forest Hill, and the promise of "no demolition without consultation". Whilst we welcome the three options presented as part of the consultation, we have some reservations about the options offered and consultation process so far.

### **Facilities**

As the Forest Hill Society we believe that an improved leisure facility on the site of the pools and Louise House is vital to the continued success of Forest Hill as a town centre. These facilities will attract people to the area and they will use other local facilities such as the shops and library at the same time.

We have collated feedback from local residents and have already passed on some of the best ideas to the council through the stakeholders' meetings.

### **The most important requirements are:**

1. The need for two pools – a main pool and a learner pool.
2. We think that a strong connection between the library and the leisure centre is really important and envisage an overlap of courses between the two buildings enhancing the offering from both.

### **Other considerations:**

3. The learner pool could have a moveable floor to make it suitable for children of different ages and for hydrotherapy. According to the architects present at the station display this would not add significantly to the overall cost of the project (the figure of £100,000 was quoted).

4. The community area should include a regular shaped space for use as a large meeting hall (for up to 150 people), but more often can be divided into 2 or 3 rooms which can be used for education or for sport or community groups.
5. Innovative sporting facilities would help make the facility popular and well used e.g. a climbing wall and possibly boulders for non-supervised climbing outside the leisure centre.
6. We think that a strong connection between the library and the leisure centre is really important and envisage an overlap of courses between the two buildings enhancing the offering from both.
7. More retail units are not required when there are already many unoccupied retail units in the centre of Forest Hill.
8. A cafe is a good idea and should overlook the pool, with easy access for parents to move between the cafe and the changing area to assist their children.
9. Parking needs careful consideration, especially if there is to be additional housing on the site. We would not want to see a CPZ imposed on Derby Hill, Thorpewood Avenue, and Derby Hill Crescent, but there would need to be controls over car use for any residents of the properties on the site. With recent developments in Forest Hill there does not seem to be a way to implement car-free developments without the imposition of CPZ on all local streets. Lewisham council needs to look at other ways to ensure car-free developments for the life of these properties.

### **Design & Layout**

We have been disappointed with the three designs presented which are fundamentally the same building with different levels of housing. Of particular concern were the following aspects of the design:

1. The entrance of the leisure centre in all options is on the north side of the development making the public area and entrance north facing with little direct sunlight, but more importantly it is at the furthest point from the library, *'turning it's back to the library'* as some have put it.

2. The link between the leisure centre and library looks like an afterthought rather than properly connecting the main part of the leisure complex to the library, although if a link at the library floor level could be made to work this could be very successful.
3. We would prefer a building that is designed in sympathy with the library with a coherent frontage rather than showing disregard for a fine grade 2 listed building. The design of the centre needs to be improved to compliment the library rather than as a blank modern building to 'avoid diverting attention from the library' – something that option 3 certainly fails to do. The Horniman Museum extension is an excellent local example of how a modern building can be integrated into an existed listed building in a coherent way.

**Problems with specific options:**

4. In Option 3 the seven story development is out of character with the streetscape of Dartmouth Road.
5. The high rise (7 storey) housing is too close to the road, built over the pavement and completely out of proportion to the other side of Dartmouth Road. This results in a strong physical separation between the part of Forest Hill with the pool to the north and the part of Forest Hill with the library to the south.
6. The isolated unit in option 2 for retail and possibly for housing does not fit well with the overall layout of the area and breaks up the public space
7. We are not happy with the scale or location of the housing along the frontage of option 3 and think that this needs serious reconsideration with alternative arrangements and locations explored e.g. along the back of pools building or around the square. There is plenty of room for extra housing to be built above the changing area and car park to the rear of the leisure centre. There are already large trees to the rear of the houses on Derby Hill Crescent that would prevent overlooking from this position. Access could be from the rear of the public space (possibly the same access as the flats aligned with Kingswear House). This is just one solution and we are sure that there are others that could be explored but have not been as part of this consultation.

8. Further housing may be possible above the garages to the rear of the site on Torcross Drive. By redeveloping these garages to providing some residential areas above the garage facilities, less residential development would be needed at the front of the site.
9. The loss on the pocket park is not a significant loss to Forest Hill with Baxter's Field not far from the site and the new public space created on this site.

We hope that prior to awarding the contract for building the leisure centre other design options are considered, ideally opening up the process to a design competition. We understand that these designs were put together primarily to give an idea of bulk and massing and residential unit numbers, but they fail to show how different layouts for the site have been tested. We could easily be stuck with a sub-standard design for decades to come if the process now proceeds too quickly and without careful thought and proper consideration of what is possible, including allowing the architects selected through the OJEU process the opportunity to bring their creative design skills to the project.

### **Options and Bulk**

From the three options presented by the council we believe that option 1 is not right as it does not include a learner pool. Options 2 and 3 both provide a better facility and although we are keen to maximise the leisure and community facilities available on this site, we do not believe that the housing set out in option 3 is the best way to achieve this.

### **Consultation Process**

We have been disappointed with the consultation process for a number of reasons and we do not believe the council have engaged properly with the local community in regard to this development. This beginning sets a bad precedent as we move forward to the implementation phase.

Amongst our concerns are:

1. Lack of different designs available for public consultation.
2. The consultation has been open to people from across the borough, starting off in Catford, rather than focusing on the residents of Forest Hill.
3. Leaflets that were delivered to local residents were delivered too close to the beginning of the consultation and were simple white A4 sheets. In the 2005/2006 consultation the consultation document itself was delivered to every house, this should have been done

again to get maximum feedback. Instead residents have to go to the library to pick up a leaflet or have access to the Internet for the online consultation.

4. The display in the library and the presentation of the three options in the consultation document significantly simplified the options and did not provide the full details that were in the full documentation that was available on the website. Copies of the full consultation document and historical report should have been available in the library to allow visitors to see the full context of the consultation.
5. Despite a feasibility study being undertaken to determine if Louise House and the Superintendent's House could be saved and incorporated into a new development, no designs have been produced to show if a leisure centre could have been fitted in with this development. Many local residents naturally feel angry that this was not presented as an option after the feasibility study was undertaken and concluded that these building could be converted into housing for a small profit.
6. The consultation process took place during school holidays, when many children and parents are away. This will affect the results of the consultation and exclude many of the key users of the pools.
7. A public meeting should have been organised where local residents could have an opportunity to discuss the plans with the council officers and hear the views of other local residents.
8. There has been a lack of clarity for local residents regarding what the consultation is about – housing and leisure facilities or design of buildings and layout. By confusing these two issues it is difficult for the public to know how to respond.
9. We would like to see all the responses to the consultation to get a better idea of the views of local residents before the report goes to mayor and cabinet, so that we can satisfy ourselves that council officers accurately represent the views of local people from this consultation."

### **C.3 Sydenham Society**

"The Sydenham Society is an amenity society covering the SE26 area and areas of interest adjacent to SE26 with a current membership of approximately 1100. At a well attended AGM in April 2008 members made clear their overwhelming opposition to the demolition of Louise House and the frontage block of Forest Hill Pools (the Superintendent's House). The Society accepts that the cost of maintaining the pool tanks presents an unquantifiable future cost but believes that a new pools complex could be built on the site whilst retaining the Superintendent's House and Louise House.

The Sydenham Society believes that the decision taken by Mayor and Cabinet in February has excluded what is best for the community, viz rebuilt pools and retention of the current streetscape. Below we argue why we believe this. If the February decision is not to be reversed, the Society would prefer option 1, as the least damaging to the character of Dartmouth Road, and as carrying the least risk in that its construction is not dependent on the vagaries of the current housing market.

#### **The Forest Hill Urban Development Framework**

The Society objects to the proposed demolition Louise House and the Superintendent's House; the loss of these historic buildings would be irreversible and would damage the unity of this important group of civic buildings. We believe that any redevelopment option which does not retain key elements of the streetscape of this part of Dartmouth Road flies in the face of the Council's own policy as stated in the 2003 supplementary planning guidance.

The Forest Hill Urban Design Framework and Development Strategy was adopted as supplementary planning guidance in 2003. On page 12 of the document it states: *"The Library and Pools complex need to be addressed in terms of celebrating these important buildings, creating a special place and providing an improved amenity for the local community"*.

On page 33 the development context of the Library, Louise House and the Pools is set out:

##### **5.3.1 Development context**

This area consists of the Forest Hill Library (Grade II listed), Louise House, the Forest Hill Pools and adjacent open space...

This key site is independent of the others in terms of programme and use. However it is perceived as an important community centre and, within the

conceptual framework of this study, an important activity node and gateway for Forest Hill. There are ongoing discussions about the uses for the buildings and how the buildings may be improved, combined and / or redeveloped. Feedback from the public consultations is that there is strong support for retaining community / leisure uses on the site. This is suitable as an adjacent use to the Library which will remain. However, decisions must be informed by technical appraisals and feasibility studies with ongoing public consultation.

### **5.3.2 Development principles**

Any improvement or redevelopment should respond to the following urban design principles:

- The building facades fronting the street and public space should be of a high quality whether they are old or new.
- The space in front of the buildings should be quality public realm and not dominated by cars. It could be seen as an extension of the suggested landscaped green space along Dartmouth Road.
- The existing public park north of the Pools should have a more useful function. It provides the opportunity for additional development space and / or parking. If this opportunity is taken this green space should be re-provided in front of the buildings.
- Any new or re-developed buildings should form a positive relationship with the proposed linear green space and should address the longer distance direct from the station.

### **Inappropriate development**

The Society's view is that the three proposed options "turn their back" on the library and are neither respectful of this Grade II listed building nor do they complement it. Each of the options involves construction virtually to the edge of the building line thus losing the key concept of the proposed linear green space.

The Society objects to all three options as being inappropriate to the character of Dartmouth Road; in particular, options 2 and 3 (either a 5 or 7-storey building) appear completely at odds with most of the neighbouring buildings, with the exception of the 60s / 70s blocks of Salcombe and Kingswear Houses, which benefit from generous open space to the front. We understand that a review of the Forest Hill Conservation Area is currently taking place and that there is a possible recommendation that the conservation area should be extended along Dartmouth Road as far as the library. The demolition of the

Superintendent's House and Louise House would destroy the character of this part of Dartmouth Road.

### **Sustainability**

The Society's second plank of objection is on the grounds of aesthetics and sustainability. The architectural richness and civic scale of the existing Queen Anne-style buildings cannot be matched by any early 21<sup>st</sup> century building within a realistic construction budget. The London Plan supports the "recycling" of old buildings as a more environmentally-friendly approach to development. As English Heritage explain in their 2008 *Heritage at Risk Register*, this is due to the concept of "embodied energy": *"In bringing [neglected structures] back to life we not only respect the craftspeople who created them... but also the planet from which they are made. Demolition and replacement means not only losing all of the resources embodied in the original building but also the investment of yet more energy for demolition, the creation and delivery of more building materials, the building process itself and the disposal of the resulting waste. Each year more than 100 million tonnes of construction and demolition materials and soil end up as landfill – roughly half of the UK's total waste."*

### **The "heritage" view**

As a group Holy Trinity School, the library, swimming pools and Louise House are four important civic buildings which lend a "sense of place" to Dartmouth

Road. Built on glebe land gifted to the people of Sydenham and Forest Hill by the Vicar of St Barts, the younger son of the Earl of Dartmouth, they reflect the Victorians' interest in education, health and social care. As a set of buildings they are unique – a fact recognised by English Heritage who have commented on their interest as a group. While Louise House and the Pools are not as embellished as the library they are striking and attractive buildings in the Queen Anne style. In the view of the Sydenham Society their demolition would be a matter for lasting regret and would represent a major loss to the history and built environment of Forest Hill and Sydenham. The craftsmanship that went into the construction of these two buildings cannot now be replicated and the materials from which they were built are too expensive for modern developers.

### **The Council's independent historic report**

The conclusion of the firm of architects who were commissioned to write the historic report on the Pools was that the front elevation was a work of

some merit, and that consideration might be given to its retention and repair insofar as it contributes to the late 19<sup>th</sup> century character of the street, along with Louise House, the library, and school.

### **High-risk strategy**

The Society is of the view that demolition of the heritage buildings and the financing of enhanced leisure facilities by means of high-density housing is a risky strategy in the current economic climate. Housebuilders are reporting major losses and development sites are currently being put on hold. Many commentators foresee a slump lasting from two to three years, with mortgage finance difficult to obtain – particularly for first-time buyers. Locally, this situation is exacerbated by the fact that a number of housing developments are currently under construction in Forest Hill – along with the Berkeley Homes development on Perry Vale a new block is going up at the rear of the Dartmouth Arms and the Print Works has recently been completed.

Funding the pools by means of the sale of flats in a new five or seven-storey building now seems an outdated financial model. It is our belief that in the current credit crunch a development which includes more appropriately scaled family housing, not dependent on sales to first-time buyers, carries less risk. As the Sydenham Society have suggested in its own “indicative” scheme, a mixed development which utilises Louise House and the Superintendent’s House and includes new townhouses and roomy flats would preserve the character of this part of Dartmouth Road and not carry the risk of a mothballed site.

### **Poor consultation process**

The Sydenham Society believes that the consultation process, in not seeking residents’ views on demolition, is deeply flawed; the exhibition and displays of the proposed options give residents only the most generalised idea of what any of the options might look like when actually constructed.

Furthermore, the Society is highly critical of the way in which the consultation process has been carried out. In other recent consultations (eg the 2006 borough-wide consultation on Controlled Parking Zones) local people have received a brochure in the Lewisham “house style” setting out options in graphic form and with a tear-off sheet which could be posted back to the town hall. In contrast, the Forest Hill Pools redevelopment (one of the largest developments in this part of the borough and with great civic importance) has been publicised by a one-

sided white A4 leaflet of the type that could easily be confused with junk mail. Rather than have a document that sets out the various options, residents either had to go online (how many residents have internet access?), visit one of two displays in the car park of Forest Hill Station or go to Forest Hill Library in a period when many families are on holiday. Furthermore, the graphic which illustrates option 3 contains a fundamental error – a line of arched windows is indicated in the eastern elevation of the library. These windows do not exist, and there is no plan to construct them if option 3 is chosen.

### **Architectural competition**

The Sydenham Society believes that an architectural competition should be held to select the architects who will be commissioned to take on the project. The options on offer are indicative scenarios showing concept, bulk and massing. We believe that a fourth design brief should be tabled in which architects are required to preserve the Dartmouth Road streetscape and to respond more closely to the key precepts of the Urban Design Framework.

### **No demolition before planning permission**

In our view Louise House and the Superintendent's House should not be demolished until planning permission has been obtained as this will give further opportunity for any new scheme to be thoroughly tested by the planning process."