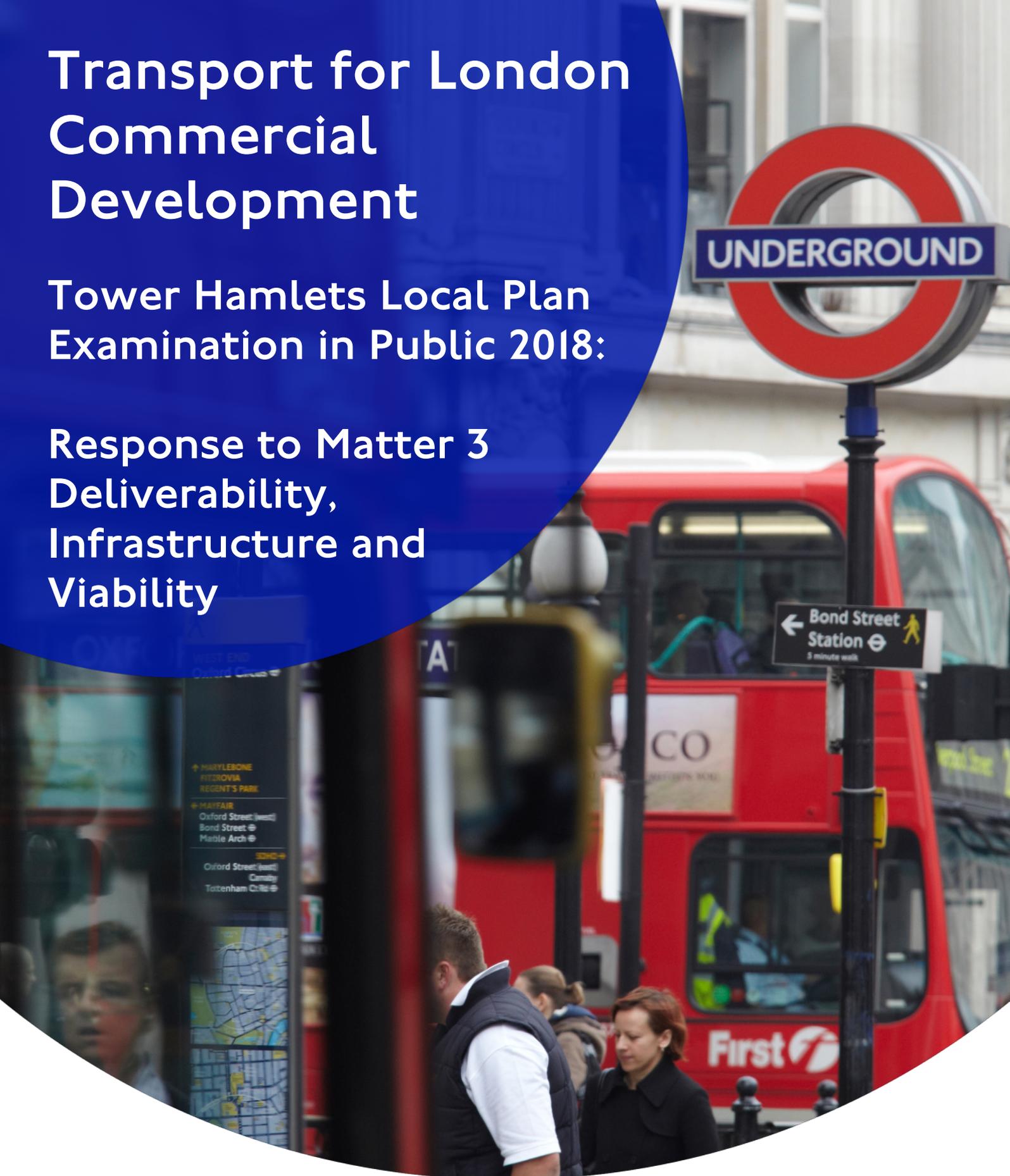


Transport for London Commercial Development

Tower Hamlets Local Plan
Examination in Public 2018:

Response to Matter 3
Deliverability,
Infrastructure and
Viability



Tower Hamlets Local Plan Examination in Public 2018

Transport for London (Commercial Development): Response to Matter 3 Deliverability Viability And Infrastructure

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 3: Deliverability, Infrastructure and Viability.

Question 3.1: Does the evidence base support the site allocations proposed and demonstrate that they are viable and deliverable, having regard to all of the policies contained within the Local Plan?

- 1.1 The Local Plan's current wording and evidence base does not demonstrate that the Aspen Way site allocation is viable and deliverable. The Aspen Way site allocation provides no information on viability and 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.*" 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.*"
- 1.2 Despite not providing any viability assessment for the site, the site allocation identifies a list of infrastructure requirements that should be provided as part of any development. The allocation states that the development will be expected to:
- *Provide Strategic Open Space (1 hectare)*
 - *Re-provide the college*
 - *Re-provide a community centre and associated football pitches*
 - *Address the physical barriers created by Aspen Way with new and improved walking and cycling routes. This could be facilitated by the provision of new bridges or decking across Aspen Way connecting the site to Billingsgate market;*
 - *Development should create a positive sense of place with a public square and public green open space;*
 - *Development should enable continued use of the depot;*
 - *Development should not undermine the delivery of long term aspiration for new bridges and or decking over Aspen Way.*
- 1.3 Further to this, affordable housing will also be provided on the site at a minimum of 35% in line with TfL objectives. The cost of delivering the necessary infrastructure on the site that is identified in the site allocation alone is substantial. This cost is coupled with the provision of a deck and transfer slab over an expanded DLR depot which will be built to withstand residential development over the top of it. Providing connections over the DLR depot Aspen Way to overcome severance are essential in ensuring development meets the key objectives of the local plan. The site allocation also does not take in to account the significant level change on the site. This level change is shown in the drawings submitted alongside the TfL Commercial Development response to Matter 8 which has been prepared by Peter Stewart Consultancy. This level change will further increase the cost of providing any development on the site.

- 1.4 The initial feasibility study carried out by TfL has found that the significant costs of providing necessary infrastructure will impact upon the viability of development on this site. A significant quantum of residential development will need to be provided on the site to fund delivery of this strategic infrastructure.
- 1.5 Currently the site allocation does not reflect the possible requirement for tall buildings. Policy D.DH6 “Tall Buildings” does not include the Aspen Way site allocation within the Blackwall tall buildings cluster. The allocation should be amended to ensure that policy recognises that development may have to take the form of tall buildings and this means the site should be incorporated into the Blackwall tall buildings cluster. Peter Stewart Consultancy have provided representations on matter 8: Heritage, Design and Tall Buildings behalf of TfL CD which provides evidence to justify the expansion of the Blackwall tall buildings cluster to include the Aspen Way site allocation and it is his view that this is a logical and appropriate expansion.

Question 3.2: Are the viability assessments contained within Tower Hamlets Local Plan Viability Assessment 2018 (SED5) sufficiently robust and are they based on reasonable assumptions? Is the housing set out in Policy S.H1, and are the housing sites proposed as part of the Site Allocations financially viable? In particular:

Do the viability assessments adequately reflect the nature and circumstances of the proposed allocations?

- 1.6 As identified in the response to matter 3.1 no viability assessment has been carried out on the Aspen Way site allocation therefore the Local Plan does not reflect the nature and circumstances of the proposed site allocation. The justification for not carrying out a viability assessment is that the cost burdens of the infrastructure identified will need to be provided by TfL. Furthermore, it is clear that the development itself must fund a substantial element of this.

Has the cost of the full range of expected requirements on new housing been taken into account, including those arising through policy requirements identified by the LP (for example, in relation to affordable housing)?

- 1.7 No viability assessment that considers the impacts of infrastructure and housing requirements on the Aspen Way site allocation has been carried out by LBTH. TfL CD has carried out initial feasibility studies which identify that a viable scheme which provides key infrastructure including a deck over the depot and a bridge link over Aspen Way can be delivered on the site along side the provision of mixed use development that will be in the form of tall buildings.

Does the evidence base demonstrate that such costs would not threaten the delivery of the housing planned for?

- 1.8 The site allocation for Aspen Way sets out significant and complex infrastructure requirements identified in the response to matter 3.1 above. To make the delivery of

such complex infrastructure viable it is likely that a significant quantum of residential development in the form of tall buildings will be required on the site. The evidence base for the Aspen Way site allocation provides no analysis of costs to deliver infrastructure and therefore it cannot be assessed whether the costs would threaten the delivery of the housing planned for.

- 1.9 **Question 3.3: Is there robust evidence to demonstrate that all of the necessary infrastructure to support the level of growth proposed can be provided in accordance with the timetable identified? This includes all infrastructure including health care, education, transport, open space. In particular:**

What are the key infrastructure requirements for the successful delivery of the housing planned?

- 1.10 Site Allocation 4.1 Aspen Way identifies that the development should provide the following infrastructure:

- *Provide Strategic Open Space (1 hectare)*
- *Re-provide the college*
- *Re-provide a community centre and associated football pitches*
- *Address the physical barriers created by Aspen Way with new and improved walking and cycling routes. This could be facilitated by the provision of new bridges or decking across Aspen Way connecting the site to Billingsgate market;*
- *Development should create a positive sense of place with a public square and public green open space;*
- *Development should enable continued use of the depot;*
- *Development should not undermine the delivery of long term aspiration for new bridges and or decking over Aspen Way.*

What reassurances are there that these elements can and will be delivered when and where they are needed?

- 1.11 No viability assessment has been carried out on this site. The current site allocation is not clear or positive in identifying that significant quantum of residential development will be required to fund the delivery of necessary infrastructure on the site. It is important that policy identifies the site as suitable for the provision of high quality development in the form of tall buildings to ensure that development and the provision of desired infrastructure takes place. The Blackwall tall buildings cluster should be extended west to incorporate the Aspen Way site allocation. There is no reassurance that the necessary infrastructure can be delivered on this site without alterations to policy to promote the provision of a significant quantum of development to fund delivery.

Has the cost of these infrastructure elements been estimated, and funding sources identified?

- 1.12 Although the Local Plan has identified the types of infrastructure required to make the Aspen Way site allocation deliverable, LBTH has not estimated any costs or funding sources for the site. The Draft Isle of Dogs and South Poplar Development Infrastructure Funding Study (produced by Peter Brett Associates as part of the evidence base for the draft OAPF) identifies that Decking and Bridging over Aspen Way is a high risk project and is significantly expensive to deliver (£37,950,000). There is need for a substantial development on the site to ensure that complex infrastructure can be funded. A recent similar development includes the provision of a bridge link over the North Circular to link Cricklewood to Brent Cross shopping centre has a price of £20 million and it is likely that the provision of any bridge link over Aspen way would carry a similar cost.

In what way do the policies provide a clear and effective framework for securing the necessary infrastructure or other obligations to mitigate the effects of, or support development?

- 1.13 TfL CD share the LBTH vision of the infrastructure required to make the Aspen Way site allocation deliverable. However, to fund this infrastructure, a significant quantum of development will need to be delivered on the site. The site is not currently identified as being suitable for the provision of tall buildings and without this allocation it is unlikely that the site and associated infrastructure come forward within the plan period.

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