

# **Examination of the Tower Hamlets Local Plan**

## **London Borough of Tower Hamlets**

### **Response to Main Matter 11**

#### **Matter 11: Transport, Monitoring and Other Matters**

##### **Issue 11 – Does the LP set out a clear framework for monitoring the implementation of the policies? Does the LP adequately address transportation issues across the borough?**

###### **11.1 Is the approach to transportation matters justified and effective? Is the approach adopted accepted by Transport for London?**

11.1.1 Paragraph 182 of the National Planning Policy Framework (NPPF) sets out that for a plan to be justified, it “should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence”.

11.1.2 The Integrated Impact Assessment for the LP (SD6) sets out reasonable alternatives that were considered in relation to car and cycle parking standards (see page 59 and appendices J and K). The decision was taken to lower the maximum car parking standards from the Managing Development Development Plan Document, rather than maintaining them or increasing them to London Plan standards - this is justified by the need to reflect the borough’s relatively high level of public transport accessibility, and the level of parking stress, air pollution and highway congestion. The decision was taken to meet minimum cycle parking London Plan standards for all use classes except for those where the standards in the Managing Development Development Plan Document already met or exceeded the London Plan – this is justified by the need to encourage growth in cycling to correspond with tighter car parking standards in the borough.

11.1.3 The Integrated Impact Assessment also assessed the final transport policies in the LP (see appendix L) and found them to have, individually and cumulatively, a positive impact on many of the sustainability appraisal objectives, and no negative impacts on any of the objectives. This demonstrates that the policies represent an appropriate strategy for achieving the sustainability appraisal objectives, and one which is more appropriate than the reasonable alternative options.

11.1.4 The transport policies are also supported by a proportionate evidence base, which includes the following:

- Cycling Strategy (SED63)
- Water Space Study (SED43)
- Green Grid Study (SED42)
- Strategic Transport Assessment (SED61)
- Parking and Freight Study (SED62)

11.1.5 Paragraph 182 of the NPPF also sets out that for a plan to be effective, it “should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities”.

11.1.6 The transport policies in the LP relate to the requirements for individual developments as and when they come forward, and will therefore be delivered on a site-by-site basis. They are therefore deliverable over the plan period.

11.1.7 Paragraph 11.14 of the supporting text to policy S.TR1 recognises the need for effective cross-boundary working, and commits the borough to working with neighbouring boroughs, Transport for London, and other agencies, to achieve strategic interventions such as the delivery of the Elizabeth Line, improved bus and river services, and new pedestrian and cycle connections. The general approach to partnership working in relation to the LP is also set out in chapter 2 in section 5.

11.1.8 The borough has a good working relationship with Transport for London, and the approach to transport matters taken in the LP is supported by Transport for London. For more details on this matter, please see the letter of comfort from Transport for London (SC002) which confirms that Transport for London are supportive of the general approach taken to transport matters in the LP.

## **11.2 How will the effectiveness of the LP and its policies be measured and assessed?**

11.2.1 The methods of assessing the effectiveness of the LP are set out in chapter 6 in section 5 of the LP. A number of key monitoring indicators are set out for each policy topic area, along with targets against which to measure the effectiveness of the policy. The data for these indicators will be collected, analysed and presented in an Annual Monitoring Report, which will also indicate where policies are proving effective or otherwise.

11.2.2 The LP also sets out a number of triggers for a review of the plan. Some of these triggers relate to significant changes in regional or national planning policy, but others relate to economic or technological changes which would be noticeable in the monitoring of the indicators. For example, the economic downturn trigger may be noticed through the monitoring of indicators KMI1 (growth in homes and employment), KMI2 (community infrastructure levy and section 106 payments), KMI7 (net additional homes), KMI9 (affordable homes), KMI15 (net additional jobs) and KMI19 (town centre vacancy rates). The technological change trigger may also be identified through the monitoring of indicators KMI19 and KMI18 (proportion and number of town centre uses within all town centres), potentially demonstrating a continuing transition from high street to online retail.

11.2.3 Please note that some additional indicators have been proposed as post-submission minor modifications (as set out in minor modification references: PSMM 196, 199, 202, 204, 205, 207, 208, 209, and 211). Because these indicators relate directly to existing policies, they are felt to be minor modifications rather than major ones. These additional indicators will further assist in monitoring the effectiveness of the plan.

## **11.3 Will the mechanisms set out in Part 5 of the LP in relation to monitoring and delivery be effective? Should Part 5 of the LP include timescales to assist monitoring? Would this measure assist in being able to assess policy effectiveness?**

11.3.1 The monitoring and delivery mechanisms set out in section 5 of the LP are expected to be effective, in the sense that they can be implemented over the course of the plan period and account for effective joint working where relevant.

11.3.2 Chapter 2 of this section deals with partnership working, and directs the reader towards the borough's Statement of Community Involvement (SD10) to demonstrate how stakeholders will be consulted and included in the development process within the borough. A partially-refreshed version of the Statement of Community Involvement was adopted in September 2017. The second part of that refresh, focusing on development management practices, is currently being undertaken, and the fully refreshed Statement of Community Involvement is expected to be adopted in February 2019.

- 11.3.3 Chapter 4 of this section sets out how the necessary infrastructure to support the development and growth of the borough will be delivered, including funding mechanisms (section 106 agreements and community infrastructure levies) and working with partner organisations and other stakeholders to explore additional funding sources to maximise infrastructure delivery. More detail on infrastructure delivery is provided in the Infrastructure Delivery Plan (SD06) and in the individual site allocations in section 4 of the LP, and guidance to support the delivery of infrastructure through section 106 agreements and community infrastructure levy is set out in the Planning Obligations Supplementary Planning Document (SED8).
- 11.3.4 The Annual Monitoring Report will monitor the effectiveness and performance of the policies on an annual basis (examples of previous reports can be found on our website at [www.towerhamlets.gov.uk/lgnl/planningandbuildingcontrol/planningpolicyguidance/monitoringandprogramme](http://www.towerhamlets.gov.uk/lgnl/planningandbuildingcontrol/planningpolicyguidance/monitoringandprogramme)) which will track and measure the progress of the indicators against the targets set out in the monitoring and delivery framework (table 10) in section 5 of the LP. These indicators are, in all cases, linked to the intended aims of the policies in section 3 of the LP.
- 11.3.5 The monitoring and delivery framework also includes specific timescales to monitor the effectiveness of some of the indicators over different intervals of the plan period. These include:

KMI 7: Net additional homes in the monitoring year	The LP sets a target of delivering at least 3,931 new homes per year
KMI 8: Five-year housing land supply	The five year housing land supply will be updated and reviewed on an annual basis.
KMI27: Carbon dioxide emission reduction)	These indicators set out short, medium or long term targets based on the timescales set out in the London Plan.
KMI30: Waste management facilities	
KMI31: Household waste recycled	

- 11.3.6 Where monitoring indicators do not include specific timetables, this is because they are to be measured against a set target which is expected to be achieved each year, rather than being expected to improve year on year from a lower starting point. For example, in relation to indicator KMI3 on the number of designated heritage assets, it would not be appropriate to implement a timescale approach, as the target is simply to avoid the loss of any designated heritage assets in any year – the target is therefore identical in the first year of the plan to the final year of the plan. The majority of indicators included are of this type, where a timescale would be an inappropriate way of measuring effectiveness.
- 11.3.7 In terms of housing delivery, a 15-year timescale is provided (between 2016 and 2031) for each of the four sub-areas in the LP. This is felt to be an appropriate timescale for measuring the effectiveness of the plan in delivering housing, and allows for schemes to come forward at different times and at different paces in different parts of the borough, rather than assuming an arbitrarily uniform rate of delivery across the borough at all times. However, specific yearly targets will be included as a minor modification to indicator KMI1 (minor modification reference PSMM194) in order to enable identification of sub-areas where delivery is slower; the fifteen year targets for the sub-areas will also be explicitly included in the indicator target. In addition, other new indicators and targets have also been added to the monitoring and delivery framework (see the post submission minor modifications) to monitor the effectiveness of the plan in the interests of ensuring it is effective and capable of being delivered.
- 11.3.8 No representations were received on the monitoring of the LP, indicating that consultees felt the monitoring of the plan to be effective.