

POSITION STATEMENT

Neptune Wharf – LBTH Response

In respect of Session 2
Issue 2 – Homes and Jobs (Policies 4.1 to 4.7 inclusive)

**London Borough of Tower Hamlets
Fish Island Area Action Plan
Local Development Framework
9 July 2012**

This statement provides the Council's response to the issues stated within Neptune Group's Position Statement Homes and Jobs - Policies for hearing session 2 of the Fish Island AAP Examination in Public. It does not seek to repeat information relating to the Council's position as stated elsewhere.

Issue 1

We highlight in our representations that there is a confusing series of references to the potential land-use approach within different so-called 'character areas', that the existing character of the area is underestimated and that this would, in a spatial strategy that seeks to rely heavily on existing character to define development, undermine delivery.

It is unclear within the AAP as to how the land-use approach within the various different designations will be implemented. For example, Key Diagram 2.1 identifies residential-led regeneration on the waterfront areas and mixed-use regeneration within the central area of FI. However, there is no clarification within the accompanying text in the relevant sections of the AAP to provide clarity / comfort that the residential-led areas will, for example, be expected to provide a greater proportion of any development as residential.

We suggest a revised policy 4.3 to provide clarity on this issue. The LPA's reluctance to offer clarity is not founded on any sound rationale.

Council's Response:

- 1.1 Agree. The Council recognises the need to provide further clarity on the land-use approach for the area identified as 'mix-used' and 'residential-led' regeneration in the supporting text. The following wording will be added to paragraph 4.18.

"Development within the mixed use area will be expected to provide a balance of residential, commercial, and other supporting uses to create a vibrant and diverse community. Residential-led development will be expected to provide predominately residential which can be complemented by other uses such as community and commercial."

Issue 2

This point is important in the context that, as highlighted below, we consider that the AAP adopts an unnecessarily constrained approach to housing numbers. If such an approach to upper limits is to be adopted by the LPA, then it is fundamental that the AAP makes it very clear that the 'residential-led' areas will be the priority location for new housing and that their potential will be optimised ahead of other areas.

Council's Response

- 2.1 Disagree. The Council will expect all developments outside of the proposed SIL, including where appropriate in the LIL, to contribute towards delivering new homes in Fish Island. The proportion of residential within new developments will vary depending on location.

Issue 3

The LPA suggests that its figures in relation to its target of "up to" 2,400/2,700/2,800 housing units (the figure varies through the AAP?) is based upon methodology developed by the GLA which assesses housing typology to estimate the potential capacity of the area. For the mid FI area, the AAP suggests a housing capacity in the region of 550-800 dwellings. This grossly under-estimates the capacity of the area, not only having regard to, the scale of the identified opportunity sites such as Neptune Wharf, Wick Lane and land/adj Formans, but also the central mid FI area that is identified for mixed-use including residential.

The Vision should identify that capacity has been identified for at least 2,800 units and that in collaboration with partner authorities, delivery agencies and importantly, landowners / developers; opportunities will be reviewed to identify addition capacity for growth and the infrastructure that may be necessary to support such.

Council's Response

- 3.1 The Core Strategy acknowledges a target of up 2,400 which is referenced in the Fish Island Area Action Plan, and the further work undertaken using the GLA methodology has identified a monitoring target up to 2,500. For clarity and consistency, reference to the target figures in the Fish Island Area Action Plan will be reviewed to ensure all reference to the monitoring target is 2,500.
- 3.2 This figure is a guideline to inform the preparation of the Area Action Plan and subsequent site specific discussions. It is not a constraint on development. The Council considers that there may be the potential for a higher number of homes across the AAP area but this will be subject to the detailed design of individual proposals and will be tested through the development management process. The AAP will be kept under continual review to consider the number of new homes and jobs coming forward and to assess any potential implications for supporting infrastructure.

Issue 4

We are concerned that the opportunity to deliver growth and infrastructure in Mid FI could be undermined by the suggestion within the AAP that Mid FI is a more constrained area with less opportunity. Whilst para 2.8 (and 6.3) refer to heritage-led regeneration in mid FI and 2.9 discusses employment development, there is no acknowledgement that a major proportion of Mid FI, as designated on Fig 2.1, is for residential-led development (a similar annotation to that suggested for North FI. The text throughout the AAP must be more accurate in describing the character and opportunity of Mid FI and in particular the 'residential-led' areas within it (see our suggested 4.3).

Council's Response

- 4.1 Agree. The Council recognises the need to provide further clarity on the land-use approach for the area identified as 'mix-used' and 'residential-led' regeneration in the supporting text. The following wording will be added to paragraph 4.18.

“Development within the mixed use area will be expected to provide a balance of residential, commercial, and other supporting uses to create a vibrant and diverse community. Residential-led development will be expected to provide predominately residential which can be complemented by other uses such as community and commercial.”

Issue 5

We suggest at, for example, 4.27/4.33 and policy 4.5 that the AAP needs to acknowledge that in relation to matters such as, for example, affordable housing, or other generic policy expectations that are integral to the viability considerations of a scheme; that the AAP should acknowledge that within a regeneration such as this, that there are a number of competing priorities and notably, significant requirements for new infrastructure (eg, new crossings and schools) and significant environmental enhancement and open space provision that must be assessed against other generic policy aspirations.

Council's Response

- 5.1 Noted. The Council will amend section 7 'Delivering the AAP' to provide clarification regarding the approach taken to ensure priorities and policies are delivered, alongside regarding viability and delivering infrastructure.

"The Council will take a proactive approach toward development when delivering the AAP such that it reflects the presumption in favour of sustainable development as set out in the National Planning Policy Framework. The Council will seek to balance the need for encouraging and promoting redevelopment in Fish Island with the requirement for contributions towards its priorities, as defined by the policies in the AAP and the Implementation Plan in Appendix 2".

Issue 6

The AAP should identify that it will review and assess the need for site / area specific obligations and their impact on viability when assessing other policy expectations. Such an approach is critical to ensuring that a viable approach to delivery of identified development opportunities and supporting infrastructure is secured.

Such an approach is entirely appropriate within an AAP where there are localised priorities unique to the area and/or sites.

Having regard to the unique character of the area and the issues identifies as priorities in the AP, we consider it essential that the AAP acknowledges that the impact of such requirements will be assessed as a material consideration in assessing the viability of a scheme; after all, the LPA implies in relation to, for example, its desire for a school on the Neptune site, that securing viable enabling development is the only way in which such infrastructure will be achieved.

Council's Response

- 6.1 Noted. The Council will amend section 7 'Delivering the AAP' to provide clarification regarding the approach taken to ensure priorities and policies are delivered, alongside regarding viability and delivering infrastructure.

"The Council will take a proactive approach toward development when delivering the AAP such that it reflects the presumption in favour of sustainable development as set out in the National Planning Policy Framework. The Council will seek to balance the need for encouraging and promoting redevelopment in Fish Island with the requirement for contributions towards its priorities, as defined by the policies in the AAP and the Implementation Plan in Appendix 2".