

Draft 2. 26.11.14 12.44pm

**The Spitalfields Community Group**  
C/O Charles Gledhill  
Fournier Street  
London  
E1

Nasser Farooq  
The London Borough of Tower Hamlets  
Development Control  
Mulberry Place  
5 Clove Place  
London E14 2BG

26th November 2014

**Re: The Bishopsgate Goodsyard. Application ref: PA/14/02011 and PA/14/02096**

Dear Sirs

I write on behalf of the Spitalfields Community Group Committee to object to the above mentioned planning applications and development proposals.

I have attached a letter of objection issued by the Spitalfields Society and advise that though there are some in the SCG committee that have few objections to the development, a significant, overwhelming majority support the arguments against the development listed in the attached letter.

The SCG acknowledges that they are not against sensitive redevelopment, and whilst there is an obvious need to support the redevelopment of the site and the developers need to achieve a reasonable profit on their risk and investment, there is concern that this intensity of redevelopment is somewhat excessive.

We would add, that it is with some disappointment that the suggested height of the twin towers is not entirely accurate and the height of at least one of them will be closer to 51 storeys, almost twice the height of the adjacent Avant-Garde Tower. We urge Hackney and Tower Hamlets Planning and Conservation officers to visit the site and compare/contrast a development twice the size of the approved Avant Garde development in front of them

Furthermore, the excessive use 'Core10' (rusty steel, a largely transient, trendy, perhaps soon to be embarrassingly 'old hat' material) is both short sighted and ill considered. The 'rustication' of the public staircases etc and its re-use on the signal box could be considered a crass attempt at historic integration, ageing a structure before its time, mock shabby industrial chic. Industrial pastiche? East London 'edgy' ? 'Shabby chic' gone mad? We are all aware of the staining issues associated with this material and its poor tactile qualities. Perhaps the developers should have imported some of the rusting skeletons of the battersea power station too? Is this steampunk madness?

The lack of realistic, tangible and affordable facilities and opportunities for Creatives, Artisans, Tech Startups, and small Trades/Crafts people is also a significant cause for concern.

The phased, outline/detailed planning approach could be considered a cynical and disingenuous approach by the developer, and their planning advisors, steam(punk)rolling the development through the planning system without due community and local authority consideration and consultation. The 'outline' approval approach will straightjacket both LB Tower Hamlets, LB Hackney and the local communities into accepting excessive overdevelopment, saddling us all with feral, greed driven regeneration.

We urge you to reject this application. More importantly, we urge TH and Hackney to not abdicate your community responsibilities by passing the final decision making process to the Mayor of London.

Yours sincerely

Paul Johnston  
For and on behalf of the  
**Spitalfields Community Group** Committee

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**THE SPITALFIELDS SOCIETY**

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Nasser Farooq

The London Borough of Tower Hamlets

Development Control

Mulberry Place

5 Clove Place

London E14 2BG

24 November 2014

Dear Sirs

**Re: The Bishopsgate Goodsyard. Application ref: PA/14/02011 and PA/14/02096**

I write on behalf of the Spitalfields Society to object to the development proposals for the Bishopsgate Goodsyard that are the subject of the above applications for planning permission for the following reasons:

1. **Conservation Areas:** The proposals do not preserve or enhance the character and appearance of the adjacent Conservation Areas. The published views of the development from the Boundary Estate, looking west down the Bethnal Green Road and north up Elder Street demonstrate beyond any doubt or debate that the proposed development will severely harm these unique Conservation Areas.
2. **Listed buildings:** The proposals do not preserve or enhance the setting of the many listed buildings in the area. The before and after views from the Boundary Estate and looking north along Elder Street, both areas that contain numerous listed buildings, demonstrate that the proposed development is extremely harmful to the setting and context of these listed buildings.
3. **Character:** The proposals are grossly out of character with the surrounding area because of their bland, corporate style that has no sensitivity, reference or relevance to the prevailing style of large brick warehouses and apartment blocks that characterise the townscape of the Shoreditch area or the lower highly varied terraces of smaller properties that characterise the Brick Lane and Spitalfields areas.
4. **Overshadowing:** The proposals overshadow a great many adjacent buildings, particularly on the north side of the Bethnal Green Road, They will also overshadow part of the Boundary Estate, one of London's first and most notable social housing developments.
5. **Increased sense of enclosure:** The wall of tall buildings along the south side of the Bethnal Green Road will completely cut off the existing commercial and residential buildings on the north side of the road from visual contact with the City. This will have a dramatic effect on the character of the area, particularly of the Redchurch Street Conservation Area, enclosing and isolating it from the City to the south.
6. **Loss of light:** It is acknowledged by the developer that 43% of the surrounding buildings will suffer a major loss of light but it is also the case that all surrounding buildings will suffer a significant loss of light due to the massive scale of the proposed buildings. Those on Shoreditch High Street will feel the effect mostly in the morning, those on the north side of the Bethnal Green road will be badly affected throughout the day and Brick Lane and areas to the east will feel the impact in the afternoon and early evenings. Furthermore, the park created on the railway arches will be cast in shadow in the late afternoon and evenings by the combined mass of the two tall towers, very much diminishing its value at a time of potentially its greatest public use.
7. **Height:** The height of the proposed twin towers is unsuitable and incompatible with the surrounding townscape. Clearly the applicant sees the Goodsyard as part of the City and not part of Spitalfields, Shoreditch or Brick Lane. These latter areas enclose the site on all sides and it is wholly incorrect to claim the area as part of the City or to view its redevelopment as part of, or an extension to, the City.
8. **Massing:** The proposed massing of the two tall towers and the wall of very tall buildings along the south side of the Bethnal Green Road are wholly unsuitable and incompatible with the townscape of the surrounding area that is an overwhelmingly low-rise historic neighbourhood containing no fewer than five Conservation Areas and primarily defined by low to medium rise brick light industrial warehouses and residential terraces.
9. **Loss of historic fabric:** The proposals include the loss of a significant amount of historic fabric of the unique railway architecture of the Goodsyard including the brick arches (vaults V1 to V11) and the boundary wall running along Commercial Street. This follows decades of gross neglect of the area and its unique historic fabric by Network Rail, its current owners, and the needless demolition of large areas of the Victorian railway arches prior to building the new station. Perfectly viable community uses that both cared for the

historic fabric and found worthwhile temporary uses for them have also been evicted for no good reason at all.

**10. Disregard for retained historic fabric:** *The poor use of significant elements of the remaining arches and its adaptation with the loss of the ramp and large holes formed within the roof of the London Road and listed arches is harmful to both the actual fabric and overall integrity of the historic structures. The restoration of the three small listed houses in Sclater Street follows many years of scandalous neglect. These houses should have been repaired many years ago when there were offers of assistance from the Spitalfields Trust. However money and time was merely wasted on mothballing them with damaging temporary structural propping and rudimentary weather protection.*

**11. Damage to present business uses:** *The proposals will seriously damage the character and reputation of the area as an area for the creative, media and tech industries. These businesses seek properties that suite their creative and individual styles and have a far more youthful profile than traditional City businesses. The large warehouses of Shoreditch, and most notably the Tea Building, suit these businesses very well. This is a model that is repeated in cities around the world from San Francisco and New York to Hong Kong and Sydney. The corporate glass office blocks located over retail space and transport infrastructure is an anathema to the young creative, media and tech industries and will drive these industries away. This will be particularly damaging to the London Borough of Hackney. In short, the proposed offices are the wrong sort of offices.*

**12. Insufficient employment space:** *The area is one of employment growth and fast developing business uses. The proposed scheme creates an insufficient proportion of employment space which is then located in areas left over after planning the prime space for residential use. It lacks the flexibility and variety of workplace sizes required to accommodate the initial establishment and subsequent growth of the many new start-up businesses in the area. Derwent has demonstrated the value of reusing the traditional brick warehouses at the Tea Building for such accommodation. British Land is also demonstrating on the Nichols & Clarke site that large scale viable redevelopment can be achieved in this area with a mix of new build and refurbishment at a human scale and in a manner that supports established business uses. The scheme proposed here does not, and relies on attracting traditional "old school" banking, accountancy, legal and insurance industries into an area where such occupiers will damage and eventually destroy the creative, media and tech industries that are such a large driver of growth in this area, and for London and the country as a whole.*

**13. The proposed housing is the wrong sort of housing:** *There is no commitment to affordable housing in the scheme, although there is a vague suggestion that 10% might be provided. This is drastically below the 50% required by both Tower Hamlets and Hackney. Tower Hamlets has some of the highest child poverty rates in the country and one of the longest housing waiting lists and it is a disgrace that such a major development should so disregard these circumstances within the local community within which they propose to build.*

**14. The proposed retail accommodation is the wrong sort of retail accommodation:** *The developer has engaged a sequence of retail consultants on this aspect of the scheme, all of who have completely misunderstood the strong retail drivers in the area and how these might be supported and developed. All have spoken of the dynamic, independent and creative qualities of the existing retail environment but all the scheme offers is a shopping mall wholly unsuited to the local retail operators. Again, like the offices, one knows it will be occupied by the same mix of corporate and national brands and that, by not being supported, the local retail environment with its emphasis on individuality and "making" as well as retailing will die.*

**15. The architectural style, details and materials:** *These are not sufficiently resolved to properly comment upon let alone allow a planning permission to be approved. Many of the buildings are just ghosted into the visuals as though the developer is saying that the scheme is too big to design before it is approved. The towers, being residential and the main driver of the scheme for foreign investors, has received more detailed design but the bizarre use of brickwork at above 40 storeys high gives one some idea of the applicant's muddled thinking in trying to reconcile city skyscrapers with the low rise brick buildings of the local vernacular architecture.*

**16. Vehicular access:** *Vehicular access is wholly insufficient for the volume of residential, office and retail accommodation proposed. No realistic analysis is apparent of the traffic to be generated by the scheme when in use. To date the station has been developed and opened without any attempt to accommodate the greatly increased footfall with the result that commuters to the City and Shoreditch are left to meander through a grid of residential streets, cross major roads without the benefit of appropriately located pedestrian crossings, and are offered no signage or directions. The proposed scheme seems designed to massively increase this chaos as no clear route has been resolved between the residential areas, the station or the proposed public park and the City to the*

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south. The applicant's refusal to bridge over the railway lines, as has been achieved at Principal Place, has negated against them finding an effective solution to this problem.

**17. Road connections:** The size, configuration and junction design of Braithwaite and Wheler Street, particularly where it joins Commercial Street is wholly unsuited to the volume of traffic that will be generated by the proposed development of the twin towers and associated office and retail space, all of which is proposed to obtain vehicular access from Commercial Street via this one junction. This is an awkward junction with very poor sight lines even at the moment when being used by very light traffic (since the closure of Braithwaite Street) and the notion that it can accommodate all the traffic, deliveries, taxi visits, servicing vehicles, refuse collections, etc, etc, for 700 flats and a major office development and shopping mall is completely ridiculous.

In conclusion, this is the most poorly conceived and damaging development that this Society has ever been asked to review. It promises to undermine a great many aspects of the area, whether historic, social, cultural, or commercial, that local residents, the working community and the great many visitors to the area love and value. It also undermines the astonishingly successful and highly valuable growth of the creative, media and tech industries in the area with the greatest concentration of start-up businesses in the country. This would be an astonishing own-goal if it were allowed to happen and would be a massive loss to the area, to London and to the country as a whole.

For these reasons we argue that this proposal is emphatically not regeneration as the applicant claims. It is regeneration in reverse. It is in fact degeneration.

We usually end these letters with a respectful request that the Council refuse the application however, in this instance, we are asked on behalf of the entire residential and business community of Spitalfields, to demand that this application be refused outright. It is also requested that this highly significant site, which is after all still in public ownership through Network Rail, be the subject of a properly consulted master plan by the two authorities working in partnership that might guide a far more sensitive, detailed and sustainable form of development of which all of London can be proud.

Yours faithfully  
Rupert Wheeler  
For and on behalf of the Spitalfields Society