

## **London Borough of Tower Hamlets: Local Plan 2031**

### **Inspector's Matters and Issues for the Examination – Stage 1**

#### **Matter 2: Basis for the LP and Spatial Strategy**

Representations prepared by Lichfields on behalf of Aberfeldy New Village LLP

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**Issued** 27 July 2018

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#### **1.0 Introduction**

1.1 The following representation is made by Lichfields on behalf of Aberfeldy New Village LLP in relation to Matter 2: Basis for the Local Plan and Spatial Strategy; Issue 2. The question to be addressed is as follows:

##### **Question 2.2**

***Are the locations identified for development, namely the opportunity areas identified by policy S.SG1, the most appropriate locations when considered against all reasonable alternatives? What factors have influenced the distribution proposed? What role has the sustainability appraisal had in influencing the distribution of development?***

1.2 While it is recognised that paragraph 214 (Annex 1) of the 2018 NPPF clarifies that policies in the 2012 NPPF will apply for the purpose of examining plans where plans are submitted on or before 24 January 2019, this representation has made reference to the new guidance where applicable to reiterate the Government's position moving forward.

#### **2.0 Representations**

2.1 The Aberfeldy New Village lies within the Lower Lee Valley Opportunity of the adopted London Plan and Poplar Riverside Opportunity Area of the emerging London Plan (published December 2017). Opportunity Areas are expected to see the most significant change and are identified as having the potential to deliver a substantial amount of the new homes and jobs that London needs. Policy 2.13 of the London Plan states that they are a location where emphasis is placed on realising growth potential, by seeking to “... *optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses.*”

2.2 Emerging London Plan policy SD1 builds upon this and confirms the Mayor's commitment to support the regeneration of these areas through identifying a clear strategy for accommodating growth, assisting in the delivery of specific infrastructure to unlock capacity for new homes and jobs and ensuring Opportunity Areas contribute to regeneration objectives by tackling spatial inequalities and environmental, economic and social barriers that affect the lives of people in the area, especially in Local and Strategic Areas for Regeneration. Part B of Policy SD1 confirms Boroughs, through Development Plans and decisions, should “*clearly set out how they will encourage and deliver the growth potential of opportunity areas*”; “*support development which creates employment opportunities and housing choice for Londoners*”; and, “*... meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12*”. For Poplar Riverside Opportunity Area, these are given as 9,000 new homes and 3,000 new jobs in Figure 2.7.

- 2.3 Aberfeldy also lies within an Area for Regeneration (see adopted London Plan Policy 2.14) and a Strategic Regeneration Area (see emerging London Plan Policy SD10). Emerging policy SD10 reiterates the wording given in draft policy SD1 for these areas and states Development Plans, Opportunity Areas Planning Frameworks and development proposals should contribute to regeneration by tackling spatial inequalities and the environmental, economic and social barriers that affect the lives of people in the area, especially in Strategic and Local Areas for Regeneration.
- 2.4 Aberfeldy New Village LLP support Policy S.SG1 in so far as it is consistent with paragraph 14 of the 2012 NPPF and paragraph 11 of the 2018 NPPF, which emphasises a strong presumption in favour of sustainable development and a requirement for plan-making to positively seek opportunities to meet the development needs of their area.
- 2.5 In terms of the draft areas of growth and opportunity identified in the Local Plan, these are largely consistent with the Opportunity Areas identified in the adopted London Plan, however, appear to be marginally different from those in the emerging London Plan (the Poplar Riverside OA is not identified in the draft LBTH Local Plan). Being identified in the London Plan(s) as an area with significant growth potential, brings added strategic oversight benefits to the identified areas, particularly from the Mayor of London and will result in a coordinated approach to delivering new homes and jobs.
- 2.6 To be in accordance with the London Plan, LBTH is required to deliver 39,314 new dwellings over ten years between 2015 – 2025 which annualised is 3,931 new homes per year (this has decreased to 35,110 or 3,511 in the draft London Plan). LBTH have rolled forward its annual target to cover the entire plan period which results in a housing supply target for the borough of 58,965 new dwellings.
- 2.7 In terms of the Lower Lea Valley OA, the draft Local Plan states this area is required to deliver a minimum of 5,395 dwellings, along with office, industrial and retail, leisure and infrastructure floorspace. Table 1 on page 62 confirms 5,395 dwellings is a minimum target and that it represents approximately 11% of the LBTH housing supply target.
- 2.8 While Aberfeldy New Villages LLP agree with the Council's broad approach to housing delivery, it is considered that the Plan is unsound as it is neither positively prepared or effective as the Council are not seeking to fully maximise the delivery of housing in these locations.
- 2.9 The spatial strategy makes no reference to the strong emphasis that should be given to making the most efficient and effective use of previously-developed or 'brownfield' land as set out in paragraph 117 of the 2018 NPPF.
- 2.10 Policy S.SG1 does not set out a clear strategy for accommodating LBTH's objectively assessed housing need. For instance, within the Lower Lea Valley OA, the Council have only allocated two sites, which have a combined potential to deliver 2,346 new homes. This leaves a shortfall of 3,049 dwellings.
- 2.11 Aberfeldy New Village LLP requests that the Policy is more positively worded to include a commitment in Policy S.SG1 (clarified in chapter 4 - sub-area 3: Lower Lea Valley) for development proposals to fully optimise the quantum of residential development on sites in the OA (subject to design, townscape and amenity considerations) and, importantly, to seek to significantly increase density in redevelopment and regeneration proposals. It should be made clear that every effort should be made to make the most of all land within the Opportunity Areas to significantly increase the supply and delivery of new homes. Without this, the Local Plan will fail to deliver the housing requirement.

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