

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 NORTHERN AND SHELL

This written representation is made by DP9 Limited, on behalf of Northern & Shell Investments No. 2 Limited, regarding the Isle of Dogs Neighbourhood Planning Forum Regulation 14 Consultation of the Draft Neighbourhood Plan.

Northern & Shell Investments No. 2 Limited are freehold owners of the Westferry Printworks site on Westferry Road. The site is currently subject to Site Allocation 18 of the LBTH Managing Development Document which designates the site for *“a comprehensive mixed-use development required to provide a strategic housing development, a secondary school, publically accessible open space, an expanded leisure facility, a district heating facility (where possible) and other compatible uses.”*

Planning permission was granted on 4th August 2016 (LPA Ref: PA/15/02216) for demolition of the existing buildings and structures at the Westferry Printworks Site and the subsequent comprehensive mixed use redevelopment comprising a secondary school, 722 residential units, together with other retail, flexible office and community uses. Our client is currently discharging all pre-commencement obligations to redevelop the former Printworks and deliver the Council’s wider strategic planning objectives for the site.

Our client is therefore fully well placed to comment on the proposed Draft Isle of Dogs Neighbourhood Plan. It is in this context that we provide our representations.

Implications for Planning Policy

Density and Housing – Policy D2

Our client welcomes 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 mechanistically 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). However, the wording within Part 1 of Draft Policy D2 seems to be a repetition of both regional and adopted local plan policy guidance with minimal reference to further



site specific allocations on the Isle of Dogs (such as Westferry Printworks). We would therefore question whether there is a need for this policy within the Neighbourhood Plan.

Broadband Access and Choice– Policies BBA1 and BBA2

We recognize the importance for new development on the Isle of Dogs to have access to fibre optic cabling. However, the provision of fibre optic cable is a matter for statutory providers and is not a relevant material planning consideration in the determination of planning applications. Therefore draft Policies BBA1 and BBA2 which require the provision of fibre optic cable in new developments should be deleted.

Paragraph 158 of the NPPF states that each local planning authority should ensure that local plans are based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Furthermore, paragraph 162 of the NPPF requires local planning authorities to assess “*the quality and capacity of infrastructure for water supply, energy (including heat), telecommunications, and utilities and their ability to meet forecast demands.*” The draft policies appear to be underpinned by a limited evidence base with minimal justification for their inclusion or capacity requirement on the Isle of Dogs.

Sustainable Design – Policy SD1

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 look forward to receiving confirmation that these representations have been received. Should you have any queries or require any further information on the enclosed, please contact Jonathan Marginson or Chris Deeks of this office.

Yours faithfully,

P.P. 

Jonathan Marginson
Director
DP9 Limited

cc. Richard Martin, Northern & Shell Plc
Robert Sanderson, Express Newspapers