

The Planning Inspectorate  
Room3/0  
Temple Quay House  
2 The Square  
Bristol BS1 6PN



**THE HEART**  
of **WAPPING**

27/06/2017

Dear Leanne Palmer,

Please find attached the Turk's Head Charity's  
comments against appeal

**APP/E5900/W/17/3167832**

Regd Charity Number 1013903  
The Turk's Head Charity  
1 Green Bank  
London E1W 2PA  
0207 488 6801

[www.turksheadcharity.com](http://www.turksheadcharity.com)  
[turksheadcharity@gmail.com](mailto:turksheadcharity@gmail.com)

## **1. Impact on the local highway**

In the applicant's Transport Statement prepared by Aecom it cites planning policy. The National Planning Policy Framework 2012

Paragraph 35: "developments should be located and designed where practical to: "accommodate the efficient delivery of goods and supplies".

Local Policy:

The Tower Hamlets Local Plan consists of the Core Strategy Spatial Policy (SP) and Managing Development Document (MDD) and aims to guide and manage development in the borough.

Policy SP12 states that developments should have access to a range of public transport modes in order for local people to access other parts of the borough and the rest of London. Places will also require to be designed to support the day-to-day activities of local people and ensure they maintain a well-connected, safe, and attractive network of streets and spaces that make it easy and pleasant to walk and cycle.

Policy DM 20 states that:

"highway safety, community and security considerations associated with the development, including safe pick-up and drop-off zones and waiting areas; and servicing demand and respective servicing vehicle arrangement including loading bay provision where appropriate".

In light of this, the applicant's Transport Statement claims incorrectly that:

"the footways along Clegg Street are approximately **0.8m** (Site C) in width on the eastern side and 1.6m in width on the western side narrowing in areas due to off-street furniture.

The footway is **0.7m** for the length of the site. Even if this pavement is doubled in width, it will be still be narrow. The houses on Site C are family houses, where children will more or less walk straight into the road. This does not comply with the policies above on highway safety for vehicles or pedestrians.

### **Comments from LBTH on Transport Statement**

"SERVICING ARRANGEMENT: Clegg Street and Cinnamon Street are very narrow two way public highways. It is not possible to service any apartment from any of these roads without blocking the public highways. Transport and Highways do not support any proposal to block public highways to service an individual property. At pre-app stage Transport and Highways advised the applicant to provide servicing and delivery arrangement on-site. Transport and Highways cannot accept current proposal. This was our position on the previous application and the applicant has not addressed this issue in this application."

AECOM response May 2016:

“Although it is acknowledged that the carriageway width(s) of the surrounding highway network are constrained in places, vehicular deliveries/servicing currently takes place in the area of the current/former industrial uses at the site. This is therefore an existing situation, where for example, refuse vehicles (serving multiple units, rather than individual properties) currently travel along Clegg Street and Clave Street. Notwithstanding this, it is understood that the proposed servicing/refuse strategy was informed by discussions with LBTH officers.

“Swept paths were also undertaken as part of the TA to demonstrate the likely manoeuvres of servicing vehicles and how these could be achieved. The residential nature of the scheme is likely to reduce the level of larger LGV/HGV movements in comparison to the amount which would have been attracted by the former industrial uses. The majority of deliveries to the proposed residential dwellings are likely to be undertaken by small vehicles such as motorcycles, cars or transit vans. It is therefore not considered that the proposals will exacerbate the existing highway situation in terms of additional servicing/delivery activity. The proposals are also car-free which will minimise the level of vehicular activity associated with the site in general.”

LBTH response:

“The applicant has stated that they have discussed issues regarding servicing arrangement with a Highways officer. Can we have the name of the Officer and any email confirming what was agreed. We may accept refuse taking place as the vehicles are always manned and can be moved if emergency vehicles need to pass but not general servicing where vehicles may be parked and unmanned. Even if that is an existing situation, going back years to when these were warehouses and a lot less traffic, it doesn't mean it is an acceptable situation, or a safe one.”

In the applicant's Townscape Statement Part 1, supplied by Montagu Evans, in Chapter 3, it states that the warehouse on Site A was partially demolished in 2008. Sites B and C had internal space to drive into, so the statement “vehicular deliveries/servicing currently takes place in the area of the current/former industrial uses at the site” is not correct, as there has been no activity around these sites for a number of years.

## Refuse Strategy 6.0 Proposed Refuse Strategy

The refuse strategy has been devised as a result of discussions with the council's refuse collection department on meeting held in October 2024.

### Access to site

There are existing collection routes servicing the surrounding residential developments, so these would be used for collectors for the new development. Karts will be dropped next to bin stores to allow for level access. 500 minimum manoeuvring space is provided within the bin stores.

### Bin Store location and access

Bin stores have been located so that these are directly accessible from the road rather than coloured ramp in arrival.

Residents will not have to walk more than 20m on the outside to reach these.

On Sites A and B, internal doors will allow for the residents to deposit their refuse bags without having to exit to the street.

Other units on the Northern corner of Site A will have independent bin stores located off the street.

Site C will have the corner bin store located on corner with Cinnamon Street, as it was not possible to have it within the individual houses.

### Bin storage calculation

Calculations based on the following

Largest size of bins used where possible, to reduce amount of travel.

- 1-Beds: 120 Refuse - 80 recyclables
- 2-Beds: 140lit + 100litc
- 3-Beds: 180lit + 140litc

Prop. #	1-BED	2-BED	3-BED	TOTAL
Refuse	120	140	180	440
Recyclables	80	100	140	320
<b>Total</b>	<b>200</b>	<b>240</b>	<b>320</b>	<b>760</b>
Bin Store Capacity	200	240	320	760
Number of Bin Stores	1	1	1	3

Bins to be purchased by applicant, and recycling bins to be RAL 4008 (Signal Violet) or a very similar colour.

For the small size violet bin (350L), the council has agreed to provide one free of charge due to this being an unusual colour, potentially hard to procure for that size. Refuse will be stored within the retail unit, and put out on allocated collection day.



6.0.01c Bin Store Location

Figure 1 Refuse Storage Strategy

The first line of the Refuse Store Strategy from the applicant's Design & Access Statement Part 2 (figure 1) says:

"The refuse strategy has been devised as a result of discussions with the council's refuse collection department on meeting held in October 2014."

According to the planning officer's comments (see above) this meeting never took place.

2 of the bin storage areas are on the northern part of the site on Cinnamon Street for Sites A and C. The others are on Clave Street and Clegg Street. Refuse vehicles will have to make 4 visits to the sites, where presently there are no such trips. Also the smaller table on figure 1 is illegible.

In the applicant's Appendix G Swept Path Analysis, there is no swept path for refuse vehicles accessing the bin store from Site C.

## **2. Impact on heritage assets and the setting of the Conservation Area.**

The building is located in a prominent position within the Wapping Wall Street Conservation Area, as such the development should preserve or enhance the character and appearance of this conservation area.

National Planning Policy Framework 2012 (NPPF) considers the irreplaceable nature of the historic environment, and to require clear and convincing justification for any harm caused to its significance (NPPF paragraph 132).

"Where less than substantial harm arises, this harm should be weighed against the public benefits of a proposal, including its retention in its optimum viable use (paragraph 134). Considerable weight and importance should be given to the desirability of preserving (causing no harm to) the listed buildings and conservation areas and their settings when carrying out that balancing exercise."

The Planning Committee decided that the "demolition of the existing buildings on site and their proposed replacement blocks would cause harm to a designated heritage asset, namely the Wapping Wall Conservation Area by virtue of the loss of the existing buildings and the design of the proposed replacement buildings.

The Committee's justification for the harm caused to the significance (NPPF paragraph 132) of the Wapping Wall Conservation Area is understood to relate to:

- A The loss of the existing building on Site B; the excessive height of the proposed block, specifically the top storey set back of the proposed block fronting Clave Street within Site A.

- B The excessive height and massing of proposed block C, and its blank façade when viewed in Cinnamon Street.
- C A loss of openness, and sense of enclosure created by the proposed buildings fronting Clegg Street and Cinnamon Street.

In the Wapping Wall Conservation Appraisal, it states

“This is an area of particular special architectural and historic interest, illustrated by its rich history and significant architecture, dating from the 18th century and earlier. The character and appearance of the area, as described in this appraisal, define its special qualities. There are a few gap sites and some minor inappropriate buildings in the Conservation Area, but overall these have little impact on the qualities that led to its designation.”

In the applicant’s townscape statement part 1, chapter 3 it states:

“The western boundary of the Conservation Area is marked by Wapping Underground Station, on London’s first under-river train link to the south bank. The tunnel’s vent shaft and surrounding buildings contribute to the character of the area. Their relatively low scale provides visual relief from the corridor of buildings extending either side along Wapping High Street.”

In its assessment of the proposal in chapter 8 of townscape statement, it continues:

“8.13. The London Plan does not advocate the strategic objective of making best use of land in such locations at all costs. Rather it seeks optimisation by design which we understand to mean achieving the best possible outcomes in respect of all areas of policy, including heritage and townscape.

“8.14. Policy 7.4 and 7.8 and those policies within the development plan dealing with conservation limit optimisation. They require development to have regard to the nature and form of surrounding development. This includes scale, mass and orientation of surrounding buildings. Part B (e) of policy 7.4 requires development to be informed by the surrounding historic environment.

“8.15 The building line of each plot has been carefully considered to provide a coherent relationship with adjacent buildings. The proposals are primarily designed hard up against the back of the pavement, abutting adjacent buildings where possible to restrict gaps between buildings, as is characteristic of the Conservation Area.

“8.21 The unified architectural style, material palette and massing provides a cohesive composition across the three plots. Along with their high quality design this further enhances their transition into the street scene.”

However when considering these policies with the computer-generated images of the development in situ, these principles are not borne out. The new buildings appear intrusive and overbearing and are not cohesive to the surrounding buildings.

Existing

50

- 8.41 The viewpoint is located approximately 30m from the application site outside the Grade II listed Prusom's Island Warehouse looking west along Cinnamon Street towards Plot C.
- 8.42 In the foreground of the view is modern residential infill development that replaced the former warehouse abutting Plot C.
- 8.43 The southern elevations of the existing buildings on Plot B and C, together with the blank wall enclosing the secondary means of escape from Wapping Station on Plot A, feature in the middleground at the junction of Clave Street, Clegg Street and Cinnamon Street. In the backdrop of the view Chimney Court is visible further along Cinnamon Street where the road merges with Brewhouse Lane.
- 8.44 The road is, again, a tertiary route; it is constructed of cobbled materials and has a particularly narrow width. There is no vehicular through route to the east and therefore the road retains a residential enclave character.



Figure 2 Cinnamon Street looking northwest, present

Proposed

- 8.45 The flank elevation to Plot C is prominent in the view. This is not fenestrated in order to prevent overlooking to adjoining residents, in accordance with pre-application advice. The architectural detailing of the elevation, comprising recessed bricks and variation in material palette, does, however, provide relief to the elevation.
- 8.46 The architectural style of the proposed development denotes a residential character to the view. The scale and treatment of doors, window proportions and form of the buildings resonate with the historic industrial character of the area as a whole. At the junction of Cinnamon Street and Clave Street an area of communal space is proposed – safe and well overlooked – that will provide amenity value to the local area.



Figure 3 Cinnamon Street looking northwest after

The CGI above illustrates the impact that Block C will have on its surroundings. It states “the scale and treatment of doors, window proportions and form of the buildings resonate with the historical industrial nature of the area as a whole.”

From this image none of the above is evident. Also the impact on daylight and sunlight on the surrounding properties owing to the marked height differences has not been introduced, so it does not provide an accurate picture.

Site C will also truncate all the southwestern views from current properties on the eastern part of Cinnamon Street.



Figure 4 Wapping Lane looking east along Cinnamon Street present





Figure 5 Wapping Lane looking east along Cinnamon Street after

In Fig 5 looking east from Wapping Lane along Cinnamon Street, the visual impact of Site B on the surrounding amenity is apparent, as is its scale. The curved view of the street is now blocked off by Site C. The tree in the background by Ross House on the left also seems to have disappeared.

#### Existing

- 8.60 The viewpoint is located on Clegg Street looking south towards Plots B and C in the foreground.
- 8.61 The boundary of the Wapping Wall Conservation Area runs along Clegg Street; Plot C falls within the Conservation Area whilst Plot B is within its setting. The existing buildings on each plot are constructed of materials conducive to the areas character and appearance. The quality of the existing buildings are, however, poor and they provide little value to the townscape by virtue of their architectural composition, modern additions and poorly maintained aesthetic.
- 8.62 To the left of the photograph the northern elevation to Plot C fronts the pedestrianized Hilliards Court. The elevation is particularly poorly resolved (see Section 3.0) and this provides a poor aspect to the children's playground that affords little overlooking which would otherwise contribute towards a safe environment.
- 8.63 The cobbled street again adds to the character of the area, although it is considered that the narrow pavement and blank wall alongside the building fronting the street creates a relatively hostile pedestrian environment. The view along Clegg Street is terminated by the blank north elevation of Site A fronting Cinnamon Street. The backdrop to the view is the large warehouses fronting the Thames.
- 8.64 The character of the view is light industrial, although the observer is aware of the residential use of Tasman House and Hilliard Court outside of the photograph to the east and west.



Figure 6 Clegg St looking south present

Proposed

- 8.65 Again, the view from this location will be changed almost in its entirety by the proposed development. The visible elements of Plots A, B and C, fronting three of the four corners of the junction, will be wholly redeveloped.
- 8.66 The presence of windows and doors fronting the street provide a more welcoming pedestrian environment. Block B and C presents two storeys to the street, with a further setback to reduce any perceived overbearing relationship.
- 8.67 The vertical rhythm and architectural style of the windows is characteristic of the area and provides cohesion between the blocks. The previously proposed gates to the Plot B courtyard have been removed with the relocation of the principle entrance. The bin store has been setback from Clegg Street to create separating distance from Tasman House and create an area of hard standing that extends the frontage to Tasman House.
- 8.68 The proposed three storey development on Plot A forms an appropriate response to the termination of the view along Clegg Street; the gable end roof of the eight storey modern warehouse residential development is visible in the backdrop to the view above the proposed balcony, providing scale context. The presence of windows at first and second floor level on either side of the street enhance the level of surveillance.
- 8.69 The character of the view will be primarily residential, although, again, the contemporary interpretation of nineteenth century warehouses will provide a contextual response to the appearance of the area.



Figure 7 Clegg Street looking south after



Figure 8 Cinnamon Street looking west



Figure 9 Cinnamon Street looking west

On the above image it shows the character of the surrounding buildings and the impact that Site C will have on 18 Cinnamon Street, which will be 2 storeys higher than the present building.



Figure 10 Cinnamon Street looking northwest

### **3. Environmental Concerns**

The Turk's Head Charity would also like to have noted the issue of coal tar seepage into the tunnels of Wapping Overground Station.

No further information has been given in support of the application to address the concern of coal tar. For this reason we would like to object for reasons of public safety.

There is an issue with coal tar seepage between Sites A and C but no mention of remediation. In its land contamination assessment prepared by URS Table 7.1 it states:

"The gasworks may represent a contamination risk to the site by migration of mobile contaminants within shallow groundwater. Likelihood of contamination related to the former off-site gas work is considered medium".

An executive from the Health and Safety Executive from Transport for London confirmed the following:

"We still have issues with the ingress of coal tar from a former gas works. A system of gutters and interceptors is in place to capture the coal tar and to prevent it from being discharged into the River Thames".

In its MDD on Contaminated Land policy DM30 states:

"Where development is proposed on contaminated land or potentially contaminated land, a site investigation will be required and remediation proposals agreed to deal with the contamination before planning permission is granted".

There is no evidence of this being forthcoming.

Also, the Turk's Head Charity requests that comments from Transport for London made on the withdrawn application PA/15/02440 need to be examined alongside this application.

See letter below from planning application PA/15/03561 from Tom Matheou.

**From:** Matheou Tom  
**Sent:** Tue, 9 Feb 2016 10:05:09 +0000  
**To:** Kate Harrison  
**Subject:** PA/15/03561, Site at 14 to 16 Clegg Streetm 13 to 15 Cinnamon Street and 125 to 129 Wapping High Street  
**Attachments:** PA1502440 Site at 14 to 16 Clegg Street, 13 to 15 Cinnamon Street and 125 to 129 Wapping High Street, London

Kate,

**RE: PA/15/03561, Site at 14 to 16 Clegg Street, 13 to 15 Cinnamon Street and 125 to 129 Wapping High Street. Partial demolition of the existing buildings and redevelopment of the site for residential use (class C3) and retail use (class A1); hard and soft landscaping, cycle parking and all other works shown on the submitted drawings**

Thank you for consulting Transport for London regarding the above mentioned application. The site is located above London Overground tunnels and therefore TfL are concerned with the impact of the development on the safe and normal function of the tunnel bellow.

TfL initially commented on the proposals above under PA/15/02440. However, the applicant withdrew that application and resubmitted it as PA/15/03561 with some changes. Having reviewed the details of this new application, TfL request council to retain our initial Infrastructure Protection comments.

Many thanks,

Tom

**Tom Matheou | Assistant Planner**  
**TfL Planning, Transport for London**

E: [TomMatheou@tfl.gov.uk](mailto:TomMatheou@tfl.gov.uk)

T: 020 3054 3649

A: 10<sup>th</sup> Floor, Windsor House, 42-50 Victoria Street, London SW1H 0TL

*For more information regarding the TfL Borough Planning team, including TfL's Transport Assessment Best Practice Guidance, and pre-application advice please visit <http://www.tfl.gov.uk/info-for/urban-planning-and-construction/>*

