

22nd May 2019

Dear Examiner,

I am the Councillor for Canary Wharf ward, first elected in 2014 and was involved in the original 2016 planning application, speaking against it at the LBTH Strategic Development Committee in April 2016 and then at the GLA. I also live about 3 minute's walk away from the site and pass it almost every day.

But my opposition in 2016 was mainly based on the wind issues affecting the sailing centre, it was an otherwise good development that I came close to supporting and it is regrettable that it has not been implemented.

I oppose this new larger application for the following reasons.

LBTH have said they will object for the following four reasons which I support. I would like to add the following pieces of evidence to each item.

New Local Plan refers to the LBTH Local Plan 2031 Regulation 19 tracked changed version of plan, used in the most recent examination. OAPF refers to the draft Isle of Dogs and South Poplar Opportunity Area Planning Framework released May 2018 and the accompanying documents.

1. Townscape and visual impact

a. Previous planning appeal

- i. Planning Appeal APP/E5900/W/18/3194952 49-59 Millharbour, 2-4 Muirfield Crescent and 23-39 Pepper Street. Examiner Paul Jackson B Arch (Hons) RIBA
- ii. This line in Point 22 page 5 of that appeal decision is directly relevant *"It was accepted at the Inquiry that the 'step down' principle would not be offended by variations in height, if the trend of reducing height overall remained clear."*
- iii. That is not the case with the new Printworks application which exceeds the height at which step down works.

b. New Local Plan site allocation 4.12 Westferry Printworks says under Design Principles *"protect and enhance the setting of the Maritime Greenwich world heritage site and other surrounding heritage assets, including the historic dockside promenade"*;

c. The 20 storey contour lines in the following two maps go through this site and clearly indicate that anything taller than 20 storeys is a cause for concern:

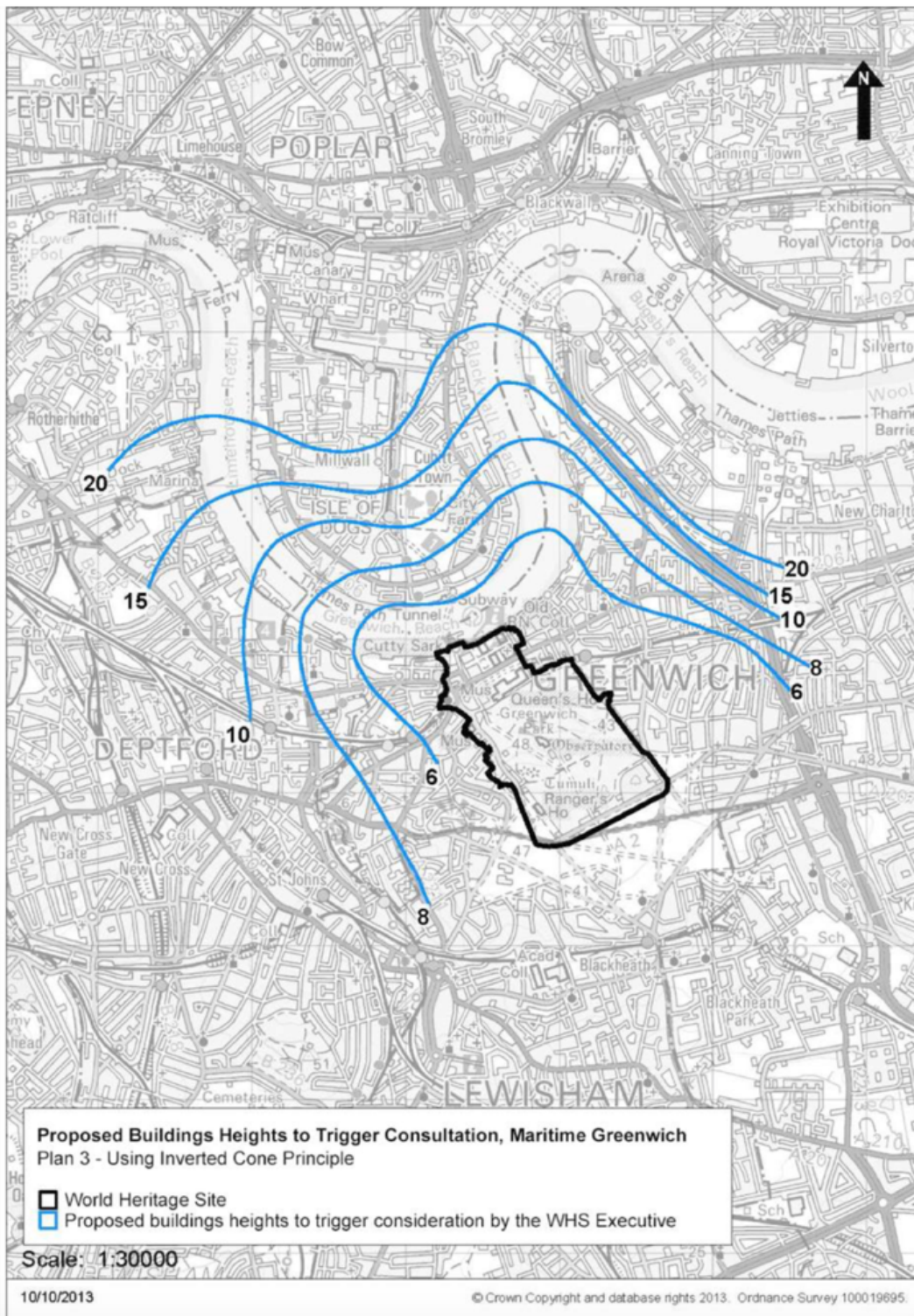
- i. First map is from the Maritime Greenwich World Heritage Site [Management Plan](#), Third Review, published in 2014
- ii. Second map is from the Greenwich Foundation produced [Maritime Greenwich - Important Views and Tall Buildings](#) study published in 2006. It is a framework to assist the assessment of development proposals affecting the World Heritage Site, it says *"If unchecked or poorly managed, the continuing expansion of tall building*

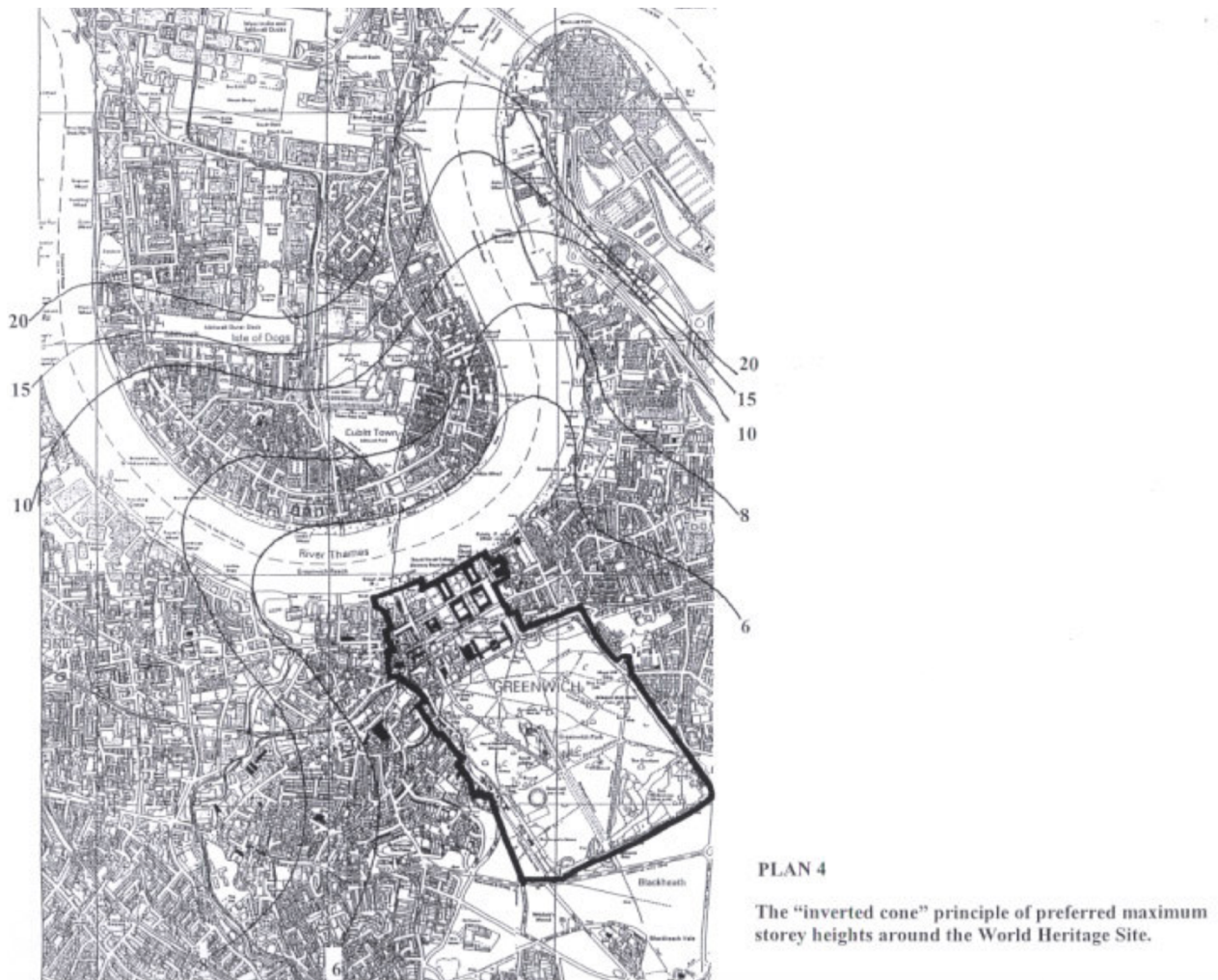
clusters westwards on the Isle of Dogs, and in particular in the South Quay development area, could have an adverse impact on London's skyline and the setting of the World Heritage Site." In 2006 they did not foresee how development would also move south.

iii. Both can be found in this link:

<http://www.greenwichworldheritage.org/about/management-plan>

Plan 3





2. Wind Impact on the Docklands Sailing Centre

- a. In 2016 an alternate building layout was presented which had been wind tested as part of the 2016 application. It tested a scenario with the main tall buildings being built on a south-west to north-east axis rather than east-west along the dock edge. This was shown to dramatically reduce wind flow issues onto the docks.
- b. It is unclear why this new application did not take the opportunity to change the layout to better resolve this issue given that the developer knew this in 2016.
- c. A south-west to north-east axis alignment would have allowed a park to be built up to the dock side and for future resident's better views to the west or east. Where I live, I have similar views to the west & east and know future residents on the lower floors of the towers would benefit from this change in terms of their views to the east and west.

3. Affordable housing - amount

- a. A number of other local developments have offered 35% affordable housing or better.
- b. Given that Northern & Shell bought this land at what I must assume was a good price in the early 1980's for a print works the value of the land (regardless of how dealt with in the viability testing) will not be a material financial issue from a cashflow point of view in

2019 when it comes to the sites development (I am a qualified accountant). This should affect any claims made by the developer about site viability.

4. Housing mix and choice

This is the most family friendly location in my ward which is the most important centre of new residential and office development in the UK. Next to a primary and secondary school, with its own large park, sports facilities on site or next door in Tiller road, all of the child play space is on site unlike most developments in my ward, next to the sailing centre where children can pursue water sports. It is deeply regretful that this scheme is trying to offer fewer 3 bedroom or larger homes than sites in less family friendly areas. If anything, this site should have an above policy mix of 3 & 4 beds.

Additional reasons

I believe the following material planning considerations (taken from a list of material planning considerations in the LBTH constitution) are also relevant reasons for a refusal. I can provide evidence of which policies they fail but with a deadline of 22nd May I do not have time now to detail them now (can provide later) but I believe many of them are mentioned in the Councils report.

1. Adverse impact on nature conservation interests & biodiversity opportunities:

Water quality issues in dock from:

- That rain water runs off into the dock rather than into a sewer potentially carrying pollutants with it i.e. dog faeces. Locally it is obvious that some dog owners are both too lazy to walk to the nearest dog area in Sir John McDougall Park or to bag their own dog's faeces.
- That to save energy a heat exchanger is using dock water - good for the climate maybe not good for the docks as may change water temperature. Other schemes are doing the same in the docks so there needs to be a study of the cumulative impact of such use.

The combination of pollutants and temperature changes on people using the dock water for water sports needs to be tested. Canal & River Trust will I understand receive financial compensation for both to happen so are not neutral arbiters. Longer term there is a desire to introduce a Lido in the docks.

2. Layout and density of building design, visual appearance and finishing materials;

The location of T5 building in particular conflicts with:

- a. The two site allocations in the new Local Plan – Westferry Printworks and Millharbour South, see pictures of maps below.
- b. The map in the Isle of Dogs and South Poplar OAPF 5.4.5 page 107 which clearly shows a preference for a large park at the T5 location.
- c. Both the Local Plan and the OAPF were trying to create the largest possible park at this location but T5 building location means park is smaller as a result – it is one of only 2 opportunities in my ward to create a new large park close to where tens of thousands of people will be living

- d. Tower T5 conflict with Millharbour South site allocation – so close to the border 5 meters away that it may restrict the future development options for this site allocation which has already been squeezed by developments to the north.
- e. T5 should be moved away or removed all together.

Figure 46: Millharbour South

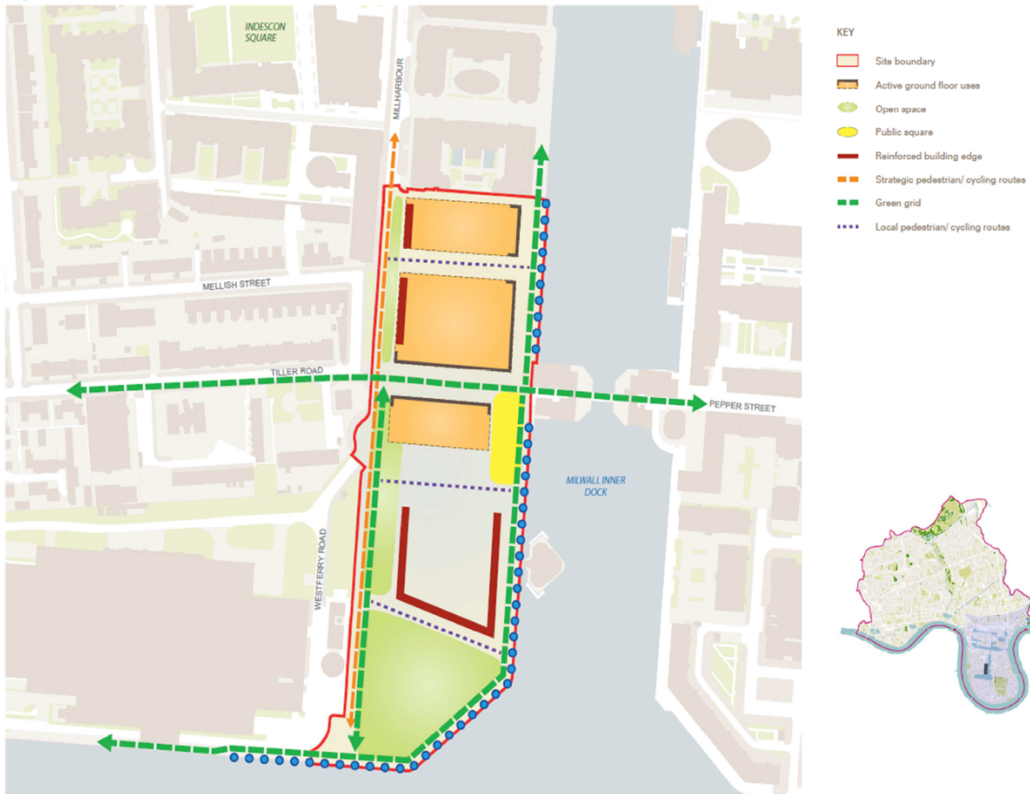


Figure 51: Westferry Printworks





Wind issues on land

increases in wind speeds within the development outside the relevant Lawson criteria necessitating mitigation. No detail on mitigation.

Light issues

From the LBTH Committee report. Interior daylight - 2,212 residential rooms tested - 93% would meet or exceed the minimum British Standard for ADF. 161 tested rooms (7%) fail. Sunlight – 95.7% of living rooms would receive direct sunlight for part of the years.

This is not an inner-city urban location surrounded by tall buildings restricting light, no other building is tall enough nearby to affect the light into windows and those that are, are to the north. That not 100% of the rooms are compliant is almost entirely due to how close together the buildings are. There is no reason that they cannot be 100% ADF compliant on this site. A less dense development could achieve 100% compliance.

3. Deficiencies in social facilities, e.g. spaces in schools;

While new school is provided, other social facilities are not. The LBTH Infrastructure Development Plan 2017 in the evidence base of the new Local Plan says on page 85 for each 1,000 people there should be 1.2 hectares of open space

Therefore 1,524 apartments = 3,000 people = 3.6 hectares of open space versus only 1.96 provided

GLA make clear that the OAPF and the accompanying Development Infrastructure Funding Study - that all three growth options were based on original 722 home scheme. That a larger scheme is NOT required to deliver the additional homes forecast or required. That if approved the Development Infrastructure Funding Study needs to be recalculated, which will drive demand for all types of infrastructure listed in OAPF.

The Council report says, *"Any proposed increase in residential density on this site should be supported by an assessment of its cumulative impact on social infrastructure, utilities and transport infrastructure to ensure that the intensification would represent sustainable development."*

No analysis of cumulative impact as required in the new Isle of Dogs Neighbourhood Plan which was in Regulation 14 consultation between April and May 2019.

Health centre at 305 m2 is too small for NHS GP surgery use as they prefer larger facilities circa 1,000 m2 as more efficient to run.

4.Highway issues: traffic generation, vehicular access, highway safety – although number of parking spaces unchanged and more money for bus and DLR this does not solve other traffic issues especially those related to deliveries i.e. Ocado, Amazon.

Two schools on western entrance to development even if they open & close at different times will conflict with traffic entering the site.

PTAL even if 3 is still not a fantastic level of access.

Despite my requests in 2016 no consideration has been given to opening a new bus route through the site and then up Millharbour to reduce pressure on the DLR.

5.Capacity of physical infrastructure, e.g. in the public drainage or water systems:

Fresh water issues. Thames Water email of the 4th January 2019 which says

" Thames Water have identified that some capacity exists within the water network to serve 100 dwellings but beyond that upgrades to the water network will be required. Works are on-going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. There shall be no occupation beyond the 100 dwelling until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows from the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied."

Water pressure is a recurring issue and there are houses nearby where if one household has a shower adjoining houses have to stop their washing machines as not enough water pressure. Thames Water

only implemented a district water meter in May 2019 to measure water pressure on the Isle of Dogs at Westferry Circus.

Also, road transport network with only 2 entrances to Isle of Dogs, Westferry Circus & the blue bridge cannot sustain this level of population.

6. Local financial considerations offered as a contribution or grant;

The Tower Hamlets Community Infrastructure Levy for this site is currently set at zero.

On the 11th January 2018 well before this application was submitted Tower Hamlets Council started consulting on a revised scheme which would have made this site liable to pay £280 per square meter. The consultation process for that change was complete January 2019 (a later consultation on a boundary line did not affect this site).

While not yet final that the site has been viability tested to pay £280 per sq. m should be considered in any discussion related to viability or tenure mix.

In addition, both the new Local Plan and the OAPF development Infrastructure Funding Study show substantial infrastructure funding deficits across Tower Hamlets as well as locally. There is not enough money to pay for all of the new infrastructure required let alone one which exceeds that planned in the OAPF. Evidence of this can be provided if requested.

Summary

At stake here is the long-term future of the Isle of Dogs and whether or not it becomes like Manhattan and Hong Kong island. The Isle of Dogs is becoming super dense and super tall surrounded by relatively low density (except at Greenwich Peninsula) as is clearly shown in various 3D models like the NLA model at Store street or the NLA annual Tall Building Survey.

The question is whether this continues or not and if this application is approved it clearly indicates to other developers that the step-down principle which has been policy for almost 20 years now is dead. That will drive further tall developments locally as it will indicate that the planning process cannot be used to control heights.

I would recommend that if the Examiner does reject this application that if he does wish to provide extra guidance that it is to:

1. Implement the 2017 application or
2. That if the developer does wish to resubmit that they:
 - a. Changes axis of development to diagonal across the site rather than along water's edge so as to not conflict with sailing centre
 - b. Heights are reduced

c. Largest possible park to be introduced

This 3D model picture from Canary Wharf Group in 2017 gives some idea of the scale of development locally and heights, it shows the original 2016 Printworks application. They have other views like this which the examiner may find useful.

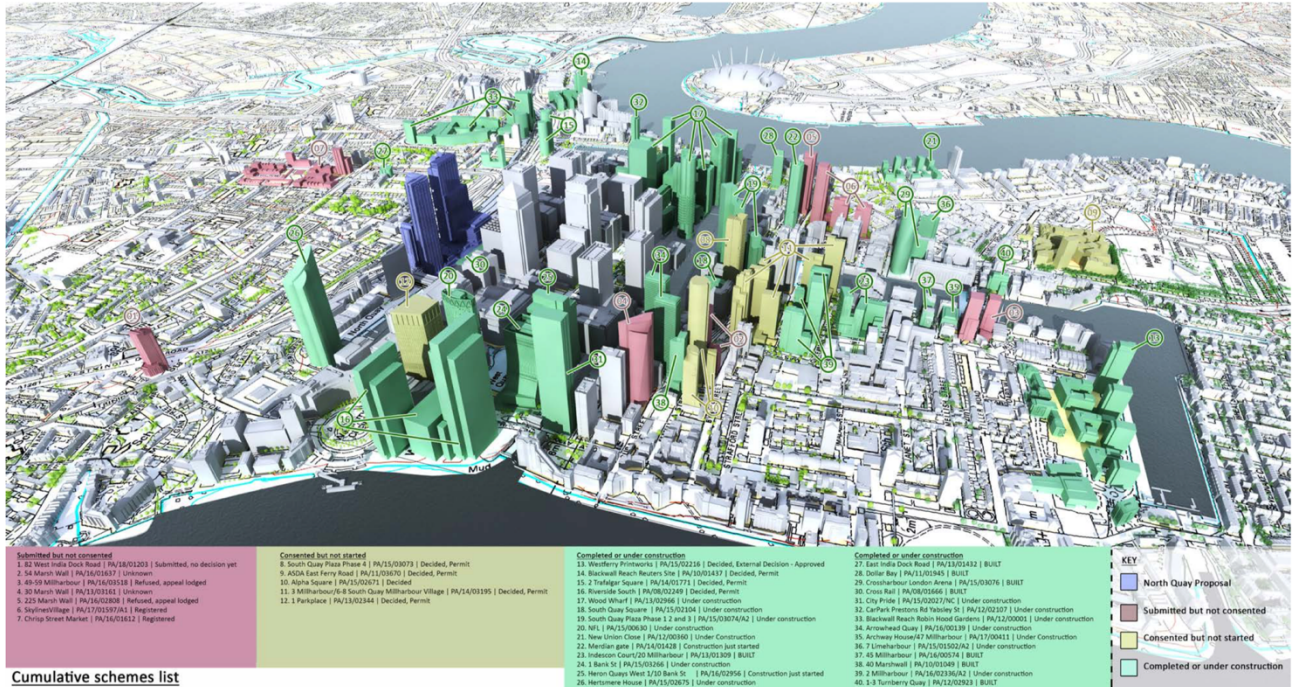


Figure 1b. Diagrammatic views of the Canary Wharf cluster showing proposed scheme for North Quay Site

Suggested Site Visit locations

I would suggest that any site visit includes the following:

I would strongly urge the examiner to view the 3D Vu-City model of the Isle of Dogs. It offers the best panoramic view of the wider area including approved but not yet complete planning applications so that the examiner can see this development in context. LBTH has access to the model and I am sure Vucity can provide a demonstration at their London office. If not a visit to the NLA physical model of London at Store street would offer similar benefits (except that not all approved developments are on the model).

Physical site visit

- Bokan restaurant on the 38th floor Novotel Hotel, 40 Marsh Wall, Isle of Dogs, London E14 9TP for a panoramic view. From the restaurant/café you have the best view of the wider area & specifically the site (may need to visit 37th & 39th floor as well for 360-degree panoramic views as different floors have different views)
- Millharbour road from north to south
- Greenwich View

- Tiller road from east to west to see gaps where connections will be made into site
- Westferry road by Arnhem Wharf primary school ideally at 3.30pm when children leave school or 8.30am when children arrive – we have a major problem with the use of cars to drop off or pick up pupils at this school
- River walkway – north as well as south side of dock
- Chapel House street conservation area
- Docklands Sailing & Water sports centre – need to talk to sailors
- General Wolfe statue in Greenwich Park