

Strategic Planning - Plan Making Team

Directorate of Development & Renewal

Tower Hamlets Council

Ref: Residents' response to South Quay Masterplan

16th February 2015

Dear LDF,

First of all, thank you for the public consultations you have held on the draft South Quay Masterplan (SQMP). We wish we had had more time to respond to such an important document.

We write as the Committee of the Isle of Dogs Neighbourhood Planning Forum. While the forum itself is still in the process of consulting and establishing its mandate, the following comments represent the overwhelming feeling from well-attended public meetings of, and other consultations with, Isle of Dogs residents. We have shared a first draft of this document via Email, Facebook and Streetlife.com in order to gather people's views & comments and have also held a follow on public meeting in Alpha Grove Community Centre last Monday night to discuss the content.

We would like to state at the beginning of this letter that we are not objecting to new buildings. The area has a number of derelict sites and London needs to build more housing – especially affordable housing. What is at issue are the types and scale of development allowed in any given area; the public infrastructure to support that development; and providing reassurance to existing, as well as future, residents that the quality of life in the area will increase and not decrease as many of us fear. The fact that, as this draft response has been composed, that Westferry & Manchester Roads have been shut for six days because of seven breaks in the water mains, is a perfect illustration of residents' concerns about development racing ahead of the public infrastructure's ability to cope. Approximately 25,000+ people have been without access to bus services for those six days.

Although we recognize the need to agree a Masterplan before more large developments are approved in this area, it's alarming that it is being written before the Opportunity Area Planning Framework has been undertaken. The two processes must surely be synchronized. What happens if the Council's Strategic Development Committee, conforming to the Masterplan, grants consent to

developments that are later found incapable of being supported by the local power, water or transport infrastructure? Do we just shrug our shoulders and hope for the best?

In considering our response, it is clear that most of our issues revolve the around the issue of density. Whether we are talking about transport, parking, water pressure, schools, nurseries, green spaces etc., they all link back to the level of density allowed. The higher the density of new developments, the greater the negative impact, as the LUC scoping document so clearly shows in its analysis of the options available.

Our main concern is that, in the Q&A session on Thursday night 5th February THC planners seemed to indicate that density was just one of a range of issues that needed to be considered and appeared to refuse to accept that your own consultants' maximum density recommendations should be included in the Masterplan. We were however confused by this public statement. The LUC scoping report you commissioned clearly lists eighteen separate criteria on which to judge development, including the need for new housing (Pt 14), climate change (Pt 18), maximizing the health of residents (Pt 13) etc. Those 18 criteria seem to plainly represent a balanced view on development. If not why was the LUC report not amended earlier (during its own consultation period last year for example) to reflect a more balanced view?

Two Mayors of London have now issued advice on density, reiterating a recommended density of 650 to 1,100 habitable rooms per hectare in an area with good transport connections (which does not apply equally to the whole of the SQMP area). Although individual developments may be allowed to exceed those recommended limits the wording of the policy statements do not seem to support a situation where every large building approved in a neighbourhood exceeds the recommended density levels – for example;

City Pride 5,803 hr/ha

Arrowhead Quay 3,357 hr/ha

South Quay Plaza 2,267 hr/ha

Meridian Gate 2,850 hr/ha

Pan Peninsula 3,300 (estimate) hr/ha

It has in any event been made quite clear that any developments exceeding the maximum recommended density must not only be exceptional in design: they

must be exceptional full stop. The GLA Housing SPG expressly states in relation to proposals for developments above the London Plan density ranges, as follows:

“Such proposals must also be assessed in terms of their bearing on the capacity of existing local amenities, infrastructure and services to support the development. As the Outer London Commission notes, “exceptions to the (density) ranges should be just that, whether above or below the appropriate range, and must be justified robustly”.”

So our main concern is that you are not putting enough weight in the Masterplan on the importance of the guidance issued by LUC, the GLA and two London Mayors.

A perfect illustration of our concerns is “Table 1: indication of infrastructure requirements in relation to London Plan density matrix range for a ‘Central Location’” on Page 47 of the main report. While it considers infrastructure based on densities of between 650 and 1,100 habitable rooms per hectare, but all of the developments listed above substantially exceed those recommended limits, as do others already in the planning approval process. So unless you are planning for all residential development to cease completely when the average for the neighbourhood hits 1,100 hr/ha leaving swathes of undevelopable land, what is the solution? If not, why does Table 1 not include options for higher levels of density? The only sensible answer is of course to limit density as we go, and the Masterplan must surely be the place to do it.

This also reflects a concern that the Masterplan does not take account of all the developments already approved in the area, those in pre-planning and those we expect to be approved before the Masterplan is complete. For example, the maps and diagrams provided do not show the impact of South Quay Plaza on the proposed pocket park in the area. Residents who were involved in the Millennium Quarter Masterplan consultation in the year 2000 have been trying to remember whether it became defunct the same year, or four years later when Pan Peninsula and Landmark were approved. We are concerned that the South Quay Masterplan will also be defunct before its approval process is even complete.

While we acknowledge the good faith and expertise of the officers and their expert advisers charged with drafting the Masterplan, we also worry about a lack of local knowledge, for example, the following comment on p32:

““The space underneath the DLR offers an opportunity to create a vibrant stretch of innovative linear open spaces within South Quay and across the DLR network in a similar fashion to New York’s High Line.”

Underneath the DLR line is a very noisy location that literally vibrates when trains pass overhead, is permanently in shadow, is splattered from drains carrying overflowing water from the overhead structure, and is located next to a busy road. New York's High Line by contrast is a quiet, elevated space, away from the noise pollution of an active train line and road. Residents know which space they would rather have. The space beneath the DLR could certainly be made prettier, but it's no recreational location.

Development has to work for both existing and future residents as per the National Planning Policy Framework, but a number of residents have already indicated their intentions to leave the area concerned about another fifteen years of construction disruption and infrastructure access issues. Sustainable development is meant to protect the rights of current and future residents not drive current residents out of the area. That cannot be good for community cohesion, and it certainly isn't logical.

Our firm wish is that the investment, goodwill and effort that has gone into drafting the Masterplan leaves us with a policy statement that both makes sense and has some effect. Please therefore include a robust policy statement limiting density to the level recommended by the London Plan. Then let's work together to develop our area intelligently.

Yours faithfully,

On Behalf of the Committee of the Isle of Dogs Neighbourhood Planning Forum,
speaking up for all Isle of Dogs residents and local businesses