

# Transport for London Commercial Development

Tower Hamlets Local Plan  
Examination in Public 2018:

Response to Matter 2  
Basis for the Local Plan  
and Spatial Strategy



## **Tower Hamlets Local Plan Examination in Public 2018**

### **Transport for London (Commercial Development) Response to Matter 2: Basis for the Local Plan and Spatial Strategy 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 2: Basis for the Local Plan and Spatial Strategy

### Question 2.1: Does the LP provide a clear, positively prepared and justified vision for the borough?

- 1.1 The Aspen Way Site Allocation (P224-226) of the Local Plan does not provide a clear, positively prepared and justified vision for the borough.
- 1.2 Key objective 1 of the Local Plan “Managing the growth and shaping change”, identifies that *“growth must be delivered alongside social and transport infrastructure, recognising that without the provision of adequate infrastructure growth cannot be supported.”* Key objective 2 “Sharing the benefits of growth” identifies that growth should ensure the *“accessibility of spaces, places and facilities.”* Specifically this refers to one of the most challenging issues facing the borough, namely the severance of Canary Wharf from the communities to the north and the social and economic need to improve the linkages.
- 1.3 In line with these key objectives, Policy D.DH2 “Attractive streets, spaces and public realm” and Part 4 Delivering Sustainable Places (point 19) of the Local Plan identifies the severance caused by Aspen Way and the DLR tracks and depot the separation of Canary Wharf/the Isle of Dogs from the rest of Tower Hamlets as a critical issue for the Borough.
- 1.4 Despite accommodating one of the country’s major employment centres in Canary Wharf (which is part of the London Central Activities Zone and employs over 105,000 people), the Borough of Tower Hamlets has the fourth highest level of employment deprivation in London with 13.8% per cent of the Borough’s working age population *“involuntarily excluded’ from the labour market.”*<sup>1</sup> This is higher than the national average of 12%.<sup>2</sup> The Poplar Ward, despite being close to Canary Wharf, has higher employment deprivation than the borough average with 15.9% of the working age population in employment deprivation compared to the borough average of 13.8%.<sup>3</sup>
- 1.5 The Local Plan and draft Isle of Dogs and South Poplar Opportunity Area Planning Framework (OAPF) both recognise that linking and improving access to the employment opportunities in Canary Wharf to the rest of the borough is one of the most challenging issues facing the borough. Canary Wharf’s location on the Isle of Dogs peninsula means that it is most practical for Tower Hamlets residents to access the area from the north. However, the severance caused by Aspen Way and the location of the DLR tracks and depot prevents Canary Wharf being easily accessed from Poplar and the rest of Tower Hamlets.
- 1.6 The development of the Aspen Way site allocation is the only way that this severance can be overcome. The site allocation identifies that significant infrastructure should be provided on the site including decking and bridging over Aspen Way and the DLR depot to overcome severance. However, the site allocation does not recognise the full extent of the constraints facing the site:

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<sup>1</sup> London Borough of Tower Hamlets (2015) Analysis of the 2015 Indices of deprivation

<sup>2</sup> Ibid

<sup>3</sup> Ibid



- The operational DLR depot on the site needs to be retained and expanded as part of development as it is critical to the future operation of the DLR. The expanded depot will house future DLR rolling stock and the secondary computer systems required to run the line will need to be retained. The need to retain and expand an operational DLR depot will require a deck to be provided on the site will add significant cost to any development.
- The allocation fails to mention the significant level changes on the site. From Aspen Way at the South of the to the Northern Border of the site in South Poplar the ground level increase by approximately 10 meters. This will further increase the challenges of providing development on the site and providing links across the Depot and Aspen way to site to the overcome severance.

1.7 Development on the site is reliant on the provision of a deck and transfer slab over an enlarged depot and bridge links over Aspen Way. The deck will need to be as high as the 6 storey apartment blocks which characterise South Poplar to the north of the site, in order to be able incorporate an expanded depot and bridge links over Aspen Way. Any development on the site will need to take place on top of this deck, making it even the ground floors of new development significantly taller than the surrounding buildings to the north of the site.

1.8 The site allocation identifies that development should provide significant and costly infrastructure such as bridge links across Aspen Way and decking over the DLR depot. To fund the delivery of this infrastructure, high quality development on the form of tall buildings will need to be provided. Furthermore, the requirement for with 1 hectare of open space restricts the footprint of achievable built development and provides further justification for tall buildings on the site in order for development to be viable and deliver the required infrastructure.

1.9 The draft Isle of Dogs and South Poplar OAPF recognises that the development of the Aspen Way Tower Hamlets Site Allocation should provide "*a new attractive and vibrant place within the area.*"<sup>4</sup> (P47) To fund the delivery of infrastructure the character of this new attractive and vibrant place will need significantly differ from, but complement, South Poplar and providing high quality development in the form of tall buildings.

1.10 To ensure that the Aspen Way site allocation is clear, positively prepared and justified, it should be amended to recognise the level changes and decking required on the site will mean that any development on the site will be significantly higher than the 3-5 storey blocks in South Poplar. To ensure that the benefits of infrastructure provision including links over Aspen way are realised the site allocation should also recognise that high quality development at the appropriate density in the form of the tall buildings are required to fund delivery and achieve strategic objectives.

1.11 If the site allocation is not amended to identify that the site is suitable for tall buildings, the strategic objective of overcoming severance between Canary Wharf and South Poplar will not be achieved. The recent experience at Old Oak Elizabeth Line depot where the failure to future proof development design by ensuring that funding was provided for decking that can withstand residential development has meant development cannot come forward adjacent to what is to be London's second largest station. This has created severance in the Old Oak area and an

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<sup>4</sup> Greater London Authority (2018) Draft Isle of Dogs and South Poplar Opportunity Area Planning Framework

ongoing barrier to development which cannot be overcome in the short term due to high price of retrofitting a deck.

- 1.12 TfL CD are in the process of designing a viable development plan for the site which will achieve strategic objectives and overcome severance between Canary Wharf and South Poplar. However, the Aspen Way site allocation should be amended to be clear, positively prepared and justified, recognising the constraints on the site and that tall buildings will need to be provided alongside infrastructure to achieve strategic objectives.

**Question 2.3: How have issues concerning viability been addressed, in order to ensure that there is a reasonable prospect that the sites identified will come forward for development during the plan period? Please provide a clear explanation as to what methodology has been used to assess viability.**

- 1.13 Issues concerning viability for the Aspen Way site allocation have not been addressed and no methodology has been used to assess viability.
- 1.14 The Tower Hamlets Site Allocation Methodology Supporting Evidence Document (2018) identifies that: *“The council has allocated 21 sites and selected 14 sites to viability test.”*<sup>5</sup> The document identifies that no viability assessment has been carried out on the Aspen Way site allocation. The justification for not assessing viability is given in the document is that the site is owned by *“Transport for London and it is difficult to establish cost burdens.”*<sup>6</sup>
- 1.15 National Planning Policy Framework paragraph 159 identifies that local authorities should prepare a Strategic Housing Land Availability Assessment *“to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.”* LBTH evidence identifies that they have not assessed the economic viability of the Aspen Way site allocation in the Local Plan, the Site Allocation Methodology Document, the Five Year Housing Land Supply document or the London Strategic Housing Land Availability Assessment document.
- 1.16 TfL CD has carried out initial feasibility studies which identify that a viable development can come forward on the site provided. However, to meet the requirements of open space, level changes, decking over an expanded DLR depot and bridging Aspen way the development will need to be in the form of high quality tall buildings.

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<sup>5</sup> London Borough Tower Hamlets (2018) Site Allocation Methodology Document

<sup>6</sup> Ibid

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