

Comments on the Canada Water Masterplan Application 18/AP/1604

Commenter type: Neighbour Consultee

Stance: Object

Comments:

Background

I live in [REDACTED] one of the properties that shares a boundary with the Canada Water Masterplan site on its western edge. I also work in Southwark at London Bridge and experience the rush hour daily on my journey to my office. I have been involved with engaging local residents in the proposals for our community for the last 4 years [REDACTED] Canada Water West Residents Action Group. Our group collected 360 signatures for a petition calling for a rethink on certain aspects of the Masterplan which was presented to the Bermondsey and Rotherhithe Community Council on 26th June this year. Details can be found here: <https://canadawaterwest.org/>

I write this response to the planning application 18/AP/1604 [REDACTED]

General comments

I am in favour of the principle of regeneration in the Canada Water Area. However, I believe there are multiple ways in which this plan misses a once in a generation opportunity to regenerate (rather than develop) Canada Water and make a huge contribution to providing affordable homes. It fails to address critical existing issues such as transport and lack of infrastructure. In some places it is in contravention of the planning frameworks and I therefore contend that it should not be recommended for approval without major revisions.

Approach to existing residents and character of the area

Far too little regard has been paid to existing residents. On a site of 45-acres it would have been possible to prepare a scheme that respected the fact that this is not a totally blank canvas. Instead, the proposal sees buildings placed right up against existing homes with impact which will affect the health and wellbeing of my family and my neighbours due to loss of light and privacy.

Throughout the application reference is made to the 'emerging character' of the area in order to justify amongst other things, the density of the area and the loss of daylight¹ to existing properties. Those of us who already live here enjoy a relatively low-rise, suburban, green environment with plentiful historic links. This plan seeks to totally change this character to the detriment of existing residents without providing the necessary social infrastructure to support the new residents and workers. In other words, residents like me will lose our existing quality of life because of the density of new buildings AND we will find life more difficult in future because of the pressure on social infrastructure and transport.

Tall buildings

The positioning and height of the tall buildings proposed are in contravention of the CWAAP.

¹ 7.6.58 "When evaluating the effects of the Development on daylight/sunlight levels to neighbouring properties, it is important to note that the BRE guidance is predicated on a suburban environment and are therefore it is not appropriate to strictly apply these guidelines to a central London context."

Recommended building heights in the 2015 Canada Water Area Action Plan are of 22-25 stories. The plan as submitted contains seven towers which exceed this limit. Some of the proposed tall buildings including those within Plots B and C are located well outside the adopted tall buildings area of the CWAAP.

The plan talks about clustering of towers but the reality is that tall buildings are being put wherever they are allowed vis a vis the viewing corridor and they are so much taller than the existing towers of Ontario Point, Regina Point and Columbia Point that they will not provide a clustered effect with any existing towers. The experience on the ground will be towers acting more like sentries at the corners of the scheme blocking off the main central Masterplan area from the surrounding community.

The CWAAP of 2015 states at 4.5.12f "It is also important that proposals do not create a canyon effect on either side of the protected viewing corridor." I agree with Historic England's view in their letter to you of 18th July 2018 that the positioning of so many tall buildings immediately on the edge of the viewing corridor will create a "canyon effect" on the views between St Paul's and Greenwich.

Masterplan Design Guidelines on page 81 cite the opportunity for tall towers in Zones F and G because of their 'distance from lower neighbours'. Why is this logic not being applied to the tower at A1 or the towers in plots C and B? If there was any concern for lower neighbours then there would be no tall towers in these three locations where the impact of loss of daylight and skyline is severe.

Loss of Daylight and Overshadowing

The plan to build a tall tower on plot B will result in a breach of the BRE Guidelines to the back windows of my property. I am dismayed by the lack of consultation on this aspect of the Masterplan. We requested light and wind studies at the January 2018 consultation but were subsequently told to wait for the planning application. Having done so, I received totally contradictory information from two different individuals from the lighting consultants at the June 2018 consultation events. We have not been visited by the lighting consultant so my understanding is that the impact stated in the plan is at best a guess on their part. It appears that only a fraction of affected properties have been studied in detail.

Given that the tower at plot B is outside the CWAAP adopted zone for high buildings and given the detrimental affect it will have on the skyline and historic views, I believe this part of the plan should be completely recast to give a building more in keeping with the suburban landscape which surrounds it and with a maximum of six storeys.

Transport

The transport provision in this area is already unsustainable with overcrowding leading to the frequent shutting of Canada Water underground station, buses arriving completely full at the station with workers from areas to the south coming to join the underground network and gridlock around the Rotherhithe Roundabout and Lower Road occurring every day, even at the weekend.

In order for the Masterplan to qualify as a sustainable development, therefore, it would need to present a comprehensive and impactful transport strategy. The plan is manifestly lacking in remedies either to the existing transport problems or the additional burden placed upon the network by its proposals.

The figures used to model transport are seven years old. The application does not take into account the impact of the quantum of development in the surrounding area. The huge projects at Convoys

Wharf to the south in Deptford and the Grosvenor plans for the Biscuit Factory in Bermondsey will add significant demand to the Overground, tube and bus network.

The lack of a comprehensive transport strategy that has been worked out with the relevant stakeholders leads the applicant to admit that existing residents will need to choose 'alternative routes'.²

This is an admission of the unsustainable nature of the development i.e. existing residents who currently join public transport at Canada Water or Surrey Quays will find it so hard to do so that they will give up trying. What are the 'alternative routes'? Anyone like me who has experienced the frequent shutting of Canada Water underground station due to overcrowding will know, alternative routes via bus quickly become unviable and have a knock-on impact on people further away from the site. Passengers who want to get on buses at any of the stops between Southwark Park and London Bridge along Jamaica Road (route 47) or to Druid St (188) are unable to get on a bus at all. This is the situation now, before the development.

The application, however, claims the impact on the local bus network as 'relatively minor'³

While I appreciate that transport policy has to be formulated with TfL and the local Council, at local meetings the developer has many times alluded to ongoing discussions about possible transport remedies (such as finding funds to rebuild both Canada Water and Surrey Quays stations) which should have been brought forward in advance of or at the same time as planning permission for a scheme of this magnitude is sought.

It is also premature to lodge this application before the consultation on the Lower Road 1-way system/CS4 has taken place.

As an asthma sufferer who lives in sight of the congestion on Lower Road which is a daily occurrence (including at weekends), my health and that of my son will be further harmed if a strategy is not brought forward to improve the flow of vehicles and prevent any further congestion as a result of the development. An unsustainable development at Canada Water will put paid to any attempts by Southwark Council to prevent breaches of air quality standards.

Infrastructure

The plan is failing to deliver regeneration because most of the facilities it references are replacing existing facilities and there is little that is new. There are several mentions (e.g. at 3.3.16 in the Planning statement) that the Leisure Centre is 'new' when it is actually replacing an existing leisure facility at Seven Islands. In fact, there appear to be fewer leisure amenities planned than there are currently. Only the cinema has protected status and other facilities such as the bingo and bowling seem to be going.

² *Planning Statement 7.5.34 "However, the result of this increased inbound movement is that passengers who were previously using Canada Water or Surrey Quays **choose to seek alternative routes**" [my emphasis]*

³ *Planning statement 7.5.41 The Transport Assessment has analysed the likely impact of the Development on the local bus network. The increases in demand associated with Scenario 1A (maximum residential scenario) are relatively minor, with the majority of additional bus trips taking place along the A200 corridor from Bermondsey / London Bridge to the west and Deptford / Greenwich to the east.*

There is no increase in usable green open space for sport. We need more free-to-use tennis courts and other sports pitches if we are to avoid overburdening the facilities at Southwark Park and ensure that the community can lead healthy lives. The existing provision of 4 courts in Southwark Park is already oversubscribed with waits of over an hour for a free court and regular altercations breaking out between people frustrated at the wait.

Currently, the area suffers from poor broadband connectivity and on the western edge, weak mobile phone and satellite signals. I am concerned that this lack of essential telecommunications infrastructure will be negatively affected by the development.

The lack of commitment to a new health centre will put a strain on existing facilities. It can take up to 3 weeks to get a routine appointment at the doctors' surgery in Albion St.

Site A1

The CWAAP states at 4.5.12g: Proposals for tall buildings should take into account the desirability of sustaining and enhancing the significance of heritage assets and their settings, in accordance with the NPPF.

The tower proposed at A1 has a negative effect on the Dock Office Listed building. The planning statement's contentions at 7.4.76 that "Plot A1 will enhance the setting of the former Dock Offices" and that they will be "clearly distinguished" are utterly specious.

The Dock Office is completely obscured by the massing of the base of the A1 site. It will no longer be visible from the Canada Dock with which it has a historic link. It will also be blighted by having a new service road immediately in front of it where lorries will have to wait in order to get into the traffic on the major bus route that is Surrey Quays Road.

The application claims 'mediation between the scales' of the tower, its base and surrounding building. In fact, the height and massing of the base is out of all proportion with the historic building of the Dock Office and its immediate neighbour Orchard House (also an historic building).

At this height, the tower at A1 has to be of significant architectural merit. There is nothing striking here in architectural terms, indeed, there is a recently-built block in Nine Elms which is more than a little reminiscent of this proposal – see photograph at the end of my comments.

The application is failing to promote social cohesion in the detailed plans put forward for A1 and K1 because A1 is a luxury high-rise development which fails to provide a desirable mix of tenures (with only 8 affordable housing units). Instead socially rented housing is all pushed onto K1 which is further away from transport, shops and other amenities and where apartment sizes are much smaller. Moreover, the larger 3-bedroom apartments in A1 which would encourage families with older children or larger families to buy in the area and ensure people of all ages are present in the community are in located on the top floors and are therefore penthouse suites which will be unaffordable to anyone but the extremely wealthy.

Site A2

Location of replacement leisure centre

The applicant has wrongly stated that the site of the proposed Leisure Centre was the community's preferred option. In fact, in 2016, under information obtained from a Freedom of Information request, we discovered that more people were in favour of rebuilding a new leisure centre on the existing Seven Islands site, than on any other site. Furthermore, 75% said they were happy with this even if it meant there would be a break in provision for 3-4 years.

Leisure facilities

I am not satisfied that the leisure facilities proposed will be adequate for the growing population. Sellars are intensifying development on their site adjacent to the Masterplan area and this application is seeking a density much higher than earlier versions that were consulted on. The brief for leisure facilities by contrast does not seem to have changed in the last 4 years of consultation. The pool at A2 is barely bigger than the existing pool by volume and it cannot therefore be big enough to support the increased demands of a much bigger community. The pool currently at Seven Islands also has a depth that would allow for scuba diving and high board diving which will never be possible in the new pool.

Lack of architectural merit

The applicant makes much of its attempt to reference historical use of the site with a 'modern warehouse' design but this is not in keeping with current buildings which are residential. The design of the building is incoherent with different treatments for each of its five facades.

Impact on local area

There has been no attempt to relate the building at A2 to its setting. The A2 block is built right up against the homes on the north side of Hothfield Place at a totally different scale to them. It will have a hugely negative affect on the privacy and light of these homes and it will create a claustrophobic effect on all residents on the street. All of these factors will be detrimental to residents' wellbeing.

In order to prevent office workers overlooking residential properties, the building relies on planting that has to provide an effective screen and be constantly maintained. This is risky. A leaseholder looking to save money, a poor choice of plants, a very hot summer or a cold winter could all remove this vital screen. Privacy should be properly designed into the building from the start.

The loading bay for this building has been placed where it will have most impact on existing residents. The projections are for 66 deliveries a day which all have to reverse to access the bay which will mean constant reversing beeps. The peak time is stated as being between 07.00-08.00. There must be a commitment to reduce this frequency and the plan should be redrawn to avoid vehicles having to reverse for access.

Access and wildlife

There is no vision for access from Hothfield Place on to the Masterplan site. The New Southwark Plan site vision diagram clearly shows the opportunity for improved connectivity for pedestrians and cyclists at this point but the applicant has chosen to apply for permission to build without showing what this will look like. There should be vision for this part of the Masterplan as there is for the other western pedestrian route to the north of the A2 plot.

My belief is that the building at A2 will limit what is possible in terms of access and it should therefore be planned at this point and not left to the whims of the developer for consideration in the future.

This comment also applies to the wildlife area to the west of the Hothfield Place ramp. I have been in discussions with British Land about its future and have a verbal commitment that it will be retained and enhanced as a wildlife area. Again I believe this should be a formal part of the plan at this stage. The plan only refers to this area being retained and not developed but there is nothing here about actively managing it as a woodland. This is a critical ecological resource which supports a wide variety of birdlife, foxes, squirrels, moths and insects. Given that trees all over the site will

have to be cut down before new ones are planted, the opportunity to retain biodiversity and conserve nature must be taken. If it is not, the plan is not living up to its stated aim of “*providing a network of green spaces to promote habitat connectivity and interaction with wildlife.*”

Development Zone B

As a direct neighbour to this site, I welcome the proposal to layer these buildings to reduce their impact on residents and to produce a more aesthetically pleasing gradation of heights from the existing houses to higher rise behind them, especially as seen from Southwark Park. However, there should be a firm commitment at this stage to reduce any overlooking. There should be no balconies or outside access to the terraces created to reduce the impact on local residents. I would also suggest green walls to blend these buildings into the woodland that is to be retained.

Site M (Rotherhithe Police station site)

The building which replaces the Police Station should be no taller than the current building. The outline plan of the new building shows a massing in excess of existing buildings and does not reflect the local footprint or the topology of period residential properties, especially those in Gomm Road. No matter what is built on the rest of the Masterplan site, the character of Lower Road at this juncture will remain small scale and residential and the building at Site M must respect this.



Figure 1 A recently-built residential block in Nine Elms, London which shows a great similarity to the proposed A1 building which cannot therefore claim any architectural merit.