

Mr Philip Wadsworth
Planning Policy
London Borough of Tower Hamlets
By email only

3 May 2018

Dear Mr Wadsworth

Examination of the London Borough of Tower Hamlets Local Plan

I have now undertaken an initial review of the documents and the supporting evidence submitted in relation to the plan. This letter sets out a number of matters upon which I would be grateful for clarification on from the Council.

Housing Delivery and Infrastructure Provision

I have reviewed the Infrastructure Delivery Plan (IDP) [SED06] and the infrastructure requirements as identified by the five year land supply and housing trajectory. There appear to be a number of discrepancies in connection with the proposed delivery trajectory for housing when compared to the infrastructure requirements.

I note the general commentary regarding health care provision which advises that until 2021, existing provision is 'nearly' able to accommodate the current demand for these facilities (para 5.2, page 47). What precisely does this mean in practical terms?. How does this statement relate to table 13 on page 47 of the IDP? I would be grateful for clarification on this issue from the Council.

Similarly, there is no timeframe specified on the open space strategy list of projects identified to help meet the need for open space (table 32). This is the same for the community centre provision (table 38). This is despite a number of these facilities being included within the site allocations proposed. I would again be grateful for a clear explanation of the approach adopted by the Council in relation to these infrastructure requirements.

In terms of education provision, I note the evidence base documents which have been submitted in this regard, including the Spatial Assessment Need for Schools (2018) [SED72] as well as the Site Allocations Methodology (2017) [SED64]. My understanding of the approach the Council is adopting is the over allocation of sites for both primary and secondary schools. As matters stand, from the Site Allocations Methodology (2018) [SED64], there is a requirement for 6 primary schools and 9 sites are allocated, and a requirement for 4 secondary schools and 5 sites are allocated. As far as I can see, the reasons for this approach are set out at paragraph 3.1 of document SED72 and include concerns regarding delivery constraints and timing in connection with the sites proposed, site capacity and potential air quality considerations which may make an allocated site incapable of delivering a school. Could you confirm if my understating of this issue is correct?

If this is correct, is the approach deliverable? I note that this position is disputed by a number of representors and concerns have been expressed regarding the ability of a number of the sites to accommodate the school provision envisaged. Does this issue require a more clear and focused

approach? Precisely how does this approach relate to the viability work which has been carried out and contained within document SED72 and moreover the advice contained with paragraphs 173 and 177 of the NPPF? At this stage, I am not sufficiently clear as to how the Council envisages this working in practical terms in the context of the housing delivery indicated by the trajectory. In addition, I note the Council has stated that further work is being carried out in relation to school provision and the site allocations¹ – what specifically does this work involve and when will it be available? I ask the Council to prepare a concise statement clearly explaining the position on all of this. I may well have further questions on this matter as part of the hearing sessions.

It is necessary for me to fully understand the infrastructure requirements in the context of the housing delivery over the plan period. To this end, please could the Council produce a detailed infrastructure phasing plan. This should include the following information:

- Review the sites included within the housing trajectory (including the site allocation reference numbers where relevant), you will see below I have identified how this should be presented;
- Identify **all** of the infrastructure requirements on a site by site basis – this should be broken down to the following time periods 2017/2018, 2018/2019, 2019/2020, 2020/ 2021, 2021/2022 and then at 5 yearly intervals for the remaining plan period. For the avoidance of doubt this should cover all of the infrastructure requirements identified within the IDP at sections 3-20 inclusive;

Submission document SED27 - Five Year Housing Land Supply and Housing Trajectory Statement (2018)

Section 6 of the report states that appendix C provides the full list of sites contributing towards the five year housing supply. I have reviewed this document and the information at appendix C in terms of the sites contributing to the five year supply and there are a number of inconsistencies. Most notably, when the information presented here is cross referenced with appendix A, the number of homes to be delivered does not tally. For example Wood Wharf refers to 1379 units to be delivered by February 2021 yet appendix C shows 1764 homes? Similarly appendix A states 846 new homes for Goodmans Fields yet appendix C only records 485 units. These are just two examples. I would be grateful for the Council's view on this. Please could you also ensure there is consistency in the naming of the sites, and that the site allocation numbers from the Local Plan are used, for the avoidance of any doubt. In order to address this issue, please could appendix C be reproduced as a gantt chart with additional columns showing the:

- overall site capacity;
- remaining units to be built (this will make it clear if units have already been completed and therefore taken account of in terms of supply) ;
- number of units that will be delivered across each year: 2017/2018, 2018/2019, 2019/2020, 2020/ 2021, 2021/2022; and

¹ As identified by the Council's response to representations

- total the table, at present the table has no overall total.

Appendix A covers 9 sites – does the Council have delivery information for the remaining site allocations as proposed by the Local Plan? This should be added to the trajectory so that a complete picture is provided.

Chapter 6- Revitalising our town centres, page 93

In relation to the Town Centre Retail Capacity Study (2016) [SED33], I note that the version provided is marked ‘final draft report’. Is this the correct version? Does this document support the retail floorspace requirements identified in Policy S.TC1 and table 4 of the Local Plan? If so, I ask the Council to explain where and how?

Part 4 – Delivering Sustainable Places, page 175

The plan states that this section sets out how each of the four sub areas will grow and change over the period to 2031. The text goes onto note that a number of allocations are included within each of the sub areas identified to accommodate new homes and jobs. There appears to be inconsistency between the housing numbers identified at paragraph 2.4, 3.4, 4.5 and 5.5 and those represented at table 1 page 62. I have summarised the differences below:

| Sub area | Figure from table 1 page 62 | Part 4 policy minimum figures |
|-----------------------------|------------------------------------|--------------------------------------|
| Isle of Dogs & South Poplar | 29848 | 30601 |
| City Fringe | 9330 | 10083 |
| Lower Lea Valley | 5395 | 6148 |
| Central Area | 6671 | 7624 |

I am assuming the differences relate to the application of the windfall allowance of 753 units for each sub area. This being the case, what is the justification for the central area windfall allowance of 953 units? This conflicts with the information presented on page 311 of the plan. In addition, the figures contained within table 1 at page 62 do not equate to the total as presented – these figures total 54254 and not 54455. I would be grateful if the Council could provide clarification on these points and clearly explain the discrepancies.

Turning to consider appendix 7: Housing Trajectory (page 309) there appears to be a number of typographical errors within this table. As a general point, please could you check all the totals within this table. How does the Borough wide windfall allowance of 860 relate to the annual windfall allowance of 215 units referred to on page 310? The text on page 311 states “completed (2016/2017)*” and also “Borough wide windfall allowance**”. However, there appears to be no explanation of what the asterisks refer to. Please could you explain this. The table on page 309 does not appear complete in the 2026-2031 timeframe period as the totals do also not tally. Please can you explain.

As a general point, is it the Council's intention to produce any statements of common ground with other parties? If so, could the Council please confirm with whom and when such statements are likely to be completed. In particular, I note that the representations from the London Borough of Hackney refer to the preparation of a statement of common ground regarding Bishopsgate Goods Yard, but there may well be others.

Next steps

I ask that you provide me with a full response to the matters raised no later than 15 May 2018. If you are unable to meet this timetable please advise the programme officer directly. In the meantime, if you require clarification on any of the matters raised, I will be happy to elaborate.

Once I have your reply, I will then be in a position to set out the matters and issues which will form the focus of the examination. At that point I will formally confirm dates for the hearing sessions. I am aware that you have provided details of the Council's availability and I am grateful for this. When I publish my matters and issues paper, I will ask the Council to provide a written statement addressing each of them, and I will invite representors to also provide statements. I will also publish a guidance note alongside my matters and issues paper. This will explain more about the examination process and procedures, and will set out the detail, including the timescales and deadlines to be adhered to.

Please ensure a copy of this letter is placed on the examination website.

Yours sincerely

Christa Masters

Inspector