

28th April 2017



Isle of Dogs Neighbourhood Planning Forum
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Dear Sir/Madam,

**REPRESENTATIONS IN RESPECT OF THE PROPOSED ISLE OF DOGS
NEIGHBOURHOOD PLAN REGULATION 14 CONSULTATION**

SUBMITTED ON BEHALF OF HONDO ENTERPRISES

This written representation is made by DP9 Limited, on behalf of Hondo Enterprises, regarding the Isle of Dogs Neighbourhood Planning Forum Regulation 14 Consultation of the Draft Neighbourhood Plan.

Hondo Enterprises are the owners of the City Harbour NCP Car Park, Selsdon Way, E14 9GL and therefore have an interest in the development of the Local area. Our client is therefore well placed to comment on the proposed Draft Isle of Dogs Neighbourhood Plan.

It is noted that the proposal is for the adoption of a 'short' Neighbourhood Plan in advance of the adoption of a 'long' Neighbourhood Plan. This approach is not considered to offer a thorough consideration of the issues relevant to the neighbouring area. In order for the Neighbourhood Plan to be effective, the key priorities and the clear design objectives should be set out within a comprehensive plan. It is also relevant to note that the London Plan is soon to undergo a full review which will be a significant relevant consideration in the production of the Neighbourhood Plan, particularly given the reliance on the current London Plan. It is therefore considered arbitrary to produce a 'quick' Neighbourhood Plan at this stage.

D1 - Density and Infrastructure

Our client acknowledges the need for the relevant infrastructure associated with development to sustain the local population. However, the principle of payment of CIL and other relevant financial contributions by developers is for the relevant infrastructure to be provided in the most appropriate location and in order to pool funds towards infrastructure where the cost arising from the development would not account for full provision of a new service. It is not always appropriate to provide infrastructure on site due to site specific characteristics. The draft Policy should not be worded to require applicants to demonstrate where the funding will be spent as the funding is provided to the Council for their allocation.



D2 – GLA’s London Housing SPG

The duplication of the London Housing SPG policies into the Neighborhood Plan are not required as the SPG supports the Development Plan which forms a material consideration in the determination of planning applications. Our client supports the aspirations of the policy which promotes the intensification and provision of higher density development on the Isle of Dogs in appropriate locations, and is pleased that the density ranges outlined within Table 3.2 of the London Plan will not be applied mechanically by the Neighbourhood Forum in assessing developments which exceed the density matrix, “*providing important qualitative concerns are suitably addressed....[including] high quality design...local context and character...and public transport capacity*” (see paragraph 1.3.51).

The policy also notes that the ‘long’ plan will include clear design expectations. It is considered that this should be expanded upon as part of a comprehensive Neighbourhood Plan.

GRI – Helping establish new residents’ associations

Our client supports the principle of the formation of new resident’s associations within new developments but considers it onerous to require a monetary contribution from landlords to fund this which would ultimately be passed on to the tenants/owners. It is not a planning matter to require the formation of resident’s associations.

3D1 – 3D Model for Planning & 3D2 – 3D Model for Applications

The proposed requirements to provide 3D modelling for development is overly onerous. The requirement to provide the wider impact of development within 500 meters beyond the boundary of the area is particularly onerous and arbitrary.

Planning Application requirements are set by the Local Authority through the validation checklist and as such the requirement to model proposals should be set at this level. Various methods are used to visualise proposed development, 3D modelling may not be appropriate or necessary for all developments particularly minor applications.

SD1 - Sustainable Design

We note that draft Policy SD1 requires all non-residential developments to meet a BREEAM rating of Excellent and for all major commercial refurbishments of existing buildings or conversions over 500sqm to achieve a BREEAM non-domestic rating of Excellent. The policy is a duplicate of the wording contained within Strategic Policy SG1 within LBTH’s draft Local Plan and is therefore unnecessary and should be removed from the emerging Neighbourhood Plan.



We hope you take these representations into account in the production of your Neighbourhood Plan. Should you have any queries or require any further information on the enclosed, please contact Tom Horne or Olivia Willsher of this office.

Yours faithfully,

DP9 Ltd

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