#### Introduction

- 1.1 This objection statement has been prepared by Richard Parry. It follows the structure of the planning statement submitted by William Berger on behalf of House of Noise Ltd<sup>1</sup>. The statement has been provided in objection to a retrospective planning application and ongoing breach of permitted use constituted by the continued operation of Lewisham Way Community Centre as private offices, against the premises permitted use, community centre (F2b).
- 1.2 In order to provide a clear objection to the ongoing breach of leasehold terms by the continued operation of Lewisham Way Community Centre as private offices, this statement includes:
  - A description of the application site and surrounding area
  - An overview of the current scheme
  - A review for the relevant national and local planning policy guidance
  - An appraisal of the current scheme against its planning policy context

### 2 Application Site and Surrounding Area

2.1 138 Lewisham Way was continuously operated as an Afro Caribbean Youth and Community centre for 44 years from 1972 until 2016. The Community Centre remains listed on Lewisham Council's website as "a multi-purpose building that offers educational and enrichment activities for children, young people and adults from within the wider community<sup>2</sup>". Multiple programmes run from the space included:

<sup>&</sup>lt;sup>1</sup> Berger, W., 2021. Planning Statement Change of Use 138 Lewisham Way, LondonSE14 6PD. On behalf of: House of Noise Ltd. [online] https://planning.lewisham.gov.uk. Available at: <a href="https://planning.lewisham.gov.uk/online-">https://planning.lewisham.gov.uk/online-</a>

applications/files/7E20C878BF1DAD701B873C0EE47592D9/pdf/DC\_21\_120491-PLANNING\_STATEMENT-970943.pdf> [Accessed 5 May 2021].

<sup>&</sup>lt;sup>2</sup> https://lewisham.gov.uk/organizations/lewisham-way-youth-and-community-centre

- Community Choir
- Music Production
- Black Women's Group
- Women's mentoring
- Mentoring Group
- Young Father's Group
- Stop n Soup
- Numeracy and Literacy
- Heritage Classes
- Family Support
- Black Father's Support Group
- GEMS Group
- Mentoring
- Discovering Science

This part of London played a significant role in the development of reggae in Britain and is home to important sound systems like Jah Shaka and Saxon Studio. It is where Lover's Rock records were first made, and many female Londoners sung an 'ethic of loving blackness' into being in politically harsh and hateful times. We argue these experiments with telling reggae's story differently offer more open and inclusive forms of learning, for reggae is simultaneously a form of 'local knowledge' and an 'outernational perspective' that is both embedding in a place but never confined or rooted to it.<sup>3</sup>

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<sup>&</sup>lt;sup>3</sup> Henry W.., Back L. (2021) Reggae Culture as Local Knowledge: Mapping the Beats on South East London Streets. In: Henry W.., Worley M. (eds) Narratives from Beyond the UK Reggae Bassline. Palgrave Studies in the History of Subcultures and Popular Music. Palgrave Macmillan, Cham. https://doi.org/10.1007/978-3-030-55161-2 3

#### - Professor Les Back

If the prior Youth and Community Centre had received the same affordances from Lewisham Council as the current media company<sup>4</sup>, 138 Lewisham Way would still be a Community Centre. If the community centre's leasehold terms ware enforced, 138 Lewisham Way would still be a Community Centre. It is incorrect to suggest there isn't, wasn't, or won't be needs for a local community centre at 138 Lewisham Way. The 2017 Lewisham Poverty Commission Report offers a snapshot of how residents value community centres in terms of poverty, underdeveloped employment skills and strengthening support within circumstances intensified through COVID- 19 and Black Lives Matter.

2.2 In 2018, the community hall situated in the rear yard of 138 Lewisham Way was demolished and removed from the premises. The floor area (GIA) of this building was approximately; 70m2 at ground floor level<sup>5</sup>

"We had big sound system dances out the back and they used to do everything from black history to martial arts, but reggae was central...

Places like this – they were safe spaces. It's important how close things were – it was a whole world. And it was a black world, hosted by black people. And that was really powerful and important."

Dr. Lez Henry<sup>6</sup>

<sup>&</sup>lt;sup>4</sup> Such as commercial revenue-generating use through permission to operate private business, and reduce outgoing expenditure by closing to the public, for example.

<sup>&</sup>lt;sup>5</sup> See Appendix 1.

<sup>&</sup>lt;sup>6</sup> Finamore, E., 2018. Sound people. [online] The Lewisham Ledger. Available at: <a href="https://lewishamledger.tumblr.com/post/178173989606/sound-people">https://lewishamledger.tumblr.com/post/178173989606/sound-people</a> [Accessed 2 May 2021].

2.3 Under the existing use the premises had not been squatted. The retrospective applicants appointed live in property guardians to ensure the premises were not squatted. The community centre had not been boarded up. Temporary security screens had been fitted. The property had not been left in a state of disrepair<sup>7</sup>.

## 3. The Retrospective Proposal

- 3.1 The retrospective proposal entails authorising an unauthorised change of use, from an established community centre, to an exclusively operated private business premises for House of Noise Ltd., and changes to the existing built structure by the removal of a community hall in 2018, and construction of a covered structure spanning the width of the yard<sup>8</sup> from 2018.
- 3.2 The retrospective applicants were operating from the premises in 2018<sup>9</sup>. Since 2019 the retrospective applicants have exclusively operated the community centre as their private business premises, supporting a 2,610% increase in their business's private capital and reserves.<sup>10</sup>. The retrospective applicant's Prior Approval application to change the community centre's permitted use was refused in 2019.<sup>11</sup> The retrospective applicant is applying for retrospective planning permission to avoid accountability for operating the community centre exclusively as their private business premises closed to everyone outside their private personal networks.
- 3.3 It should be noted here that the retrospective applicants have proceeded with an office use in bad faith, as demonstrated by undertaking actions predicated on a

<sup>&</sup>lt;sup>7</sup> See Appendix 3.

<sup>8</sup> See Appendix 2.

<sup>9</sup> Ibid.

<sup>10</sup> See the filing history: HOUSE OF NOISE LTD Company number 08803288

<sup>11</sup> See Berger, W., 2021. Prior Approval application for change of use number DC/20/117174. [online] https://planning.lewisham.gov.uk/online-

applications/applicationDetails.do?previousCaseType=Property&keyVal=\_LEWIS\_DCAPR\_105093&previousCaseNumber=\_LEWIS\_PROPLPI\_294055\_1&previousCaseUprn=100023569839&activeTab=summary&previousKeyVal=\_LEWIS\_PROPLPI\_294055\_1> [Accessed 5 May 2021].

prior knowledge of the premises current use class. For example, being present and active on the site before 2019<sup>12</sup>; Making a Prior Approval application to change the community centre's permitted use in 2019; Removing a sign spanning the width of the building reading "Lewisham Way Youth and Community Centre in 2019<sup>13</sup>" and legally acquiring the building's leasehold on the basis of permitted use. The community centre particulars, prepared by Hindwoods Chartered Surveyors<sup>14</sup> contradict any inference that the retrospective applicants somehow bought a community centre by mistake:

The premises benefit from D1 planning consent. Other commercial uses will be considered subject to planning. However, the ingoing tenant must make their own enquiries of the planning authority to ensure that the proposed use is permissible prior to entering into any form of contract...

"You should be aware that the Code for Leasing Business Premises strongly recommends you seek professional advice from a qualified surveyor, solicitor or licensed conveyancer before agreeing or signing a business tenancy agreement. The Code is available through professional institutions and trade associations or through website www.leasingbusinesspremises.co.uk".

These particulars are believed to be correct, but their accuracy is not guaranteed, and they do not constitute an offer or form any part of any contract. Hindwoods and its employees have no authority to make any representation or give any warranty in relation to this property<sup>15</sup>

3.5 The retrospective applicants conflate an unevidenced local demand for flexible office workspace with their own pre-emptive registration of the address as

<sup>12</sup> See Appendix 2.

<sup>13</sup> See Appendix 3.

<sup>&</sup>lt;sup>14</sup> Hindwoods Chartered Surveyors, 2017. 138 LEWISHAM WAY, LEWISHAM, SE14 6PD TO LET. [online] London: Hindwoods Chartered Surveyors, p.1. Available at: <a href="https://realla-

<sup>&</sup>lt;sup>15</sup> media.freetls.fastly.net/uploads/property/brochures/original/SWgtbRKSxK7zMw6Rz\_wTHA> [Accessed 3 May 2021].

their business premises, and their subsequent exclusive operation of it in the private interests of their media company. The building hasn't been used better – it has been shut to the local community for over 2 years. The unevidenced aspirations of social and economic benefit, only exist in terms of themselves. The adjoining building, Lewisham Arthouse, remains offering local communities flexible, shared workspaces at an intensified scale since 1995 - overseen by resgitested Trustees. There is no benefit in erasing a historic, safe space developed over generations by Black communities on this basis.

The New Cross area, in particular the London borough of Lewisham, was notorious as a hotbed of National Front activism and racist arson attacks. In 1977, the Moonshot, a black youth and community centre, was fire-bombed. That year Lewisham also witnessed street battles between National Front supporters on the one hand and anti-racists from the Anti-Nazi League, supported by black youths, on the other. In 1978, the Albany Theatre in Deptford was fire-bombed in a suspected racist attack, as was the Lewisham Way Centre in 1980. The New Cross fire was, therefore, not an isolated act of barbarism, but the latest and most devastating in a history of racist terror.

### -Linton Kwesi Johnson<sup>16</sup>

- 3.6 It should be noted that under the existing use (F2) the rooms on the first and second floor had not been used as ancillary office spaces. The rooms were used for counselling, therapy and teaching spaces across various social contexts.
- 63.7 Having been already operated for at least 2 years by the retrospective applicants, there appears to be no evidence of the facilities ever having been made available for local charities, Not For Profit, or community organisations to meet on an any basis, or ever having been used in this way. Other than as appearing an unpaid agent for the

<sup>16</sup> La Rose, J., Johnson, L. and John, G., 2011. The New Cross massacre story. London: New Beacon Books.

Retrospective Applicant's media company - alongside any means to minimise Business Rates - the retrospective applicant's "Honestly Space" Community Interest Company for the 'letting and operating of own or leased real estate' and 'Operation of arts facilities' has remained dormant since they incorporated it in 2019.

- 3.8 The retrospective applicants uses the property exclusively as the offices and premises for their private business as House of Noise Ltd.
- 3.9 Details of the ongoing uses are set out below:

### **Ground Floor**

Flexible storage, personal use, and corporate entertainment space for the retrospective applicants and their private business. No public access.

# First & Second Floor

Private office spaces used exclusively by the retrospective applicants for their private business. No public access.

#### Basement

Private recording studio facilities used exclusively by the retrospective applicants for their private business. No public access.

## **4.Planning Policy Context**

4.1 The retrospective application Planning Statement selectively quotes from a national assessment framework that doesn't recognise local community contexts, and priviliges unevidenced claims. This misrepresents the full planning policy context.

4.2 The National Planning Policy Framework sets out the Government's position on the role of the planning system in both plan-making and decision-taking. Further principles relative to this case are:

#### **Enforcement**

58. Effective enforcement is important to maintain public confidence in the planning system. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. They should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where appropriate.

## Strategic policies

- 20. Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation

### **Pre-application engagement and front-loading**

39. Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better

coordination between public and private resources and improved outcomes for the community.

40. Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.

### Tailoring planning controls to local circumstances

- 51. Local planning authorities are encouraged to use Local Development Orders to set the planning framework for particular areas or categories of development where the impacts would be acceptable, and in particular where this would promote economic, social or environmental gains for the area.
- 52. Communities can use Neighbourhood Development Orders and Community Right to Build Orders to grant planning permission. These require the support of the local community through a referendum. Local planning authorities should take a proactive and positive approach to such proposals, working collaboratively with community organisations to resolve any issues before draft orders are submitted for examination.
- 53. The use of Article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities). Similarly, planning conditions should not be used to restrict national permitted development rights unless there is clear justification to do so.

- 8. Promoting healthy and safe communities
- 91. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages.
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas; and
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- 92. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:
- a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
- b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;

- c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
- d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
- e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience
- 128. Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants

should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

- 182. Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.
- 4.3 The Lewisham local development framework sets out the Council's position on the role of the planning system in both plan-making and decision-taking. The principles relative to this case include:

## **Core Strategy Policy 19**

Provision and maintenance of community and recreational facilities

1. The Council will work with its partners to ensure a range of health, education, policing, community, leisure, arts, cultural, entertainment, sports and recreational facilities and services are provided, protected and enhanced across the borough. The work of the Lewisham Infrastructure Delivery Plan and the relevant corporate plans and strategies of partners will be used to inform provision.

- 2. The Council will apply the London Plan policies relating to healthcare, education and community and recreational facilities to ensure: a. there is no net loss of facilities b. the needs of current and future populations arising from development are sufficiently provided for c. the preferred location for new uses will be in areas that are easily accessible and located within close proximity of public transport, other community facilities and services and town and local centres d. co-location of services and multi-use facilities are encouraged and supported e. a safe and secure environment is created and maintained and clubs
- 4.4 The Lewisham Local plan sets out the Council's position on the main issues and preferred approaches to the planning. The principles relative to this case include:

Character-led growth: The character of our neighbourhoods is highly valued and must inform the growth strategy. The Lewisham Characterisation Study indicates where the existing character of areas may be reinforced, re-examined or reimagined.

Local character: Lewisham's growth must be carefully managed so local character is enhanced and not harmed.

Inclusive places: To create more inclusive places, buildings and spaces must be easy to access and use for people of all ages and abilities and at different stages of life.

Understanding heritage: Our heritage assets are irreplaceable. Their value must be understood if they are to be preserved for future generations.

The poor condition and possible closure of older community facilities: Whether there will be enough community facilities (such as surgeries and schools) to meet extra demand as the borough grows.

Community facilities should be open to everyone. Where they are not free to use, they should be affordable to local residents.

Highly valued facilities include Libraries Youth centres Leisure and recreation centres.

Community facilities are important to health and wellbeing and should be protected.

#### North area

Deliver heritage-led regeneration schemes to preserve and enhance Lewisham's industrial and maritime heritage, as well as the character and cultural identity of historic high streets at Deptford and New Cross. Ensure Deptford market remains a vibrant hub at the heart of the community.

# **5.Determining Issues**

The retrospective application Planning Statement selectively quotes determining issues, with unevidenced, misleading, impartial and incorrect claims, risking misrepresenting the current planning policy determining issues.

- 5.1 138 Lewisham Way was continuously operated as an Afro Caribbean Youth and Community centre for 44 years from 1972 until 2016. The Community Centre remains listed on Lewisham Council's website as "a multi-purpose building that offers educational and enrichment activities for children, young people and adults from within the wider community. Lewisham Way community centre would still be in use, had the individuals in question followed the leasehold terms. The social disenfranchisement of local Black communities and the erasure of the community centre's vital social histories are omitted through the retrospective applicants retrospective ignorance.
- 5.2 Beyond securing commercially favourable terms for the retrospective applicants private business, the retrospective applicants provide no evidence of an unmet need for shared workspace, or having succeeded in meeting this need through their operations of the last 2 years.
- 5.3 The change of use does not make efficient use of the existing building. The basement and upper floors are effectively privatised, through their exclusive management and operation by the retrospective applicants as House of Noise Ltd. The Ground floor offers a flexible storage and entertainment space for the retrospective applicants and their private business. The Community Interest Company, incorporated by the retrospective applicants, remains dormant. since it' creation. In its current use, having been operated for at least 2 years by the retrospective applicants, there appears to be no evidence of any economic, social or environmental function other than by the exclusive operation of their private business.

The retrospective applicants provide no evidence of making efficient use of the building, such as by it being open, and there is no acknowledgement of the community hall's disappearance in 2018.

5.4 Under the existing use class, the property was not disused and left in a state of disrepair. The community centre's vacation was predicated on the leasehold acquisition process. Any dereliction was actively intensified by the retrospective

applicants themselves, by appointing live in property guardians without supplying sufficient domestic refuse facilities. The community centre would still be accessible, had the individuals in question followed the terms of their leasehold. In it's current use, having been operated for at least 2 years by the retrospective applicants, there appears to be no evidence of the property providing any economic, social or environmental function beyond the exclusive operation of their private business.

5.5 As a community centre there was no risk and fear of crime, and the use of the premises as such actively engaged with reducing the risk and fear of crime<sup>17</sup>. After the lease had been reassigned, the property was not vacant. The retrospective applicants appointed live in property guardians to ensure the security of the premises and to preclude any squatting. There is no evidence of any squatting or damage to the property. The retrospective application for a change in use misrepresents the prior (current) community centre use as "Property Guardian home<sup>18</sup>".

"Closure will have an impact on the way young people choose to resolve conflicts... they will have less options unless people are giving them guidance to stay outside of the criminal justice system."

Everton Augustus<sup>19</sup>

5.6 In it's current use, having been operated for at least 2 years by the retrospective applicants, there appears to be no evidence of any flexible employment land being made available to anyone outside the exclusive operation of their private business.

<sup>&</sup>lt;sup>17</sup> See Appendix 4.

<sup>&</sup>lt;sup>18</sup> Berger, W., 2021. Application for Planning Permission. Town and Country Planning Act 1990 [online] Planning service, London Borough of Lewisham. Available at: <a href="https://planning.lewisham.gov.uk/online-">https://planning.lewisham.gov.uk/online-</a> applications/files/DB9DA6C33DDACFAD86C803DBF036E23B/pdf/DC\_21\_120491-APPLICATION\_FORM-970940.pdf>

<sup>&</sup>lt;sup>19</sup> East London Lines. 2011. Lewisham youth and community centre is facing closure after 34 years due to losing Council funding. [online] Available at: <a href="https://www.eastlondonlines.co.uk/2011/12/community-centre-">https://www.eastlondonlines.co.uk/2011/12/community-centre-</a> forced-to-seek-alternate-sources-of-funding/> [Accessed 2 May 2021].

- 5.8 In it's current use, having been operated for at least 2 years by the retrospective applicants, there appears to be no evidence of the building serving the local community. It remains closed, only accessible to the retrospective applicants and their commercial clients.
- 5.9 In it's current use, having been operated for at least 2 years by the retrospective applicants, there appears to be no evidence of their leasehold of the property benefitting any local amenities.
- 5.10 In it's current use, having been operated for at least 2 years by the retrospective applicants, there appears to be no evidence for the premises providing a positive force for mental-wellbeing. Rather, the enclosure and erasure of this community centre in such a cynical way resembles a highly localised form of gaslighting. Where the retrospective misrepresentation of intentions and activity disenfranchise local communities and erase their spatial vitalities. The racial aspects of local such planning processes risk appearing encoded into the built environment, through such enclosure of community space for exclusive, a-historical reissue.
- 5.11 The application site has always been a community centre, for 44 years from 1972 until 2016. For the retrospective applicants to suggest the premises has been used as an office space for two years without any complaint or concern is untrue. Over the summer of 2018 the retrospective applicants received complaints in person following their post-community centre pergola construction processes which subsequently became a covered structure, spanning the width of the yard. For example, during public events over the 2018 Lewisham Art House Open Studio weekend.

My concern is how this properties use has changed.

When I first came to London in the 90s I volunteered at the Lewisham Way Youth and Community Centre that was based at 138 Lewisham Way.

It was an Afro Caribbean youth centre, providing support, training and activities for the local black community and not just for youth but for all age groups. Due to cuts and austerity measures from government they lost their funding, as did most youth and community services. This was a real blow to the local community.

It subsequently lay empty then had a guardianship scheme.

The current lease holders, I'm informed secured the lease as they were going to provide a music centre/hub which would be Community facing. I have seen no such activity and it seems to be a space used by a few people for their own benefit.

The fact they are now trying to change its use... seems abhorrent considering what the space used to deliver to the local Community<sup>20</sup>.

The group running the space primarily makes music for a living - I believe soundtracks, backing tracks and other similar projects (think synthesisers and computers). Having an affordable space that they could do this in was the driving force in getting the building in the first place<sup>21</sup>.

They obviously won't even set up anything once they have permission beyond a couple of mates renting desks out. maybe not even that<sup>22</sup>.

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#### 6.Conclusions

Neither the Retrospective Proposal, nor the premise's operation over the least 2 years qualify or address any need for flexible co-working space. Operating in breach of the premise's permitted use for over 2 years by the retrospective applicants, there

<sup>&</sup>lt;sup>20</sup> Thurnhill, R., 2020. Very Concerned re planning application re our neighbour 138 Lewisham Way. [email].

<sup>&</sup>lt;sup>21</sup> Barnes, C., 2020. Very Concerned re planning application re our neighbour 138 Lewisham Way. [email]

<sup>&</sup>lt;sup>22</sup>Carpenter C., 2021. good bants. [email].

appears to be no evidence of a community being supported, sustainably or otherwise. There is clear evidence of the local community being socially and spatially disenfranchised.

- 6.1 The premise's unauthorised change of use and continued operation for at least 2 years have resulted in the privatisation of the property through the terms of its permitted use being broken and remaining unenforced. The community centre remains exclusively operated as a private business closed to everyone outside the media company's exclusive corporate context. The retrospective applicants supply no evidence demonstrating a clear local demand for shared, scalable workspace, other than mentioning the adjoining building in passing Lewisham Arthouse, a nationally-recognised provider of creative workspace and facilities, operating at a socially-meaningful scale<sup>23</sup>.
- 6.2 In it's current use, having been operated for at least 2 years by the retrospective applicants, there appears to be no evidence of any small and medium-sized enterprises working within the creative industries having access to, or presence in the building, other than the retrospective applicants themselves. There appears to be no unassociated evidence of any flexible or affordable co-working spaces, or support being provided to the wider local economy.
- 6.3 In it's current use, having been operated for at least 2 years by the retrospective applicants, there appears to be no evidence of creating any full or part-time jobs for local residents, other than through the historic appointment of temporary live-in property guardians who may have been living as such.
- 6.4 This Objection Statement has set out the unworthiness and unacceptability of the retrospectively proposed change of use application for the Lewisham Way Community Centre.

<sup>&</sup>lt;sup>23</sup> Lewisham Arthouse. 2021. About - Lewisham Arthouse. [online] Available at: <a href="http://www.lewishamarthouse.org.uk/about-2/">http://www.lewishamarthouse.org.uk/about-2/</a> [Accessed 5 May 2021].

Appendix 1: Demolished and disappeared community hall

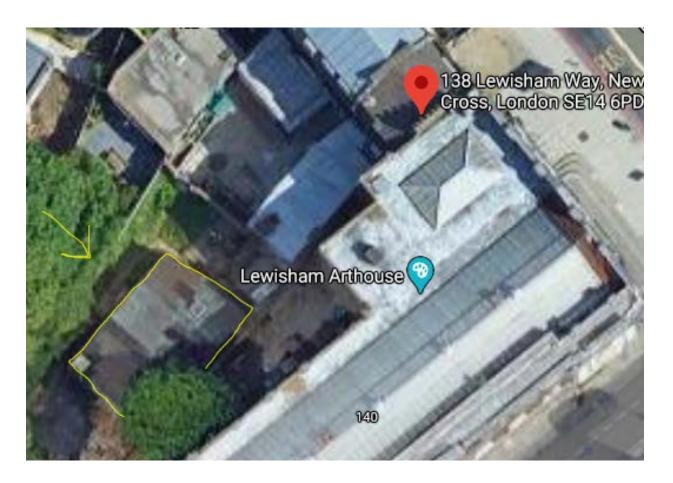


Image description: Google maps satellite view of 138 Lewisham Way, including a large flatroofed structure visible in the yard to the rear of the property, outlined with a superimposed yellow line with a similarly hand-drawn yellow arrow pointing at it. This image was retrieved from Google maps on 14th April 2021



Image description: screenshot of the buildings constituting Lewisham Way Community Centre, including a large yellow-highlighted area in the yard to the rear of the property. This image was retrieved from the particulars of Harwood Chartered Surveyors when the leasehold was marketed for sale.

Appendix 2: Prior use of the Community Centre by the retrospective applicants.

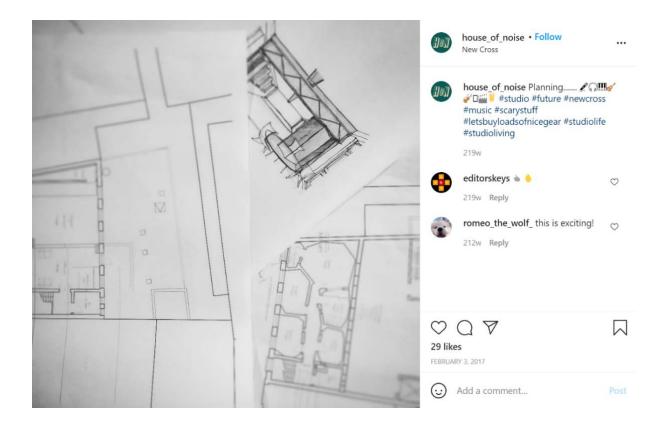


Image description: a black and white augmented-reality image dated February 3, 2017 showing floorplans conforming to the layout of Lewisham Way Community centre in the possession of the retrospective applicants. Appended with hashtags the last of which read "#letsbuyloadsofnicegear" "#studiolife" "#studioliving"



Image description: a covered structure, previously a pergola – which the Directors were witnessed as constructing throughout the summer of 2018 by users of the adjoining building, Lewisham Arthouse

# **Appendix 3: Images of the Community Centre.**



Image description: Lewisham Way Community Centre in 2016. Note the visibility and availability of access to the space from the street through the, door and transparent frontage, with regular opening hours to the public prominently displayed on a blue noticeboard. Note the permitted use emphasised by the prominent sign spanning the full width of the building, which remain in place until it's removal by the current occupants in 2019.



Image description: Lewisham Way Community Centre following the Youth and Community Centre's vacation – note the temporary security screens, signs confirming the presence of live in property guardians and alterations made to frontage to accommodate the presence of live in property guardians.



Image description: 138 Lewisham Way in 2021. Note the obscured interior space and inoperable door from the street with a closed-circuit television camera and no public indication as to the operation of the space. Note the removal of the 2 "Lewisham Way Youth and Community Centre" signs above a planter containing dead daffodils with the presence of retrospective planning notices to one side.



Image description: a group of 12 standing smartly-dressed youths<sup>24</sup>, some peering around the shoulders of those in front and with one speaking into a broadcast microphone return the viewer's gaze. They are standing together inside Lewisham Way Youth and Community Centre with various notice pinned to the sky-blue walls. This image is from short film about street violence, made by young men in Lewisham in conjunction with their 'Gangs in the Streets of London' project supported by Lewisham Way Community Youth Centre.<sup>25</sup>

<sup>24</sup> Ryan Thomas, Ashley Gordon, Gavin Fowler, Markushaquile Marcus & Tyrone Massiah, Lenroy Kerr, Femi Fatusim, Nebenzial McLean, Tyrell Bennett, Rheiss Carty

<sup>&</sup>lt;sup>25</sup> Youtube.com. 2007. Lewisham Guns. [online] Available at:

<sup>&</sup>lt;a href="https://www.youtube.com/watch?v=ks\_xR1WZ\_68">https://www.youtube.com/watch?v=ks\_xR1WZ\_68</a> [Accessed 5 May 2021].



Image description: a group of eight people in a shared space inside Lewisham Way Youth and Community Centre, with one woman standing up addressing the rest of the room, out of shot. Most people are sitting around a table, listening and in thought, others are seated facing towards audio visual equipment focus on areas of pre-existing activity. This image was extracted from the 25 mins edit of the film project called Engaging the youth - We can speak for ourselves!<sup>26</sup> where young people to present a more representative view of their situation as citizens in the Lewisham Borough, highlighting their perspective by giving them an active voice. This is a short version of the documentary the young people made as part of the Home Office Ending Gang & Youth Violence initiative funded by Lewisham Youth Services.

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<sup>&</sup>lt;sup>26</sup> Youtube.com. 2013. Engaging the youth - We can speak for ourselves! [online] Available at: <a href="https://www.youtube.com/watch?v=gNdBFY632b4">https://www.youtube.com/watch?v=gNdBFY632b4</a> [Accessed 5 May 2021].



Image description: Lewisham Way Community Centre on Friday 6th September, 2019 -Note the presence of culture as local knowledge through the Thinking On The Move conference, with groups of people participating in 'reggae walks' through landscape and discussions around how these community forms of knowledge resulted in living community spaces<sup>27</sup>

<sup>&</sup>lt;sup>27</sup> Henry W.., Back L. (2021) Reggae Culture as Local Knowledge: Mapping the Beats on South East London Streets. In: Henry W.., Worley M. (eds) Narratives from Beyond the UK Reggae Bassline. Palgrave Studies in the History of Subcultures and Popular Music. Palgrave Macmillan, Cham. https://doi.org/10.1007/978-3-030-55161-2\_3

TONY CUMMINGS
of HIGHER RANKIN
promotions
promotions
ENID FORBES
WINSTON FORBES
JOE GIBBS RECORDS
LEWISHAM WAY CENTRE
LEWISHAM YOUTH CENTRE
MOONSHOT YOUTH CLUB
THE REVOLUTIONAIRES
SOUND SYSTEM
RIVERSIDE YOUTH CLUB
ST MARKS CENTRE
TERRY STUART
and all the people of Lewisham
who made this film possible.

Image description: credits from the 2011 Menelik Shabazz film in the "romantic reggae" genre, entitled The Story Of Lover's Rock, one of the highest grossing documentaries in UK cinemas. He described it as a "fusion documentary": "It looks at lover's rock through interviews, comedy, live performance, dance and archive footage. It tells the story of its south London origins to success in Japan and becoming a global brand. In between, we look at the underground scene around the music – its intimate dance, the soundsystems, the social backdrop in the volatile era of the 70s and 80s.<sup>28</sup>"

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<sup>&</sup>lt;sup>28</sup> The Story of Lover's Rock. 2011. [film] Directed by M. Shabazz. London: ArtMattan Productions, Indie Rights, Verve.