

To: The Planning Authorities, Southwark Council

PETITION from a group of local residents

The Canada Water Master Plan and the Canada Water Area Action Plan

This petition asks the Southwark Planning Authorities to respond to serious concerns about the conduct of its planning procedures and the interpretation of its agreed planning principles. New waterfront plans are directly contradictory to many of the policies set out in the Area Action Plan. Public consultation on certain of these waterfront plans is being handled inadequately, with excessive haste, and by key consultation processes being passed on to an external developer. The views expressed here follow a series of local meetings and widespread discussions with residents. These comments run parallel with the concerns and suggestions made by the Save South Dock Boatyard Campaign Group (with whom exchanges have been maintained) but their concerns are focussed on the dockyard. We support their concerns, but wish in this memorandum to open *additional* wider policy matters to public scrutiny. This paper is in two parts. *Executive Summary* and more detailed *Questions*.

EXECUTIVE SUMMARY

- 1. Earlier public planning meetings have been inadequately pursued.**
- 2. The St George's Wharf plan contradicts many of the policies in the Canada Water Area Action Plan of Nov 2015.**
- 3. The erection of large and high blocks of flats monopolizing the river view runs counter to Policies 1 (green space heritage), 4 (river accessibility, heritage assets), 5 (environment protection from development), 13 (public openness), 14 (docks legacy), and especially H2 (to focus high density housing in the urban core designated for that purpose at Canada Water).**
- 4. The question of heritage assets spills over to properties nearby in Lewisham. How are the St George's Wharf development and other plans closely coordinated in wider policy terms with Lewisham authorities so as to protect threatened aspects of environment and heritage? The river as heritage is a very precious and rare asset.**
- 5. In addition how are the developments at Lewisham's (e.g.) Timberyard, Convoy's Wharf, Greenland Place, Marine Wharf; and Southwark's (e.g.) Tavern Quay, Quebec Quarter, factored in to the wider planning of societal support structures in education, healthcare, policing and security, public transport, welfare, access to waterfront greenspace, and historical protection?**
- 6. To what extent has the St George's Wharf plan been animated by the policy principles in 4.4.16, and 7.4.28 to seek revenues? And what counter-principles came into play during policy-making, given recent publicity criticizing Southwark Council for financial pragmatism?**
- 7. Does the predictable social make-up of the likely occupants of St. George's Wharf (after the churn from selling council-allocated flats) fit with Southwark Council housing policy?**
- 8. Has adequate account been taken of the report by Transparency International (March 2017), based on studies of development outcomes, recommending the clustering of high density/tall buildings near to multi-modal transport hubs?**

QUESTIONS

The issues here are presented in two parts: (A) a summary of relevant policy statements taken from the Area Action Plan, (B) challenges that emerge from the contradictions between policy and planned implementation

Appendix Part A

A summary of key policy statements from the Canada Water Master Plan. (Points of reference are taken from the plan itself).

RIVER

Policy 1. the areas green spaces and heritage should be enhanced, especially the River Thames, the docks and the parks to create a distinctive sense of place

Policy 4. To make the River Thames and its river front more accessible

Policy 5. To reduce the impact of development on the environment

H2. To focus higher densities (for housing) in the action area core where there are town centre activities and good access to public transport

Policy 13. Arts, culture, tourism. Supporting the use of docks for water-related leisure and tourism activities which do not affect their openness, and making improvements to the public realm around the docks

4.4.11. There are a number of heritage assets and their settings which are significant to the local history of the docks and riverfront and which contribute to defining the character of the Rotherhithe area. Need to conserve or enhance these.

4.5.P1. There should be no gated communities and the area's green spaces and heritage should be enhanced, especially the River Thames, the docks and the parks to create a distinctive sense of place

4.5. P4. To make the River Thames and its river front more accessible.

4.5.P5. Aim to reduce the impact of development on the environment.

Policy 14. Recognize the physical legacy of the docks as a key part of the character of the area.

NEW TOWN CENTRE

Policy 15. Building blocks in the core area should have a strong vertical emphasis.....'Prominent corners in the new town centre' can be marked with buildings but these need not be tall buildings over 30 m high, to add a sense of place.

Buildings in the core area, which are significantly higher than 25 storeys, must demonstrate that they contribute positively to London's skyline when viewed locally and in more distant views.

Policy 17: Building heights in the core area.

Prevailing building heights in the core area should be between 4 and 8 storeys...and generally at the lower end of the range on sites on the periphery of the core area.

4.5.14. The AAP vision

Tall buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre.... and help to define the importance of the Canada Water basin....as the focal point.

Within the area indicated on Fig 9 tall buildings which have around 20-25 storeys will be appropriate.

Tall building in the core will need to demonstrate a considered relationship with other tall buildings and building heights in the immediate context in views, including views along the River Thames....The massing of tall buildings (in the core) should be articulated to ensure that cumulatively, tall buildings remain distinguishable as individual elements on the skyline.

Map supplied: London View Management Framework Strategic Views. This contains an 'indicated' area where tall buildings which have around 20-25 stories will be appropriate. This area goes no further than 300 m. from Canada Water in any direction. No other areas are identified as suitable for tall buildings within this AAP vision.

ST. GEORGE'S WHARF

4.4.16. St George's Wharf opportunity to provide facilities for both local people and visitors...and much needed funding.....

7.4.28. St George's Wharf is a working boatyard....could provide funding... We also note a new community centre plan, for nearby.

7.4.29. Boatyards are protected in the London Plan and any development on the site should not compromise the operation of the boatyard.

7.4.30 New facilities at St George's would need to be planned carefully to ensure that they are not too noisy or disruptive for local residents.

Appendix Part B.

Questions to the Southwark and London Planning authorities.

(note; references in this part of the text are to the policy sources listed above)

1. Why has there been no follow-up to the public hearings about St George's Wharf on 19 Sept 2016, at which many questions were raised and responses promised via a comprehensive document in a few weeks? All attendees left email addresses.
2. Why is the St George's plan, as so far discerned, so contradictory in so many ways to the Canada Water Area Action Plan? Specifically an account needs to be offered to the public as to why the following changes of policy have been adopted:
 - (a) Policy 1. The policy to enhance the green and heritage areas along the riverside, to create a distinct sense of space, more open, with the environment less threatened by development, cannot possibly be served by the erection of huge blocks of flats monopolizing the river view, and built 'to provide much-needed funding' (4.4.16).
 - (b) How does this development make the river front more accessible? (Policy 4) (4.5 Policy 1, Policy 4, Policy 5, Policy 14)
 - (c) How does it reduce the impact of development on the riverside environment? (Policy 5)
 - (d) If the policy is to focus high density housing in the new town centre core, where it can benefit from the central facilities (H2), how can that be reconciled with a massive equally dense agglomeration so far from the core at St George's?
 - (e) How is the St George's proposal to be reconciled with Policy 13, which stresses the importance of openness in the water-based public realm?
 - (f) In 4.4.11. stress is placed on heritage assets. Close to St George's are very rare heritage assets in the form of historic buildings. What coordination has taken place with the Lewisham authorities to protect the surroundings and approaches to those assets?
 - (g) In the plans for the new town centre, (4.5.14, The AAP Vision) the prevailing building height is envisaged as between 4 and 8 storeys, descending lower to the edges of the core and ending with four symbolic corner buildings of no more than 30m. high. (Policies 15 and 17). That same core will have a cluster of tall buildings, 20-30 storeys, but these would be built under strict restrictions, namely: defining the importance of Canada Water as a focal point; demonstrating a considered relationship with other buildings; contributing positively to London's skyline as a cluster. All such buildings are to be constructed around Canada Water within a radius of about 300m. Why is there nowhere in that plan any discussion of an outlier development of seemingly great height (St

George's), but not accounted for in the overall vision as it was conceived?

- (h) Given the discrepancy between the logical principal of concentrating density in the new town centre, and then later adding a large new centre too far away to benefit conveniently from the central facilities, the question arises : What were the real planning considerations behind St George's and have they been placed fully before the public? Has it been driven by the revenues referred to in 4.4.16 and 7.4.28?**
- (i) What account has been taken in planning, of the seeming inevitability of newly built flats in a waterfront building being quite rapidly re-cycled into new ownership by categories of people not intended in the plan? And what are the long-term implications of this for public duty if it entails loss of access to riverside facilities for local people?**
- (j) Why has the question of further public consultations on St George's been taken out of the normal (and so far very incomplete) process, and moved with inadequate notice into the domain of a potential developer? This question is asked because by dividing up the public attention so that it is required to focus on St George's only, (given that the developer only has that remit), the wider implications of St George's for the earlier agreed overall Canada Water Plan may not then be forced back onto the Council agenda. If those implications are to be so forced, it would appear much more cost-effective to do that prior to wasting the time of a developer and the money of the Council.**
- (k) As an illustration of this last point, concern is regularly expressed about the almost complete absence of answers to questions about the pressure on public facilities from proposed large-scale new building. Were large developments such as St George's to proceed, and given the little-discussed additional development plans for e.g. Timberyard and Convoy's Wharf , as well as the currently completing constructions at Tavern Quay, Quebec Quarter, Greenland Place, and Marine Wharf, what will be done over parking, local transport, security, schooling, medical care, welfare provision? These are not developer responsibilities. They are public issues and they entail the coordinating, clarifying and announcing of policy.**