

Transport for London Commercial Development

Tower Hamlets Local Plan
Examination in Public 2018:

Response to Matter 1
General Matters and
Legal Requirements



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Transport for London (Commercial Development): Response to Matter 1: General Matters and Legal Requirements

Introduction

Please note that these representations set out the views of Transport for London Commercial Development (TfL CD) in its capacity as a local landowner and do not form part of TfL's response as a statutory consultee or transport operator.

Our colleagues in TfL Spatial Planning have provided separate representations throughout the London Borough of Tower Hamlets (LBTH) local plan preparation process in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

TfL Commercial Development (CD) Objectives

TfL CD has been set an ambitious target by the Mayor of London to commence the development of 10,000 new homes in London by 2021 with the target that at least 50% of these new homes must be genuinely affordable. To meet these objectives, TfL CD has identified sites across London that have capacity to accommodate residential development, including several key opportunities in Tower Hamlets.

TfL CD operates with the five key drivers set out below to ensure that all development meets the objectives of the organisation:

- 1. Deliver Homes and Jobs**
- 2. Serve the Community**
- 3. Create Great Places**
- 4. Provide a Good Customer Experience**
- 5. Generate Sustainable Revenue**

The Mayor's Transport Strategy sets out transport objectives for TfL. At the heart of the strategy are three key themes:

1. Healthy Streets and Healthy People

Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.

2. A good Public Transport Experience

Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport could dramatically reduce the number of vehicles on London's streets.

3. New Homes and Jobs

More people than ever want to live and work in London. Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone.

TfL CD has engaged with Tower Hamlets throughout the Local Plan preparation process, identifying the suitability of the Aspen Way site allocation (site allocation 4.1 in the Local Plan) for high quality development.

TfL CD believes that on this site a development can be provided which achieves TfL's five key development drivers and transport objectives, providing significant benefits to Poplar and the wider borough. The development will provide new walking and cycling links to overcome the severance between Poplar and Canary Wharf caused by the Docklands Light Railway (DLR) depot and Aspen Way, linking a deprived ward with one of the largest employment centres in England and helping to achieve key objectives within the Local Plan. It will also enable the retention and expansion of the existing DLR depot which is critical to increasing future capacity on the DLR as it will house new rolling stock for the line.

The Aspen Way site allocation is located within the Isle of Dogs and South Poplar Opportunity Area. The site will have a Public Transport Accessibility Level (PTAL) rating of 6A by 2031 due to the opening of the Elizabeth Line station in close proximity to the development and planned infrastructure improvements to better link South Poplar to Canary Wharf. These factors mean that the site is suitable for the optimisation of residential development in line with London Plan Policy.

1.0 Matter 1: General Matters and Legal Requirements

Question 1.5 Has the Local Plan been prepared to be in general conformity with the London Plan?

- 1.1 The Site Allocation for Aspen Way set out on page 224 – 226 of the Local Plan is not in conformity with the London Plan or the Draft London Plan.
- 1.2 London Plan Policy 3.4 (Optimising Housing Potential) states *“that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2.”*¹ In line with the London Plan policy, the Aspen Way Site allocations character ranges from *“urban”* to the north of the site adjacent to Poplar to *“central”* to the south of the site which borders Aspen Way. The international centre of Canary Wharf is within 800m of the site to the south and the district centre of Poplar High Street is within 800m to the north of the site.
- 1.3 The site’s location and high level of accessibility means it is suitable for the optimisation of housing density including the provision of high quality development in the form of tall buildings. However, this is not recognised within the site allocation which states that the site should *“respond positively to the existing character, scale height, massing and urban grain of the surrounding built environment.”* In our view the allocation should also recognise the potential for the optimisation of residential development in line with London Plan Policy 3.4.
- 1.4 The site falls within the Isle of Dogs and South Poplar Opportunity Area. Paragraph 2.62 of the London Plan identifies that in opportunity areas the *“scope for larger areas to determine their own character should be fully realised in terms of housing densities, including those towards the top of the relevant density scale where appropriate.”*²
- 1.5 Draft London Plan policies D1 (London’s Form and Characteristics), and H1 (Increasing housing supply) support the optimisation of residential density on development sites. Policy D6 (Optimising Housing Density) states that the design of the development: *“must optimise housing density. A design-led approach to optimising density should be based on an evaluation of the site’s attributes, its surrounding context and capacity for growth and the most appropriate development form, which are determined by following the process set out in Policy D2 Delivering good design.”*³
- 1.6 The site will have a future PTAL rating of 6A by 2031 due to the opening of the Elizabeth Line station at North Dock in close proximity to the site and planned infrastructure improvements to better link the Docklands Light Railway (DLR) station and Poplar to Canary Wharf.⁴ The existing DLR depot on the site will also be expanded to house new rolling stock in order to increase capacity on the DLR. It’s

¹ Greater London Authority (2016) The London Plan

² Ibid

³ Greater London Authority (2017) The Draft London Plan 2017

⁴ Great London Authority (2018) PTAL Map 2031

part-central part-urban character and location within an Opportunity Area means that residential densities should be optimised on the site. Utilising the Density Matrix set out in Policy 3.4 London Plan an indicative residential density for the site is between 260 and 460+ units per hectare. Draft London Plan Policy D6 “optimising housing density” identifies that a design led approach should be taken to assessing residential density and that high quality schemes should optimise density on development sites.

- 1.7 The need to optimise residential densities on the site due to its high level of connectivity, urban and central character and location within an Opportunity Area is not recognised within the Aspen Way site allocation. No indicative level of housing provision has been provided within the site allocation document and site allocation methodology document identifies that the site is suitable for the provision for 500+ units. The allocation is not compliant with London Plan Policy and should be altered to reflect that the site is suitable for the optimisation of residential development.
- 1.8 London Plan Policy 7.7 (Location and Design of Tall Buildings) identifies *that “Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks”*. The policy further identifies that *“Tall and large buildings should “generally be limited to sites in the Central Activity Zone, Opportunity Areas, areas of intensification or town centres that have good access to public transport”⁵*
- 1.9 Draft London Plan Policy D8 (Tall Buildings) also supports the delivery of tall buildings within opportunity areas and areas with high levels of public transport connectivity.
- 1.10 The Aspen Way Site allocation is precluded from supporting tall buildings in the Local Plan as it is not located within the Blackwall Tall Buildings Cluster set out in policy D.DH6 (Tall Buildings) of the Local Plan (P49). The site is located within an opportunity area and with the Central Activity Zone and has strong access to public transport links and therefore should be considered suitable for tall buildings. This is not reflected in Policy D.DH6 of the Local Plan or within the Aspen Way site allocation. Representations to Matter 8: “Heritage, Design and Tall Buildings” have been produced by Peter Stewart Consultancy on behalf of Transport for London Commercial Development and provide further evidence as to why the Aspen Way site allocation is suitable for tall buildings and should be included within the Blackwall Tall buildings cluster identified in Local Plan policy D.DH6.
- 1.11 There is no indication that London Borough Tower Hamlets (LBTH) has worked with the Mayor to consider whether the Aspen Way site allocation is suitable for tall buildings. The draft Isle of Dogs and South Poplar Opportunity Area Planning Framework (OAPF) produced by the GLA and is currently in its consultation stage. The draft document indicates a direction of travel and provides site specific guidance for development bear in mind when drawing up development proposals in

⁵ Greater London Authority (2016) The London Plan

the Opportunity Area. The draft OAPF is supplementary guidance to the London Plan and carries material weight in planning decisions.

- 1.12 The draft OAPF identifies that areas of the Aspen Way site allocation is suitable for “*predominantly high rise, mix use development and that development on the Aspen Way site should transition in scale and character from Poplar to the large floor plan office blocks of Canary Wharf.*” The wording of the draft OAPF policy is not reflected in the Aspen Way site allocation or Policy D.DH6 (Tall Buildings) of the local plan. These policies are therefore not compliant with the draft OAPF or the London Plan.

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