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Planning and Building Control
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By email to: Development.control@towerhamlets.gov.uk

Matt Melbye
St Katharine's and Wapping Ward Panel
14 Portland Square
Wapping
London E1W 2QR

20th September 2024

Dear Sir/Madam,

RE: PA/24/01545/NC | Change of use of first, second and third floors of existing building from ancillary community training facilities used in connection with the existing ground floor pre-school facility (Use Class E) to a Substance Misuse Recovery Centre (Sui Generis) with associated internal alterations at ground floor level to form a separate and self-contained entrance from Meeting House Alley. | 15 Chandler Street, London, E1W 2QL

I write in my capacity as the chair to the St Katharine's and Wapping Safer Neighbourhood Ward Panel. The Ward Panel reflects the Mayor of London's Mission in providing local engagement and oversight of the resident's community safety concerns.

I am writing to formally **object** to the planning application.

We understand that the applicant has not had any meaningful consultation with existing business, stakeholders or residents prior to the submission of the planning application. Nor have they offered any supporting evidence demonstrating the need for such a facility/provision within Wapping.

Our major concerns/objections with the application are –

1) Health and safety issues -

- a) Considering a nursery is located within the same building as the proposed facility is raises significant concerns in safeguarding both children, (ages 1 – 4), parents, siblings and staff.
- b) Considering the nature of the proposed facility it is safe to assume that in part some of the client/user base may be considered a risk to the general public and or volatile considering treatments that they may be under.
- c) No risk assessment has been conducted.

2) Crime (and fear of) –

- a) The location is not a specific crime and Anti-Social behaviour, (ASB) hotspot. Considering the increase in traffic and likely client/user base it is reasonable to expect that it will encourage/invite others that will likely prey on those attending.
- b) Considering the nature of those individuals encouraged/invited to the location it poses a significant threat of an increase in crime (and fear of) to the immediate and reaching environment.

c) No risk assessment has been conducted.

3) Detrimental impact upon residential amenities –

- a) The proposal would demonstrably harm the amenities enjoyed by local residents, in particular the right to enjoy a quiet and safe residential environment.
- b) The site is located in a predominantly residential area where occupiers could reasonably expect a level of amenity concurrent with the property. The use of the property as a Substance Misuse Recovery centre introduces a diverse element that by reason of the use is likely to result in noise, disturbance and nuisance, crime (and fear of) to the detriment of neighbour's residential amenity

4) Access –

- a) The proposed entrance to the facility on 'Meeting House Alley' has a pavement depth of 990mm from end of curb to wall. Statutory requirements are that pavements should be 1500mm wide to accommodate a wheelchair and passers-by. Therefore, the proposed facility will not be able to accommodate disabled users. Reducing its accessibility, operational ability and discriminative in its nature.
- b) The location is limited in accessibility by public transport. Serviced by the Wapping Underground station, (No wheel chair access), to the South. The 100 bus route running from St Pauls EC1 to Shadwell Station E1. The D3 bus route running from Bonner Road E2 to Leamouth/Orchard Place E14.

Planning Statement –

2.4 – In terms of neighbouring uses, there is a housing estate directly north (Reardon House), the Wapping Health Centre to the southeast, Wapping Green Park to the south and the Hurtado Jesuit Centre to the West on Chandler Street.

Note - This facility would be located within close proximity to local businesses, service providers and residential units

Step by Step nursery Within the same building – 15 Chandler Street E1W. A private business that accommodates a maximum of 52 children aged from 0 – 4 years old.

A children's playground directly opposite the building. (Approx. 14 meters away).

Reardon House, Reardon Street E1W. 69 residential flats with significant young family occupancy. (Approx 34 meters away).

Lowder House, Wapping Lane E1W. 25 Residential flats with significant young family occupancy. (Approx 74 meters away).

Altab Ali House, 11 Reardon Street E1W. 18 Residential flats with significant young family occupancy. (Approx 150 meters away).

Flats above The Wapping Practice, Wapping Lane. 14 Residential flats with significant young family occupancy. (Approx. 28, 74 & 86 meters away).

JRS, Jusuit refugee service located at 2 Chandler Street E1W 2QT, (Approx. 21 meters away).

Puddle Jumpers Nursery located at St Peters Centre, Reardon Street E1W 2QH, (Approx. 79 meters away).

The Wapping Group Practice located 22 Wapping Lane, E1W 2RL, (Approx. 82 meters away).

St Peters Church, Wapping Lane E1W 2RW, (approx. 69 meters away).

Pollyannas Training Theatre, Raines House, Raines street E1W 3QQ, (Approx. 122 meters away).

4.1 – Planning permission is sought to change the use of first, second and third floors of the building into a Substance Misuse Recovery Centre, which would be accessed independently of the existing ground floor nursery via the secondary entrance on Meeting House Alley with the necessary building alterations being undertaken internally to ensure a full self-containment of the use. No alterations would be needed externally to facilitate the proposed use with the existing bin store in Meeting House Alley continuing to serve the combined refuse/recycling needs of the dual uses, which would also extend to the current cycle

parking provision adjoining the Chandler Street entrance, which latterly would be allocated for the sole use of the nursery.

Note – There is a significant possibility that clients/users to the proposed facility will either attempt or enter the main building from the nursery entrance on Chandler Street. Traffic is likely to come from Wapping Lane with the Chandler Street entrance the most foremost entry point.

4.3 - The standard opening hours would be Mondays to Fridays 9am-5pm, with most of the users/clients expected to enter and leave the premises between 10am and 4pm respectively. Most of these arrivals would be by prior appointment only and there are likely to be some occasions where the building is used outside of the normal opening hours in the early evening or at weekends. There would typically be expected to be in the region of 20-30 users/clients per day arriving at various times of the day for appointments lasting an average of one hour in duration (with some extending to 3-4 hours according to need). The appointments would normally be conducted between the hours of 10am-4pm.

Note – The term ‘most of the users/clients’, ‘likely’ and ‘normally’. This indicates that there will likely be a cross over of clients/users of the facility and Nursery traffic. ‘20-30 users/clients’ will be a significant rise in traffic to a location with minimal pedestrian walkways.

5.4 The site is also situated within the ‘Wapping Neighbourhood Area’, albeit with no currently designated neighbourhood forum.

Note – Albeit the St Katharine’s and Wapping Safer neighbourhood Ward Panel of which the council has not consulted with.

6.29 - The proposed use would be fully self-contained from the existing children’s nursery, which would continue to operate at ground floor level with access maintained from the Chandler Street entrance. It would be accessed from its own dedicated entrance on Meeting House Alley with the existing bin store and cycle parking shared on the basis that this can continue to meet the combined needs of the dual use. The core service provision in the Recovery Centre will be from 10am-4pm and while there will inevitably be some overlap with the existing nursery operation (from 7.30am-6.30pm), the instances of users/clients entering/leaving the facility at the same time as parent drop-off and pick-up times at the nursery are likely to be infrequent. It is also notable how an equivalent facility at 183-185 Whitechapel Road has successfully operated alongside an existing nursery without any cause for concern, which provides helpful evidence that the uses can appropriately coexist without any risk of conflict or public safety concern. Hence, it can be reasonably concluded that the ‘agent of change’ planning principle would not be engaged in this respect.

Note – The facility at 183 – 185 Whitechapel Road operates along side a nursery. Not within the same building. Whitechapel Road is a primary A-road with multiple bus routes and cycle lanes with no immediate residential neighbours. It is well lit with the pavement width from the Reset Centre, (183-185 Whitechapel Road) to curb measuring 8.8 meters. Chandler Street. Meeting House Alley is a small cobbled road with restrictive pavements, illumination and visibility.

For the reasons as stated above we therefore request that this Planning Application be rejected and that the council seek an alternative building in which to house this facility/provision.

Yours Sincerely,

Matt Melbye
Chair
St Katharine’s and Wapping Safer Neighbourhood Ward Panel