

## **INTRODUCTION**

The KCAAC welcomes the intention to regenerate Dalston. The idea of building over the railway line is a positive one. As a group we welcome good contemporary design and we would not reject tall buildings out of hand. However, any tall building need to be exemplary and of the highest calibre of design. Equally (and in a way more fundamental) the way in which such a building connects to the existing urban fabric at ground level is of paramount importance. For Dalston, the way in which the scheme works for pedestrian movement and the existing street pattern will make or break the success of the scheme for future generations.

We think that some of the fundamental strategies being proposed are flawed and need to be re-thought in order that we do not build a slicker version of one of the appalling 'town centre' schemes from the 1970's. Our biggest concerns are the density of development, the sunless square and the location of the bus park and the way those elements act together. This is a one off opportunity for Dalston and it is the only chance to ensure a good future for Dalston.

Our comments on the following pages refer to the two schemes as a single entity. This is because in the absence of a masterplan, the two schemes can not be considered in isolation. The Council should resist considering the TfL schemes on its own, unless a proper masterplan is produced that forms the development brief for future building.

These comments have been prompted by the invitation to comment on the consultation exercise, and we will make further comments once the plans have been deposited.

01

### **The consultation has been inadequate and hurried**

The consultation has been inadequate. The initial public presentations consisted of plans only, with no elevations or models. It is only recently that a model has been shown which shows the full impact of the development – albeit that the scale of the model is very small.

The presentation of the schemes has not given members of the public sufficient visual information to allow any lay assessment of what the schemes would look like to the people living in the area.

The questionnaire asked if the public supported the idea of regeneration for Dalston. Of course they do, but they would like to know what kind of regeneration is being proposed

02            **Inadequate drawings**

There are still no elevations showing the scheme from Kingsland Road. It is like being asked to choose a jacket, but only be given a rear view. The scheme has been inadequately presented. At the public exhibitions, the plans on the LDA boards did not even have the benefit of north points on their layouts. How are lay people to assess this information?

03            **Misleading imagery**

At the same exhibition, (and also within the .pdf's of the consultation material), an image of a mews house was used (the photograph of tree lined traditional street with red doors). We do not understand why, unless the intention was to mislead.

The second board at the exhibition – which was the first board in the series to show the Dalston Lane South scheme at a larger scale – had the new square shown next to an attractive looking (very) green space surrounded by buildings. In the normal sequence of presentation, one would assume that this was a ground plan, not a plan at fourth floor level. In this regard, the presentation was misleading. On the boards one had to look hard for the label 'Level 4 Plan'. The green colour has been toned down for the printed material, and the label 'Level 4 Plan' looks more legible but the impression of a ground layout remains.

04            **Presenting the wrong information**

The largest double A1 spread of presentation boards showed the McAslan scheme seen from the east. The drawings are not easy to comprehend in three dimensions. A perspectivised elevation would allow a full appreciation of the complex changes in level at the base of the scheme to be fully understood. In terms of priority, would it not have been better to elevate the sections showing the entrance into the scheme from Dalston Lane and from Kingsland Road? Our concern about how the changes in level work is very real, and at this stage should be properly illustrated

05            **Consequences of simplistic presentation on the consultation**

In summary, while claims can be made about the opportunities for the public to comment on the proposals, in reality the proposals have been presented in a severely limited in a way that flatters the scheme and has made it impossible for the public to be aware of the real impact on Dalston. We hold that had the presentation shown (and it is well within the competence of the decent architectural practices working on the project) the full visual impact of the scheme, then there would have been strong objections to the scheme on material grounds of over density, building height, affect on the surrounding area (including the adjacent conservation areas) and impact on Kingsland Road, This is contrary to the UDP

06            **Visual impact on adjoining areas**

No information was given to show the impact of the development on the adjacent conservation areas.

07

**Insufficient three dimensional information**

Consultation needs to be informative. Having decided to engage the public, the presentational material needs to allow the citizen to engage in a way that comments can be meaningful. It also must not be misleading, There are many 3 dimensional drafting aids available to-day that allow real views of the scheme from real vantage points in the surrounding neighbourhood. No attempt has been made to use these tools. How are the public meant to decide on whether the scheme is a good idea? For such an important scheme of such visual impact, this is not acceptable. It runs counter to the idea of community engagement. As a group we have continually asked the Council to demand better presentations of important schemes so that the public can make informed comment. We also do not believe that the planning department can properly assess these types of complex schemes without this information.

08

**Lack of successful precedents**

When asked by members of the public, the architects of the scheme were not able to come up with precedents to illustrate why their proposals should work. They claimed the scheme is unique. The request for real tangible parallel precedents is not unreasonable. We want to see examples of similar spaces of similar size and orientation surrounded by tall buildings to demonstrate that this scheme is a good design. We believe that they may not be able to find attractive precedents, because they do not exist as successful examples.

09

**No illustration was given of the alternative scheme - continually referred to - for people to consider**

The only option declared to the public by the promoters of the TfL scheme has been that the choice is to either approve the project as it stands, or it will not happen and the result will be an 'open cutting'.

The community has been asked to accept this scheme or Dalston will be left with an open cutting. Has the case been overstated by the applicant in public consultaion – it has been a rather threatening way to put the argument.

We have not been shown what that option of an 'open cutting means'. It may be more attractive than the proposals as they currently stand.

10

**The proposals do not integrate into the existing street pattern**

One of the keys elements to the success of a proposal such as this is the way in which it engages with the existing street frontages. There has been no presentation of this material from the viewpoint of a pedestrian at ground level. An extensive section of the Kingsland Road elevation is to be removed and the remaining gap will have a disproportionate effect on the main street. And yet it is only a bus stand. We question fundamentally whether that is the right 'landmark' for Dalston. Will it be referred to as 'the gap'?

11

**Lack of a masterplan that extends beyond the immediate site**

We have seen no evidence of proper masterplan studies appropriate for a regeneration scheme of this scale. By this we mean graphic demonstrations of how the schemes are embedded into the surrounding fabric. The presentations only concentrated on a discrete and tiny portion of the Dalston area. This significant development is of a size that warrants analysis of the

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larger context. The way in which the scheme has been described in public (eg pedestrian magnet, new east-west connections etc) has remained verbal and rather simplistic. All the words are good and well meaning, but not substantiated by the reality of what we have been shown to date. No empirical evidence has been given which show that this scheme might work in the way the words describe. There are modern methods of assessing movement patterns through the urban fabric, such as the space syntax tools developed by London University.

12 **We question the quality of public space**

At the first consultation with TfL we had been told that the grand steps were leading to something special, (that something could not be disclosed because of commercial confidentiality) We now know that the steps lead to a narrow, dark canyon. Both the model and the “ east/west section through the scheme looking north” in the LDA document show a vertical face at the western end of the tree lined space that the steps lead to/from.

13 **Eroding the character of Kingsland Road**

What will also have serious consequences is the pedestrian entrance from Kingsland Road. This looks so interesting on the LDA Dalston lane south document titled “Masterplan: an opportunity for Dalston” and yet turns out to be merely a bus exit onto Kingsland Road. The gentle graphic presentation of the plan is misleading. By its very size this new opening in the urban fabric will have a major impact on the street . As currently shown, it will look more like a hole in the street – like bomb damage or dereliction. The insinuated balance of the muted colours and tree lined spaces belie the truth that the major entrance off Kingsland Road will be a through a gap in the existing street scape leading into a bus stand – no doubt complete with stationary vehicles belching diesel fuel.

14 **Disproportionate size of the bus service yard**

The same plan illustrates the imbalance between the size of the Dalston Lane throat/junction with Kingsland Road, and the very wide opening formed in Kingsland Road by the sweeping away of the Oxfam shop This ‘gateway’ has had no attention paid to it in the consultation, and yet it is the one street element that will have a major visual impact on people at street level in Dalston. As the opening is to be full of buses, it is not going to be the attractive entrance portending a dramatic space beyond.

The long bus space – although tree lined – is not overlooked, and does not look like a safe place for pedestrians to be.

15 **Logic of the need for a bus stand not adequately explained**

We have been told that bus services will terminate here, and the public will transfer to trains to continue their journey into the city. This seems fundamentally flawed as an argument. Buses have priority on our roads. The stretch down into the congestion zone is quite quick. It is not credible that when about seven minutes from a destination, passengers would willingly spend five to seven minutes making a transfer onto another transport system that will then take an additional few minutes to reach their destination. How will pricing work? The shift from bus to train will cost extra (based on current practice).

We do not think that removing part of the high street frontage for a 'bus-stand' is a very civic thing to do. It was emphasised to us that this is NOT a bus station. Nor is it a depot – with all its ancillary maintenance requirements. If its primary purpose is to allow drivers to have a welcome and deserved break and up of coffee, surely a more appropriate space could be found. This is a high street, not a bus park!

16                    **Overshadowing and lack of sun**

The few drawings which had shadows cast on them were showing optimal shadows with the highest solar altitudes. They were not qualified by caption, or balanced by illustrations of how the public spaces would be severely overshadowed throughout most of the year. The photograph of the study model, in the printed material shows unrealistically short shadows, not representative of the normal impact of the building mass on itself or the surrounding area. The accompanying ' Preliminary view across new public square towards proposed library building' shows people sitting out at café tables surrounded by trees. The view is too abstract, showing no shadows other than to the soffite of building surfaces.

17                    **New Square overshadowed by towers**

One of the givens of the current scheme, is that the public open space – the square – is on the north side of the development. We have been told that this has to be the case, because it would be too expensive to build in the location of the square. However, both proposers of the Junction site and the Dalston Lane site are in agreement that in an ideal world this is precisely the wrong orientation for a public open space at this latitude. This fundamental flaw is compounded by the proposed height of the development around the west, south and east of the square that renders the space unsuitable for the activities so beguiling described.

18                    **Windy spaces**

We think that the schemes as proposed will result in windswept, and consequently unpopular spaces. No evidence was given to the contrary

19                    **Unsubstantiated claims of pedestrian movement**

We believe that the onus is on the applicant to give further information as to how pedestrian flows will work for the current scheme. We challenge the claims and want access to expert opinion who may well confirm our observations that at a profound urban level the proposal is dysfunctional.

20 **Unsafe spaces for pedestrians**

We believe that the depth of the transfer structure over the railway creates a visual barrier to pedestrians. Pedestrians will see no destinations over the barrier, and this will have an extremely detrimental effect on the scheme and the way in which pedestrian flows will actually work. The claimed natural policing will not happen. People will not use the routes. It will not feel safe. The banner headline claim 'Improved pedestrian safety and access' used on the publicity document has not been substantiated.

At public consultations, the presenters have got very woolly about the changes of level on the site – other than having a very straightforward explanation as to the reason why the level changes are needed. The resolution of the levels is fundamental to the success of any pedestrian friendly scheme and we do not believe that they have been resolved in the designs proposed. We are concerned that the fundamental layout of the existing proposal may be flawed in that the master plan precludes the sensible resolution of the changes in level required by the transfer structure, and the claims for satisfactory pedestrian movement. As an example of what happens when these issues are not resolved, one only has to revisit the 1960 and 1970 proposals for the optimistic plans to pedestrianise parts of the city of London, where changes in pedestrian levels were so user unfriendly that the next thirty years were spent in trying to resolve their legacy.

21 **Insufficient explanation of the commercial viability**

TfL have emphasised throughout the consultation, that they are making a financial gift and that they are actually going to lose money on the project.

If this is to be used as the justification for the density of the development then we would expect this to be clarified in some detail as part of the public consultation. The claim has not been substantiated. While the transfer structure is a very expensive piece of engineering, at some £25 to £30 million, it also liberates a sizeable chunk of 4 acres of development land. This alone has a significant value of many millions of pounds. What TfL have not been able to disclose, is the cost to the over-slab developer to buy the right to build on the slab and the financial drivers that result in such dense development. We have an incomplete picture presented to us, and in this respect the consultation is not adequate.

For instance, why does the development have to be so dense in order to make the scheme financially viable?

Would a less dense built out scheme reduce the cost of the slab so that TfL do not need such a thick slab – thereby reducing the cost of the slab. Would it not be better to build a structure that does not need to carry such heavy loads?

By reducing the cost and thickness of the slab, two things would be achieved at once,

A) a more appropriately scaled scheme

B) the possibility of having an open space with an appropriate orientation

Hackney's agents have not explained why their scheme needs to be so dense and buildings so high. Off site disposals and transfers are part of this interesting equation. We would expect that the Council would want to engage

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the public in their explanation or how the scheme works financially for the benefit of the community particularly as the authority owns the land and will be the authority granting planning permission .

If the economics change, the design could also change.

22                    **No demonstration that the proposed shopping is going to work**

Our fear is that the provision of shopping for the scheme could result in voids with the consequence that we would be left with a threatening environment in and around the station. The reason for this is that the rents required to support the scheme financially may not be affordable, and that the street pattern, windiness, overshadowing etc referred to above will mean that many of the shops will not be attractive to potential occupants.

23                    **Inadequate information on any anticipated Section 106 agreements or other benefits/controls was given**

At this stage of the consultation, it would be useful for the community to understand what obligations would arise from the permission to develop.

24                    **Economic sustainability**

In terms of sustainability, we do not believe that the project will help local businesses. Already rents have doubled on Kingsland Road, as people indulge in speculation.

25                    **The questionnaire given out was inadequate**

The 'ballot' box questionnaire has struck a new low in public consultation, the leading question being "Dalston will benefit from regeneration" agree, disagree etc. It also conflated issues of shopping and Library and we felt it was a lost opportunity to restrict the responses by the questions asked.