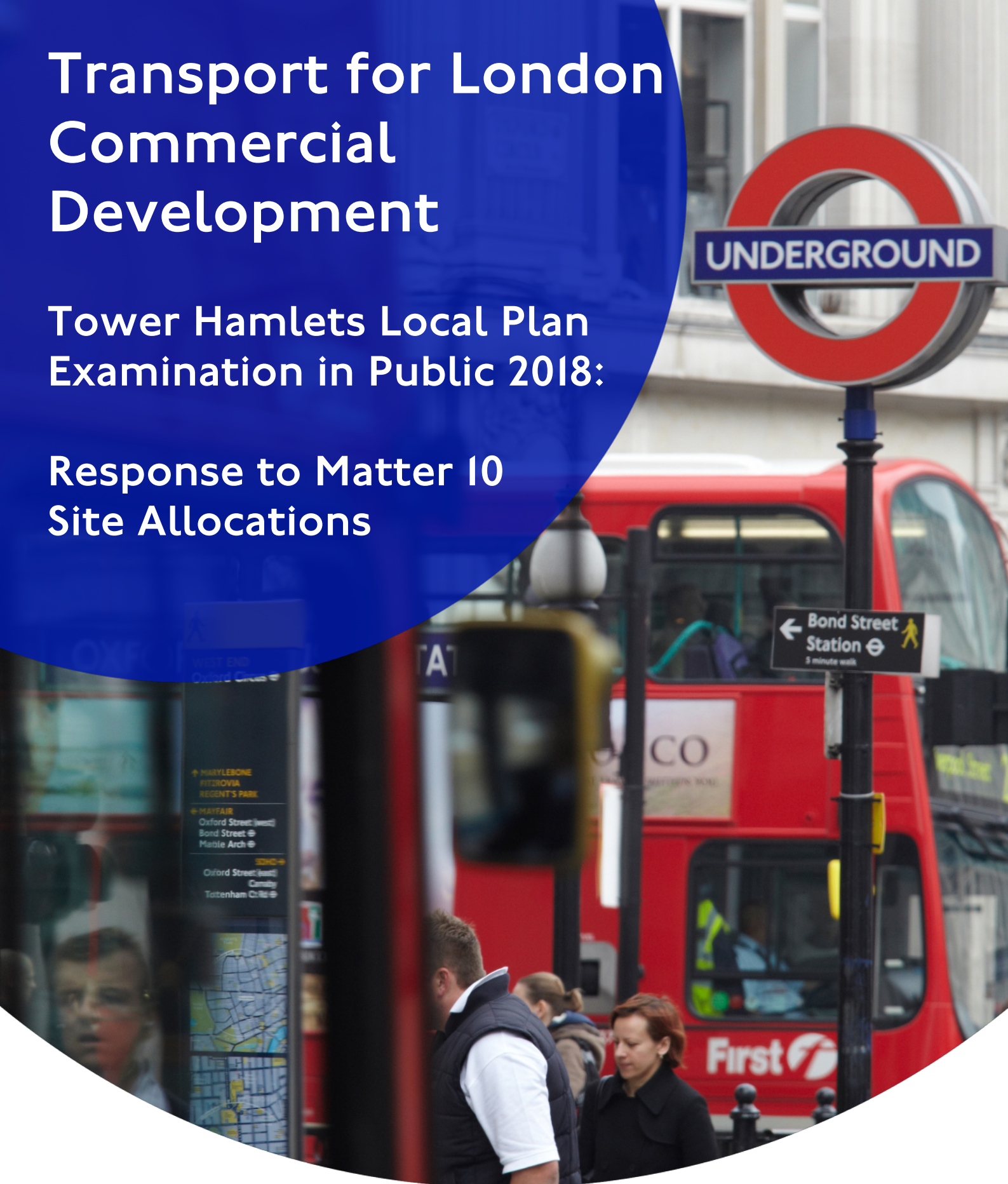


Transport for London Commercial Development

Tower Hamlets Local Plan
Examination in Public 2018:

Response to Matter 10
Site Allocations



Tower Hamlets Local Plan Examination in Public 2018

Transport for London (Commercial Development): Response to Matter 10 Site Allocations

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 10: Site Allocations

In relation to all of the proposed site allocations contained within City Fringe, Central, Lower Lea Valley, Isle of Dogs and South Poplar:

Are the criteria in the allocations policies necessary, relevant and deliverable?

- 1.1 The site allocation does not give an indication of the density and building form considered suitable for the Aspen Way site allocation. Given the costs of delivering the significant infrastructure that is identified within the site allocation, deliverability of the Aspen Way site is dependent on the provision of high quality mixed use development possibly in the form of tall buildings. This should be made clear within the design principles criteria assessing the Aspen Way site allocation.

Is the allocation justified by the evidence base?

- 1.2 The local plan does not provide a viability assessment or estimate the costs of delivering the infrastructure required on the Aspen Way site. The justification of not assessing viability is that it is difficult to assess the cost burdens of development. To fund the delivery of such infrastructure and achieve connectivity objectives set out in the Local Plan, substantially more development should be provided on the site in the form of high quality mixed use development inclusive of taller buildings. The site is not identified as being suitable for tall buildings with policy D.DH6 or within the wording of the site allocation and this will need to be altered to justify the delivery of complex infrastructure on the site.

Is the extent of each site correctly identified?

- 1.3 The extent of the Aspen Way site allocation is correctly identified.

Are the detailed requirements for each site clear and justified?

- 1.4 The detailed infrastructure requirements for the Aspen Way site allocation are justified and TfL CD supports their delivery. However, feasibility studies carried out by TfL CD have shown that the infrastructure requirements on the site can only be delivered alongside high quality mixed use development in the form of tall buildings. No LBTH viability assessment has been carried out on the site and the wording of the site allocation and policy D.DH6 should be amended to reflect the need for a significant quantum of development to fund the delivery of infrastructure on the site.

Are the allocated sites deliverable?:

- 1.5 No viability assessment has been produced by LBTH for the Aspen Way site allocation. 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.*

1.6 In addition to these infrastructure requirements, TfL will need to provide an expanded depot on the site to house new rolling stock in order to meet future objectives for increasing capacity on the DLR. Any development coming forward on the site will be located on top of a deck and transfer slab that is built above the expanded depot. Any development coming forward on the site would also provide 35% affordable housing in accordance with TfL commercial development objectives.

1.7 In order to fund the necessary infrastructure set out in the site allocation high quality mixed use development, possibly in the form of tall buildings, will need to be provided on the site. The site allocation and Local Plan policy D.DH6 Tall Buildings preclude the site from the Blackwall tall buildings cluster. The tall buildings cluster should be amended to include the Aspen Way site allocation and the site allocation should identify that high quality development possibly in the form of tall buildings suitable on the site and will make the site deliverable.

Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?

1.8 The Aspen Way site allocation does not take into account all of the constraints impacting upon the site. The following constraints have not been fully considered within the allocations.

- 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 site to the Northern Border of the site in South Poplar the ground level increases 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 overcome severance

1.9 These constraints will both impact upon the height and viability of the site

**What has informed the figures and layouts provided for each site allocation?
To what degree do they accurately reflect any extant planning permission?**

- 1.10 No informed figures or layouts have been provided for the Aspen Way site allocation. There is no extant planning permission on the DLR depot site regarding its potential development.

Is the overall scale and mix of development proposed for each site justified?

- 1.11 No viability assessment has been provided on the site. The site allocations methodology document states that the site is suitable for 500+ homes with no justification for that arbitrary figure. The proposed site allocation also includes Tower Hamlets College which must be re-provided and improved as part of any development scheme. TfL CD have carried out feasibility study which identifies the site that a development can come forward on the site that provides all necessary infrastructure alongside high quality residential led development in the form of tall buildings. This should be reflected in the site allocation and policy D.DH6 in the Local Plan.

Contact

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