

# Isle of Dogs Neighbourhood Plan 2017 - 2031



**Neighbourhood Plan submitted by the Isle of Dogs Neighbourhood Planning Forum on the 25<sup>th</sup> October 2017. To have effect until 31<sup>st</sup> December 2031**



## Summary

The following is the Neighbourhood Plan submitted by the Isle of Dogs Neighbourhood Planning Forum. The Forum was formed in 2014 and recognised in 2016. This Plan was submitted in 2017. It is a combination of the Policies and Backup documents that were separately consulted on in 2017.

The Plan was supported by consultants from AECOM funded by the Department of Communities and Local Government. Qinetiq also assisted the Forum in preparing the Plan.

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## GLOSSARY OF TERMS

For ease of drafting, the following defined terms are used throughout this document, and are recognisable by their use of capital initial letters.

1. Area – the word Area with a capital A is shorthand for the area recognised as the Isle of Dogs Neighbourhood Plan Area on the 5<sup>th</sup> April 2016 by LBTH
2. BREEAM – The world's leading sustainability assessment method for master planning projects, Infrastructure and buildings
3. CIL – Community Infrastructure Levy – a tax on developers to pay for Infrastructure
4. Draft Local Plan – new draft LBTH Local Plan 2031 released for public consultation 11th November 2016
5. Development Infrastructure Funding Study or DIFS – GLA-commissioned study in 2017 on the Infrastructure requirements for the OAPF area as part of the OAPF
6. Estate - A development where there are multiple Tenants and/or Leaseholders but only one freeholder, managed by LBTH, a housing association or another similar organisation
7. Forum – The Isle of Dogs Neighbourhood Planning Forum, or a successor organisation performing similar functions in respect of the Area from time to time or, if there is no such successor organisation, then an appropriate community organisation nominated by LBTH
8. GLA – Greater London Authority – the Mayor of London
9. GLA’s Housing SPG – the GLA’s Housing Supplementary Planning Guidance
10. Independent Consultation Body – an independent organisation approved by the relevant landlord, the relevant developer, and the relevant residents’ groups, reputable in the field of public consultation
11. Independent Organisation - an independent organisation approved by LBTH Democratic Services and by the relevant residents’ groups as an independent organisation, reputable in the field of managing elections and related matters
12. Infrastructure – All physical and social infrastructure and services used to support residents and workers in the Area, as defined by the LBTH Regulation 123 list as well as (without limitation) water, sewage and other utilities, and the infrastructure required to provide fuel to vehicles

13. IoD – Isle of Dogs
14. Key Sector – employees of NHS GP surgeries and state funded schools
15. LBTH – London Borough of Tower Hamlets – Tower Hamlets Council
16. Leaseholder – a person who owns a property on a lease for a fixed period of time and where there is a legally binding agreement with the landlord (freeholder). At the end of the fixed period the property returns to the landlord
17. London Plan – The Mayor of London’s plan for the whole of the GLA area
18. Long Plan – A comprehensive neighbourhood plan for the Area which the Forum proposes to prepare in due course to replace this Plan
19. MUGA – Multi Use Games Area
20. Neighbourhood Pot – The proportion of CIL collected from developers in the Area for use in the Area
21. NPPF – the National Planning Policy Framework issued from time to time by the Department for Communities and Local Government. The version current at the time of writing the Plan was released in March 2012
22. OAPF – Isle of Dogs & South Poplar Opportunity Area Planning Framework – GLA-led Masterplan for the Isle of Dogs and South Poplar
23. ONS – Office for National Statistics
24. Paris Agreement - An agreement within the United Nations Framework Convention on Climate Change (UNFCCC) dealing with greenhouse gases emissions mitigation, adaptation and finance starting in the year 2020
25. Plan – this plan, also referred to as the quick Plan
26. PTAL – Public Transport Accessibility Level, used as a measure to determine appropriate maximum development densities by TfL
27. Public Body – an organisation whose ownership of land is based on a transfer from another government organisation for nil or minimal value Sustainable Development – development that meets the needs of the present without compromising the ability of future generations to meet their own, having regard to policies in the 2012 NPPF including the five ‘guiding principles’ and three dimensions (economic, social and environmental) that it references.
28. Tenant – a person who rents accommodation from the owner of a property based on a contract. It lets them live in the property as long as they pay rent and follow the rules as set out in the contract
29. TfL – Transport for London
30. Idea Store – what LBTH call libraries

## 1. INTRODUCTION TO THE ISLE OF DOGS NEIGHBOURHOOD PLAN

The Isle of Dogs is the fastest growing place in the UK with an unprecedented level of development activity underway from a diverse set of developers from across the world. Unlike some other major development areas in London we do not have one key developer but many different ones operating independently of each other. South Quay and Millharbour will be the densest place in the UK and even those parts of the island further away from development will still be affected due to the geographical constraints of the island. We will all be relying on the same infrastructure wherever we live.

As the history chapter will show in more detail, the Isle of Dogs has made several profound transitions over the past two centuries. From being London's best pasture land for fattening cattle, to the development of the docks opening the UK up to the world, to a major centre of industrial manufacturing, to the expansion of the City of London in the 1980's to a new financial centre at Canary Wharf.

Now we are undergoing another transformation as 1980's-built offices and warehouses are being replaced with the tallest residential buildings in the UK. Nowhere in the UK or even western Europe will be as tall and dense as our Area.

There has not been a lack of planning, as Professor Matthew Carmona from the Bartlett School of Planning shows in his paper "*The Isle of Dogs: Four development waves, five planning models, twelve plans, thirty-five years, and a renaissance . . . of sorts*" published in 2009, there has been lots of planning. But what has been missing is a plan that involves and directly relates to the community, which is ambitious for the Area, which is as focussed on execution of the plan as it is on the plan itself, and which looks at the Area as a unique system requiring unique solutions. Our objective is to make the Isle of Dogs the best place to live in London for existing and future residents, making this truly sustainable development.

In the introduction to the first draft of the South Quay Masterplan, Sir Edward Lister, the then Deputy Mayor for London responsible for Planning, said in October 2014 "*South Quay is enjoying unprecedented interest from developers all of whom want to bring forward their own plans. While we want to see the comprehensive regeneration of the area, what we cannot allow is a situation where planning is granted on a first-come-first-served basis with no overall strategy, as this could eat up valuable space, have a negative impact on the public realm and potentially cause other schemes to collapse.*"<sup>1</sup>

October 2014 was also when residents first decided to set up the Isle of Dogs Neighbourhood Planning Forum for many of the same reasons as Sir Edward outlined.

Perhaps the best illustration of the scale of growth is to look at New Homes Bonus receipts from the Government which are granted as a reward to Councils for delivering new homes. Since its inception, Tower Hamlets has always been the largest recipient in the country. Earning even more than the whole City of Birmingham between 2012 and 2016.

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<sup>1</sup> <https://www.london.gov.uk/press-releases/mayoral/south-quay-masterplan-looks-at-tall-buildings>

**New Homes Bonus**

Financial Year	Tower Hamlets	Next largest recipient in year
2011/12	£4.3 million	£3.7 million Islington Council
2012/13	£10.1 million	£7.4 million Birmingham City Council
2013/14	£16.1 million	£10.3 million Birmingham City Council
2014/15	£19.5 million	£15.1 million Birmingham City Council
2015/16	£24.8 million	£17.8 million Birmingham City Council
2016/17	£28.6 million	£21.1 million Birmingham City Council
2017/18	£23.9 million	£17.1 million Cornwall UA

This Plan is uniquely focussed on dealing with the scale of growth currently underway and expected to emerge over the next fifteen years as we continue to be the most important deliverer of new homes and jobs in the country.

## 2. HISTORY OF THE ISLE OF DOGS

The Isle of Dogs was sparsely populated marshland for much of its history, which is why part of the area is called Marshwall. The quality of grazing and its proximity to what was then central London meant the area was used to fatten cattle before slaughter. Along the western side of the island, windmills were constructed leading to the area to be named Millwall. A road led down to a ferry across the Thames at what is now Ferry Street. But it was generally unpopulated pasture land for most of its history until the docks were finished in 1802.

The area has undergone five major changes in the last two hundred and fifteen years.

1. The building of secure docks to trade with the rest of the world
2. The development of heavy industry and shipbuilding
3. Decline and then closure of the docks in the 1970's and the loss of industry
4. The arrival of the London Docklands Development Corporation and then Canary Wharf
5. The arrival of the tallest and densest residential buildings in the UK

The first major change was the construction of the West India docks which completed in 1802, East India docks in 1806 and then Millwall docks in 1868. They all came under the control of the Port of London Authority in 1909. The docks provided secure berths to load and unload ships which carried trade across the world. The London & Blackwall railway opened in 1840 (but closed in 1926) and a foot tunnel was built to Greenwich in 1902.

But the area remained cut off from London, the river and docks prevented through access, and only buses carried passengers around the circumference of the island. The docks ensured the area really was an island with access interrupted by the need for ships to leave.

After the docks opened the area became a major industrial and shipbuilding area. In 1858, the SS Great Eastern was launched from what is now Burrells Wharf next to Masthouse Terrace pier. She was an iron sailing steam ship designed by Isambard Kingdom Brunel, and built by J. Scott Russell & Co. She was by far the largest ship ever built at the time of her 1858 launch. Much of the early Japanese navy was built in what is now the Samuda estate. Although as ships grew larger shipyards moved out of the area, we were still building battleships like HMS Thunderer in Blackwall which was completed in 1911.

During the 2<sup>nd</sup> World War the area was subject to heavy bombing by the Luftwaffe due to the economic importance of the area. As a result, many of our older buildings were destroyed. But after the war there was a resurgence of activity and in the 1960's and 1970's came the construction of estates like the Kingsbridge, Barkantine, St Johns, Samuda and New Union Wharf.

But these new estates were not supported by new Infrastructure and, in March 1970, Cllr Ted Johns blocked the two swing-bridges that connect the island to the mainland, stopping cars from entering. The island was sealed off from the outside world for two hours. "*We have declared UDI and intend to set up our own council,*" declared Johns, a 37-year-old office worker and Labour councillor for the area. He called for better roads, more buses, better shops and a cut in rates. "*We can govern ourselves much better than they seem to be doing,*" he declared. "*They have let the island go to the dogs.*"<sup>2</sup> It was a plea for better Infrastructure and more attention from the rest of London and Tower Hamlets. Some things have not changed.

This led indirectly to the building in the late 1970's of the ASDA supermarket and the George Green secondary school, both the first in the area.

London docks started to close throughout the 1970's and the West India and Millwall docks closed in 1980. Heavy industry either closed or moved away to larger sites with better transport links. This left large areas of empty and derelict land. The population of the island declined to a low of 12,500 people by the mid-1980's.

The result was the London Docklands Development Corporation (LDDC) set up in 1981 by the Government to help regenerate the former docks areas in Newham, Tower Hamlets and Southwark. It helped to create Canary Wharf, Surrey Quays shopping centre, London City Airport, ExCeL Exhibition Centre and the Docklands Light Railway. It also brought the Jubilee line to Canary Wharf in the late 1990's. Most of the infrastructure we rely on today was delivered by the LDDC before its departure in 1996 but, by being imposed by the Government on the existing community, it never received the support of that community. The LDDC led to the development of what is now Canary Wharf with the completion in 1991 of 1 Canada Square, which was for many years the tallest office building in London and even today sets height limits for the area (together with London City Airport approach routes). Also in the late 1980's a new generation of residential developments like Cascades, Burrells Wharf and Cyclops Wharf started a new phase of residential development that continues today, each generation being taller and denser than those before.

The first planning response after the LDDC left was the Millennium Quarter Masterplan from the year 2000 for the Millwall area. It set a number of planning policies on height and type of building but, when the Landmark and Pan Peninsula developments were approved in 2004 as what were then the tallest residential buildings in the UK, those policies became defunct. The Millennium Quarter Masterplan bares little relationship to what was actually delivered in the area, especially the substitution of residential buildings for offices.

But since then we have seen more and more residential development, often replacing offices or light industrial units built in the 1980's. Although the financial crisis of 2007-8 slowed down

<sup>2</sup> <https://www.theguardian.com/news/2004/may/12/guardianobituaries.politics>

development, it did not end it and schemes came forward post-crisis even bigger than the schemes preceding it, as the development industry became more familiar with building tall.

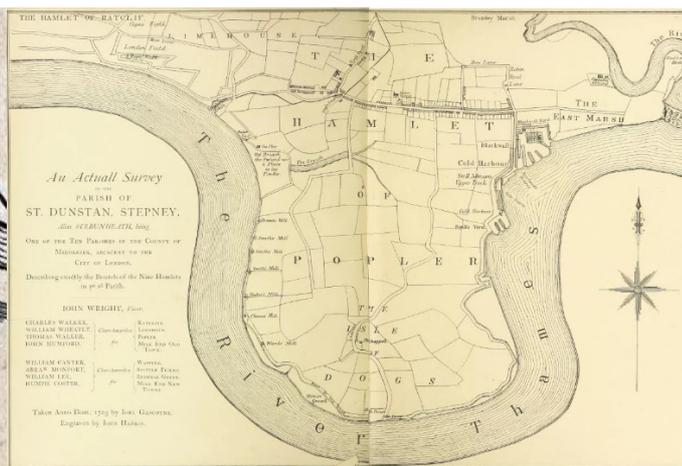
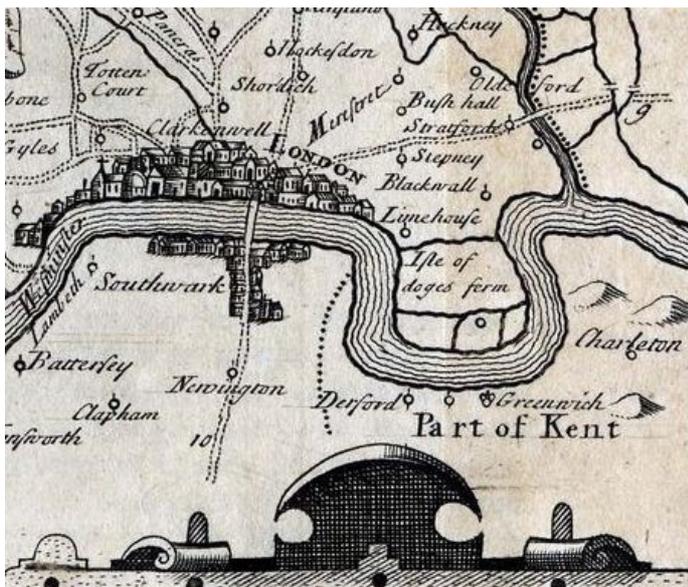
The following maps provide a guide to how the area has changed over time. But the rate of change is now so rapid that it is impossible for 2D maps to tell the story, which is why we are so keen on 3D visualisations to track what is changing.

**1593**

The island is described as a farm, with no churches. The City of London is to the west.

**1703**

Mills down the western side of the island (Millwall), Blackwall Yard docks, but most of the area is farmland

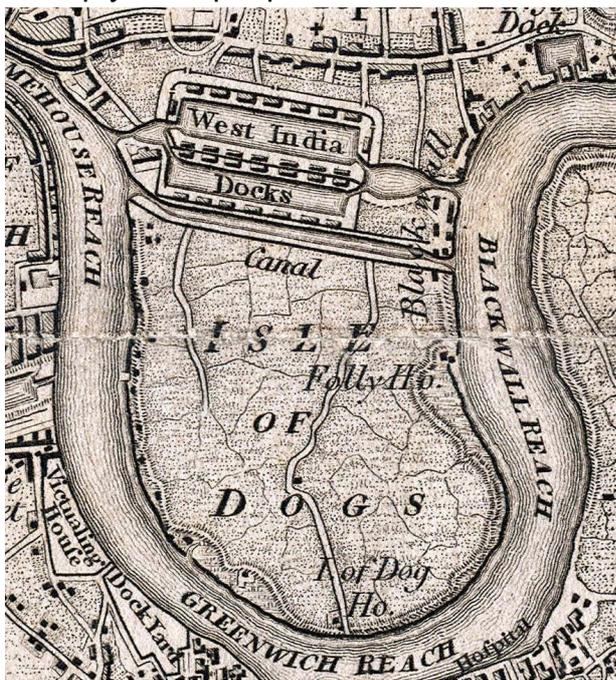


**1801**

An island is created, cut off by West India docks to the north. But the center of the island is empty. Few people live here.

**1862**

The river edges are starting to be occupied by industry but most people still live in Poplar or Greenwich.

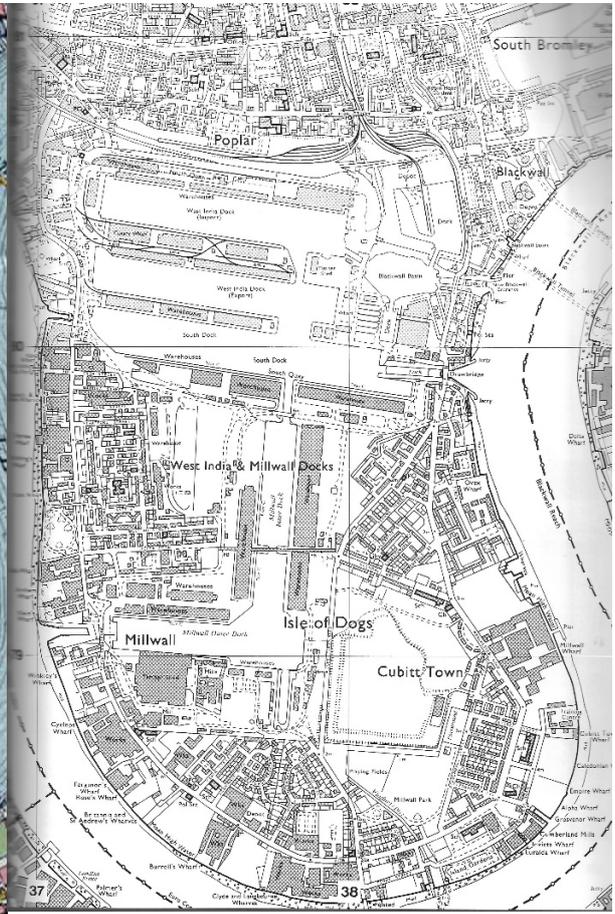
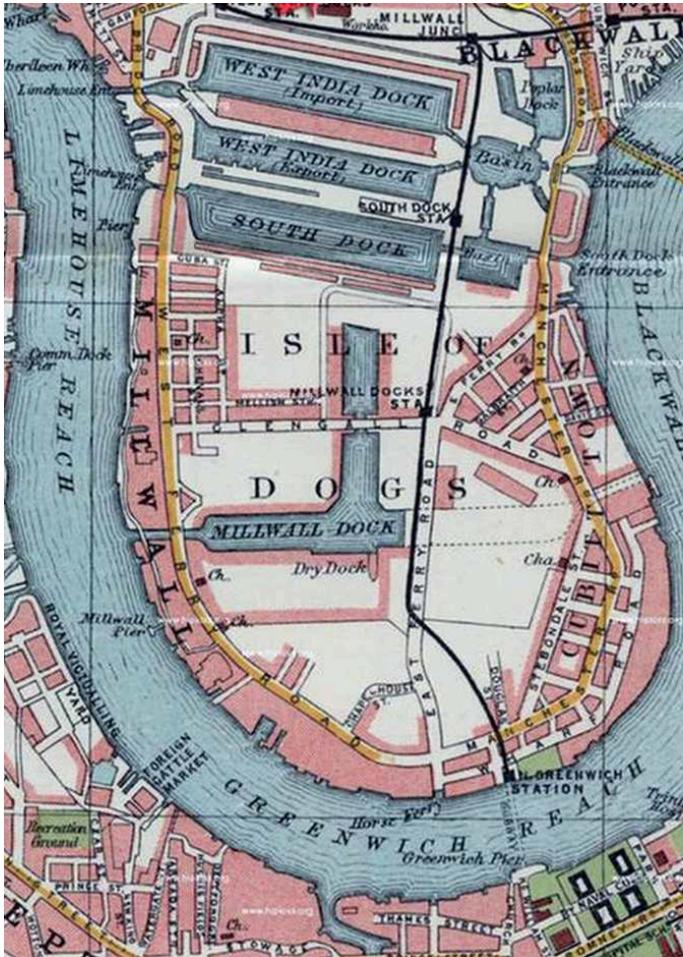


**1920**

There is now some housing especially in Cubitt Town and Millwall but most of the area is industrial or docks

**1982**

Between the docks closing and the LDDC-inspired changes to the Area. The last map of area before the 80's changes



**2031 Map?** – based on known developments (as at 2015) from our own 3D map



### 3. CHALLENGES – WHAT PROBLEMS ARE WE TRYING TO SOLVE?

The Isle of Dogs and the area immediately to its north currently has under construction the tallest residential buildings not just in London but in western Europe. In Canary Wharf to our north we have some of the most important new office buildings in London. Developments include for example:

**Table 1**

	<u>Building</u>	<u>Developer</u>	<u>Height (meter)</u>	<u>Storeys</u>	<u>Apartments</u>
1	The Spire, West India Quay	Greenland	242	67	861
2	Landmark Pinnacle (City Pride) & Island Point, Marsh Wall	Chalegrove	239	75	1,157
3	South Quay Plaza 1, 2 & 4, Marsh Wall	Berkeley Homes	220	68	1,284
4	Newfoundland, Canary Wharf	Canary Wharf Group	218	60	575
5	Alpha Square, Marsh Wall	FEC	213	63	685
6	Herzog de Meuron, Canary Wharf	Canary Wharf Group	212	57	3,600
7	3 & 2 Millharbour	Galliard	148	44	2,414
8	London City Island, Blackwall	Ballymore		26	1,706
9	Wardian, Marsh Wall	Ballymore	188	55	756
10	Westferry Printworks, Westferry	Northern & Shell		30	722
11	Blackwall Reach (Robin Hood Gardens)	Tower Hamlets Council			1,513
12	ASDA re-development (2012 application)	Arzan Wealth	87	23	850

We also have new planning applications approaching at North Quay, ASDA (recently withdrawn for review) and Skylines.

We are already the fastest growing borough in the country, with the ONS in May 2016 reporting that the population of Tower Hamlets is projected to soar by more than a quarter, or 71,400, to 355,400 by 2024. This is how the Evening Standard reported it:

News › London

## Tower Hamlets is fastest-growing borough in UK as London population surges again

JONATHAN PRYNN | Wednesday 25 May 2016 | [16 comments](#)

,The ONS and GLA forecast future population numbers using different assumptions and our own analysis suggests a third set of numbers. But whichever set of numbers you look at, they all show substantial increases in population in Tower Hamlets and the island.

### Population Growth Tower Hamlets as a whole

**Table 2**

Population Statistics by Year	Census Data (Nomis)	Short Term GLA Fcst	Long Term GLA Fcst	Increase on previous period	ONS 2014 Fcst	Increase on previous period
1981	138,076					
1991	147,896			7%		
2001	196,106			33%		
2011	256,685			31%		
2016		290,632	298,105	16%	303,900	18%
2021		305,614	327,283	10%	339,000	12%
2026		317,658	349,351	7%	365,400	8%
2031		328,272	367,451	5%	388,400	6%
2036		337,866	383,007	4%		
2041		346,007	395,878	3%		

The table above shows the rate of growth expected in Tower Hamlets as a whole. There are two GLA growth options, Short and Long, which differ on the scale of immigration forecast. The ONS forecast is again based on different assumptions.

According to the ONS mid-year population estimates, the borough's population was 304,900 in June 2016.

### GLA 2014 Ward Atlas including population forecast and comparisons

**Table 3**

Population Forecast	2001	2006	2011	2016	2023	2028
Blackwall & Cubitt Town	8,900	10,800	14,200	18,500	28,400	31,000
Canary Wharf ward	7,300	8,800	12,700	14,600	19,600	22,800
Island Gardens ward	8,100	9,800	13,900	16,500	22,900	26,100
<b>Total Isle of Dogs</b>	<b>24,300</b>	<b>29,400</b>	<b>40,800</b>	<b>49,600</b>	<b>70,900</b>	<b>79,900</b>
% change on previous period		21%	39%	22%	43%	13%
Poplar ward	5,200	5,800	7,000	8,000	10,200	10,800
<b>Total OAPF area</b>	<b>29,500</b>	<b>35,200</b>	<b>47,800</b>	<b>57,600</b>	<b>81,100</b>	<b>90,700</b>

		19%	36%	21%	41%	12%
	2001	2006	2011	2016	2023	2028
<b>Population Forecast</b>	<b>2001</b>	<b>2006</b>	<b>2011</b>	<b>2016</b>	<b>2023</b>	<b>2028</b>
<b>Tower Hamlets total</b>	<b>202,100</b>	<b>218,300</b>	<b>256,500</b>	<b>290,300</b>	<b>346,500</b>	<b>366,700</b>
% change on previous period		8%	17%	13%	19%	6%
<b>Total London population</b>	<b>7.3 million</b>	<b>7.6 million</b>	<b>8.2 million</b>	<b>8.7 million</b>	<b>9.4 million</b>	<b>9.7 million</b>
% change on previous period		4%	8%	6%	7%	3%
<b>England and Wales total population</b>	<b>52 million</b>	<b>54 million</b>	<b>56 million</b>	<b>58 million</b>	<b>61 million</b>	<b>63 million</b>
% change on previous period		3%	4%	4%	5%	3%

	2016 growth on 2001	2028 growth on 2016	2028 growth on 2001
Blackwall and Cubitt Town	108%	68%	248%
Canary Wharf	100%	56%	212%
Island Gardens	104%	58%	222%
<b>Total Isle of Dogs</b>	<b>104%</b>	<b>61%</b>	<b>229%</b>
% change on previous period			
Poplar	54%	35%	108%
<b>Total OAPF area</b>	<b>95%</b>	<b>57%</b>	<b>207%</b>
Tower Hamlets total	44%	26%	81%
London	19%	11%	32%
England and Wales	11%	8%	20%

<https://data.london.gov.uk/dataset/ward-profiles-and-atlas>

The GLA 2014 forecasts show that the rate of growth in both historic and future forecasts on the Isle of Dogs is substantially higher than for Tower Hamlets, London and England as a whole.

However, these are based on 2014 data and as the next two tables show the rate of population increase has grown.

**Population Growth by ward between 2015/16 and 2031 – Draft Local Plan**

2015 data is from the ONS by 2014 ward boundaries and the growth numbers are from the draft LBTH 2016 Local Plan calculated by LBTH in 2016 and will be more up to date than the GLA forecast.

**Table 4**

	<b>2015 Total</b>	<b>2015/6- 2031 growth</b>	<b>2031 Total</b>	<b>Increase over 2015</b>
Source	ONS	Local Plan draft		
Blackwall & Cubitt Town	16,854	25,200	42,054	150%
Canary Wharf	16,576	21,400	37,976	129%
Island Gardens	15,942	600	16,542	4%
<b>Isle of Dogs Total</b>	<b>49,372</b>	<b>47,200</b>	<b>96,572</b>	<b>96%</b>
Poplar	7,458	6,200	13,658	83%
<b>Total OAPF area</b>	<b>56,830</b>	<b>53,400</b>	<b>110,230</b>	<b>94%</b>

Note that these numbers are in excess of the GLA forecast which assumes a population of 90,700 by 2028 in the OAPF area.

**Population Growth by ward between 2015/16 and 2031 – Neighbourhood Plan**

The growth numbers below are taken from the Neighbourhood Plan development database and is based therefore on known developments. It includes an estimate of developments currently in the consultation process but which do not yet have planning permission (including the Project Stone estate regeneration proposals).

**Table 5**

	<b>2015</b>	<b>Growth</b>	<b>2031</b>	
Source	<b>ONS</b>	<b>NP draft</b>	<b>NP Model</b>	
Blackwall & Cubitt Town	16,854	28,595	45,449	170%
Canary Wharf	16,576	28,295	44,871	171%
Island Gardens	15,942	964	16,906	6%
<b>Isle of Dogs Total</b>	<b>49,372</b>	<b>57,854</b>	<b>107,226</b>	<b>117%</b>
Poplar	7,458	3,527	10,985	47%
<b>Total OAPF area</b>	<b>56,830</b>	<b>61,381</b>	<b>118,211</b>	<b>108%</b>

### **Population of the Neighbourhood Plan Area**

Unfortunately, the only way to calculate the population of the Area (as defined in this Plan) is to add up the Lower Layer Super Output Area (LSOA) population data available from Census data. This is because our boundary does not correspond to any existing boundaries and is unique (the Area was imposed on us by LBTH in April 2016, see Chapter 6 below).

Eighteen LSOA's are wholly within the Area, but the following LSOAs cut across the Area boundary and we have had to estimate the population split in 2001 and 2011 between what is in the Neighbourhood Plan Area and what is not. Tower Hamlets LSOA 028D, 028I, 033A, 033B

Below is a forecast split between the Neighbourhood Plan Area, the total of the three Isle of Dogs wards (based on the original application) and the OAPF area.

**Table 6**

	<b>2001</b>	<b>2011</b>	<b>Growth % on 2001</b>	<b>2031</b>	<b>Growth % on 2011</b>
NP Area total	20,068	33,070	65%	77,027	133%
Isle of Dogs wards total	24,300	40,800	68%	107,226	163%
OAPF Area	30,285	47,664	57%	118,211	148%

### GLA CITY IN THE EAST FORECAST

In October 2015, the GLA released a forecast for growth across east London called the 'City in the East'. It forecast an additional 30,000 new homes and 110,000 jobs in the Isle of Dogs plus more in Blackwall and Leamouth. The Isle of Dogs includes Canary Wharf in the GLA analysis.

While the majority of new jobs are just outside of the Area in Canary Wharf, they will have a clear knock-on impact on the Area, such workers at lunchtime or after work eating, drinking or exercising in our Area. It will also drive more residential demand.

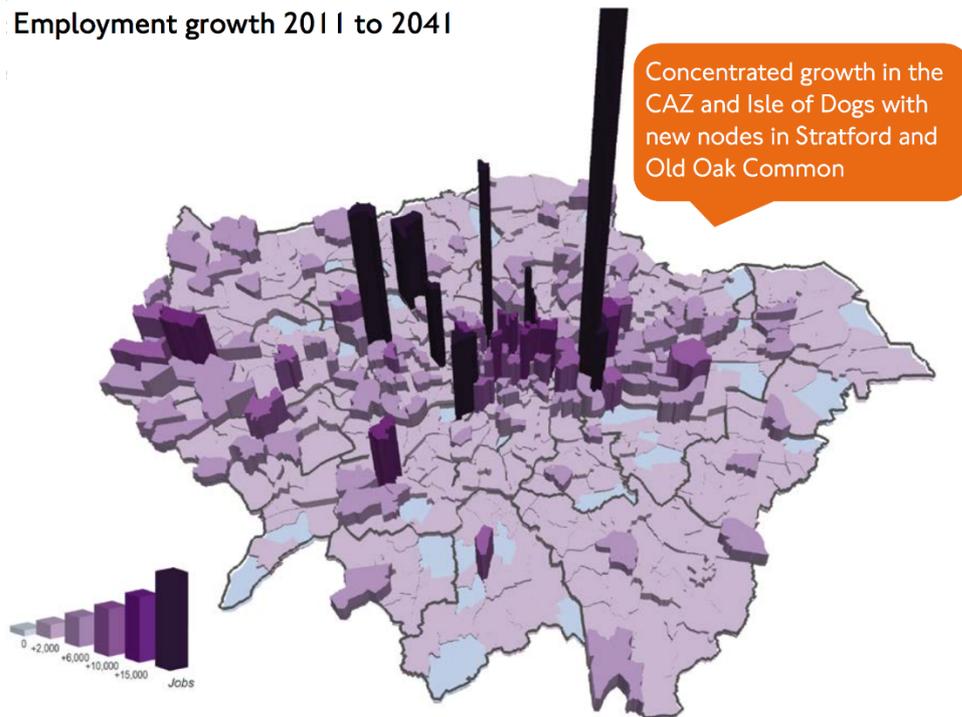
[https://www.london.gov.uk/sites/default/files/city\\_in\\_the\\_east-may\\_2016.pdf](https://www.london.gov.uk/sites/default/files/city_in_the_east-may_2016.pdf)

### GLA TRANSPORT AND JOBS FORECAST

The Mayor of London in summer 2017 released the 'Mayor's Transport Strategy: Supporting Evidence'. In it is this comment: "*Tower Hamlets – containing Canary Wharf and the Isle of Dogs – will contain 450,000 jobs.*" There were about 260,000 jobs in 2016. The picture below indicates that most of that growth will be on the Isle of Dogs.

*"Significant growth is expected across Inner East London to 2041, with the potential to deliver more than 100,000 new homes and 170,000 new jobs. Within this, the northern part of the Isle of Dogs will continue to act as a global employment hub, at Canary Wharf."*

## Employment growth 2011 to 2041



## GLA ISLE OF DOGS &amp; SOUTH POPLAR OPPORTUNITY AREA PLANNING FRAMEWORK (OAPF)

To quote the GLA introduction to the OAPF:

*“The Mayor of London, and Transport for London are working together to prepare an Opportunity Area Planning Framework (OAPF) for the Isle of Dogs & South Poplar in consultation with Tower Hamlets Council. This planning document is a tool for guiding growth in London and is a key part of the ‘City in the East’ plan.*

*Unique amongst London’s Opportunity Areas, the Isle of Dogs and South Poplar is currently experiencing intense development pressure, mainly because of new, very high density housing. The Isle of Dogs has the potential to grow and deliver many of the homes and jobs that London needs, but unlike some other opportunity areas, it also has established residential and commercial communities, and the views of these communities on growth are important.”*

The OAPF area is larger than just the Isle of Dogs as it covers the Canary Wharf, Blackwall & Cubitt Town, Island Gardens and Poplar wards.

The GLA estimate the area contains 23,000 homes with 52,500 people plus 19,000 homes with planning permission on 49 hectares of land. That would leave up to 96 hectares of potentially developable land.

<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/opportunity-areas/opportunity-areas/isle-dogs-and-south>

The GLA are currently undertaking a Development Infrastructure Funding Study (DIFS) due to complete and be available by summer 2017. The contract was to model the Infrastructure requirements of an additional 56,500 homes and 110,000 workers (although we understand that the DIFS is now looking at a range of different options and at a maximum number below the 56,500 advertised).

More detailed numbers are expected to be published in due course..

<https://www.london.gov.uk/decisions/dd2006-isle-dogs-area-planning-framework>

## HOUSING TARGETS

### London Plan 2015

The London Plan sets a target for the Isle of Dogs of an additional 10,000 homes on page 349, but Tower Hamlets has the following targets:

Tower Hamlets Table 3.1 Annual average housing supply monitoring targets 2015 – 2025 p110

	Minimum ten year target 2015-2025	Annual monitoring target 2015-2025
Tower Hamlets	39,314	3,931

These are the highest housing targets in London.

### Government Target

Of note is that the Department of Communities and Local Government on the 14<sup>th</sup> September 2017 released a “*Planning for the right homes in the right places: consultation proposals*”, which had the following housing numbers for Tower Hamlets implying that the target per year should be 4,873 homes: substantially higher than even the GLA target.

Local Authority	Indicative assessment of housing need based on proposed formula, 2016 to 2026 <i>(dwellings per annum)</i>	Current local assessment of housing need, based on most recent publically available document <i>(dwellings per annum)</i>
Tower Hamlets	4,873	2,428

These are the highest numbers in the country.

<https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

## LOCAL PLAN 2031 – REGULATION 19 CONSULATION

The following are excerpts from draft Local Plan Regulation 19 consultation document which started public consultation in October 2017.

<http://democracy.towerhamlets.gov.uk/documents/s112317/5.12a%20Appendix%201%20Draft%20Local%20Plan%20Regulation%2019.pdf>

## Chapter 4: Meeting housing needs p247

Lower Lea Valley is also in the E14 postcode area.

**Table 2: Minimum number of additional homes across sub-areas (2016 - 2031)**

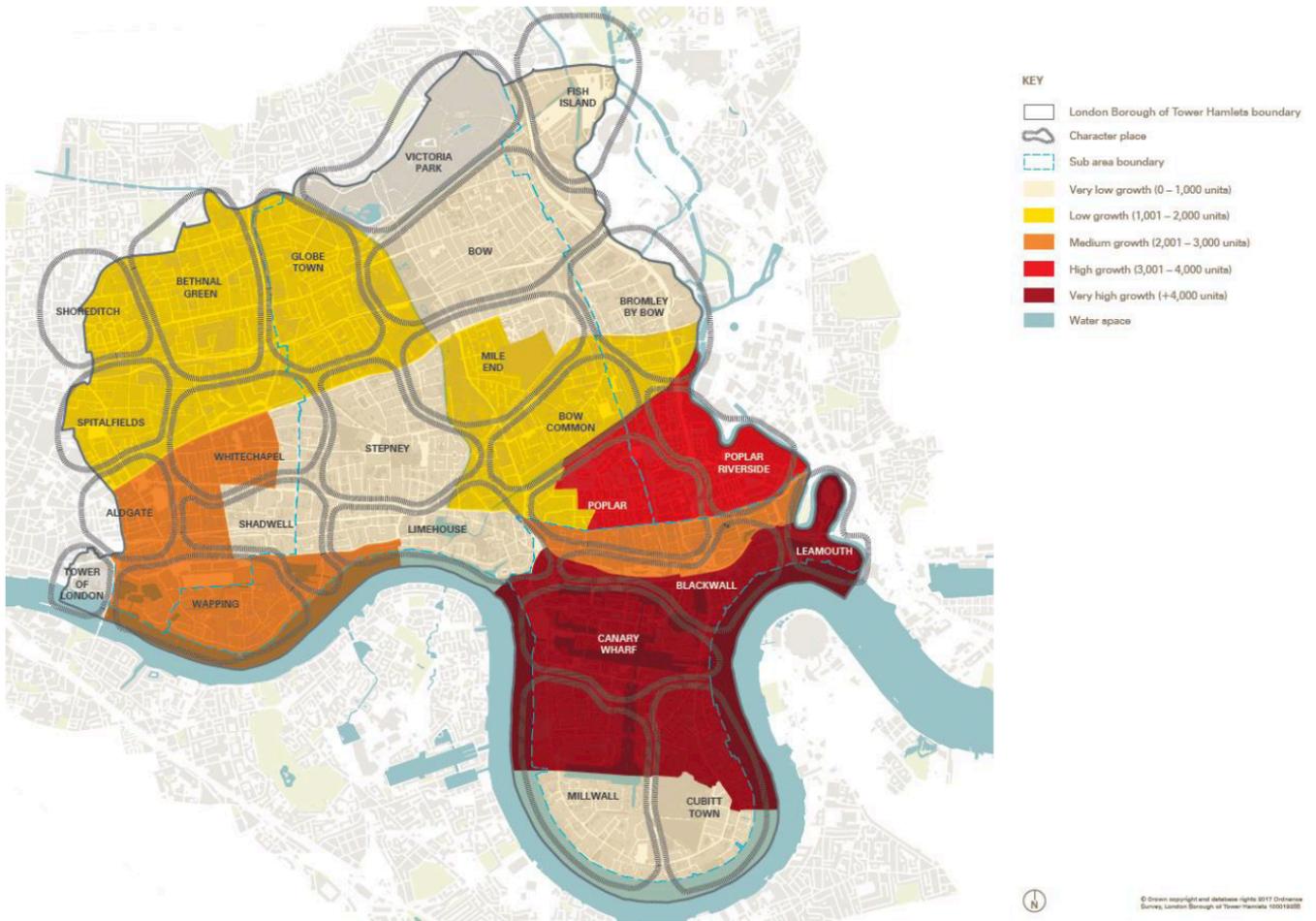
Sub area	Minimum number of additional homes	Percentages
Isle of Dogs & South Poplar	29,848	56%
City Fringe	9,330	19%
Lower Lea Valley	5,395	11%
Central Area	6,671	14%
Borough-wide windfall allowance	3,010	
Tower Hamlets: total	54,455	100%

## Housing pipeline and trajectory against targets p235

	Isle of Dogs & South Poplar	City Fringe	Lower Lea Valley	Central	Total
<b>Completed (2016/17)*</b>	1,625	891	629	1,115	4,260
<b>Conventional housing</b>					
Under development	12,846	1,470	1,560	1,057	16,933
Prior approval	119	178	0	43	340
Full planning permission	4,831	1,148	366	843	7,188
Hybrid planning Permission	0	1,779	0	0	1,779
Outline planning permission	0	774	130	103	1,007
Allocations (without permission)	9,561	652	2,186	1,146	13,546
SHLAA (without permission)	836	2,426	524	2,080	5,866
<b>Non-conventional housing</b>					
Under development	0	0	0	412	412
Full planning permission	30	12	0	72	114
<b>Borough-wide windfall allowance**</b>	753	753	753	753	3,010
<b>Minimum number of additional homes between 2016-31</b>	30,601	10,083	6,148	7,624	54,455
<b>Percentages</b>	56%	19%	11%	14%	100%

The following map more clearly indicates where development is expected.

**Figure 10: Housing distribution across 24 places**

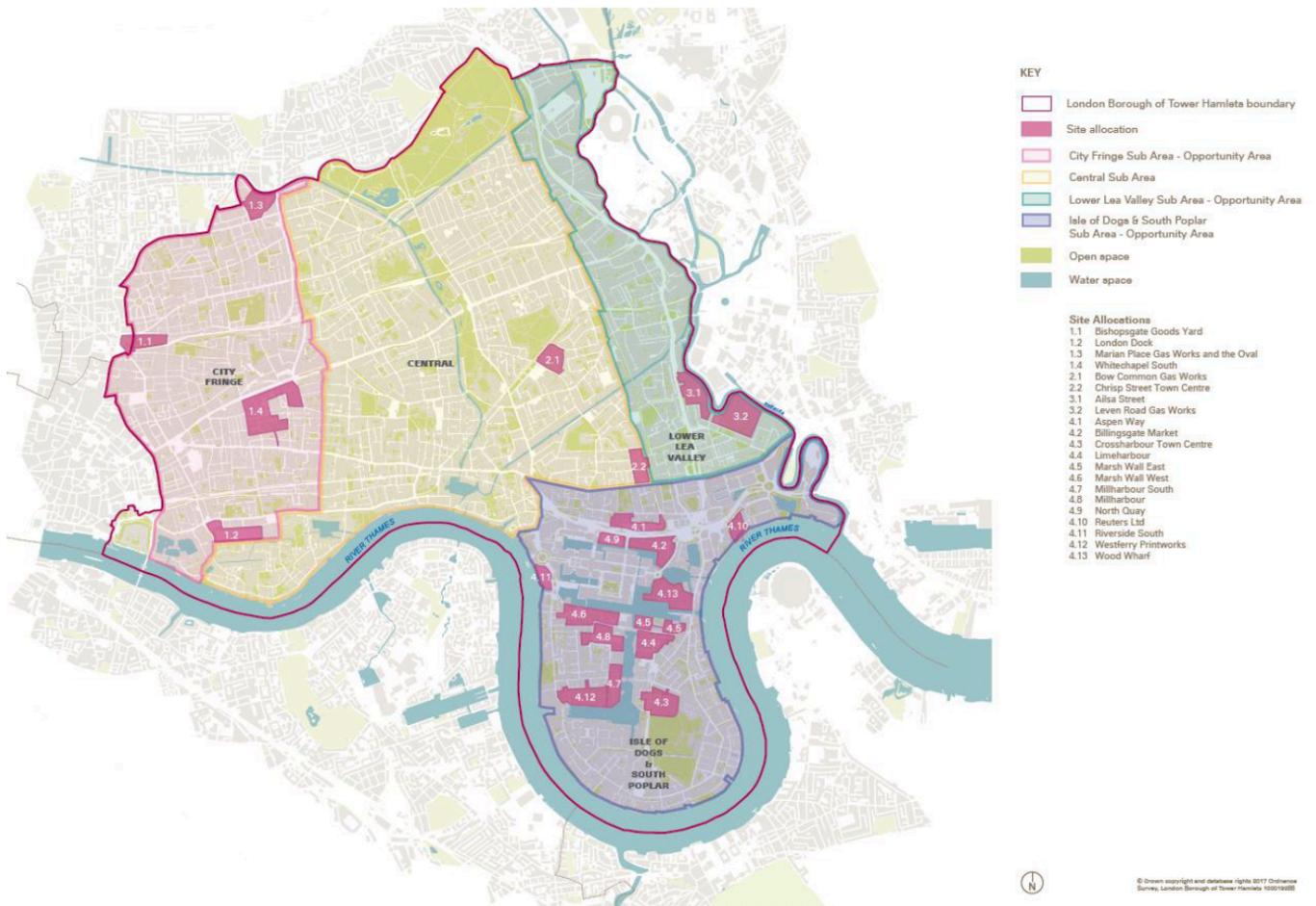


Site Allocations in the Draft Local Plan

There are twenty-one site allocations in the Draft Local Plan.

Sixteen are in the E14 postcode area. Thirteen are in the OAPF area (twelve in the original Forum area). There are eight in the current Forum area with two bordering the Forum area on its northern boundary.

Figure 19: Sub-areas and site allocations



Site Allocation Requirements (By site) – the last 2 are not in the Area but adjoin its northern border

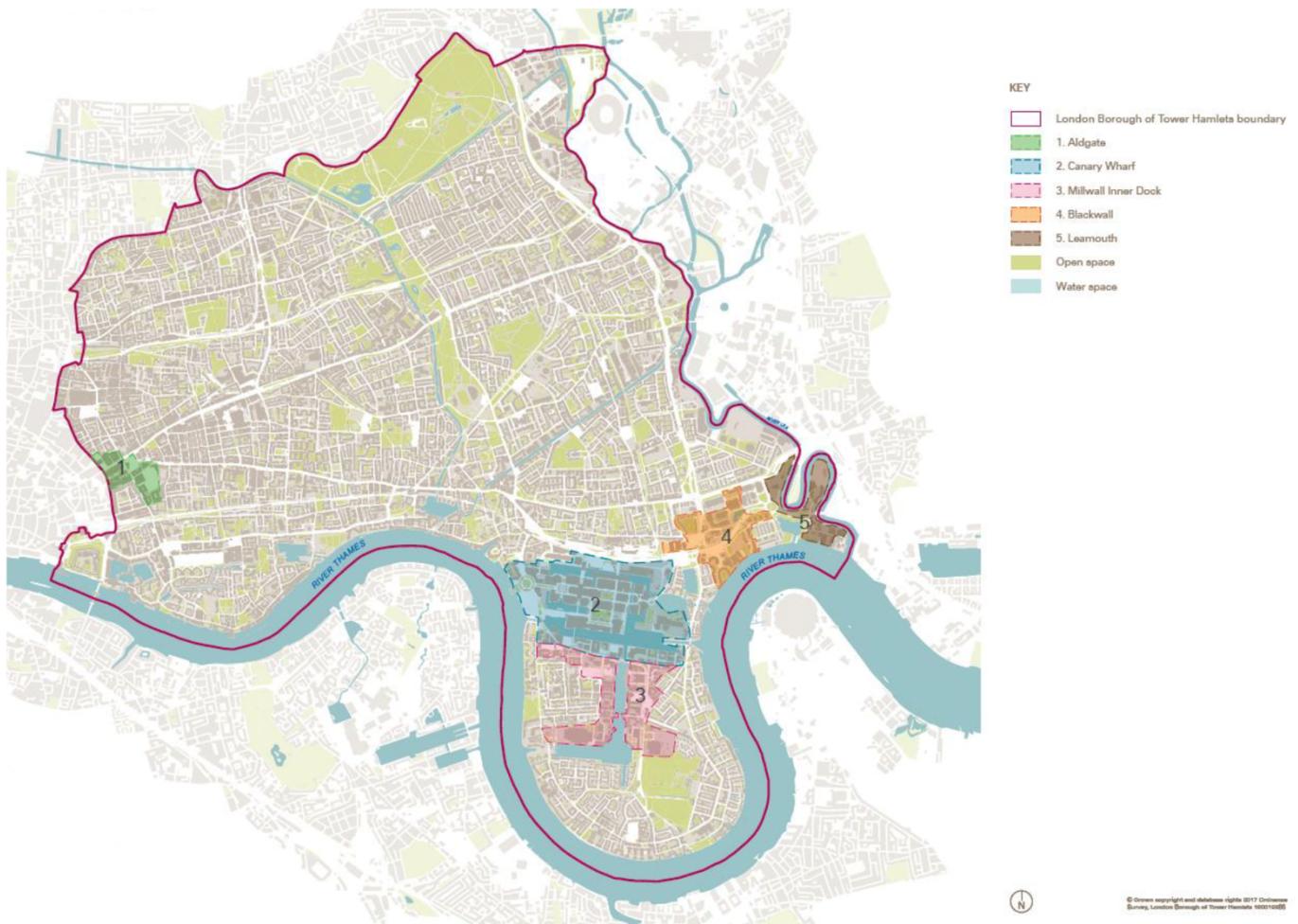
	Housing	School	Health	Open Space	Community Space
Westferry	Yes	Yes	No	Yes	Yes
ASDA Crossharbour	Yes	Yes	Yes	No	Yes
Millharbour	Yes	Yes	Yes	Yes	No
Millharbour South	Yes	Yes	Yes	Yes	No
Marsh Wall West	Yes	Yes	Yes	Yes	No
Marsh Wall East	Yes	Yes	Yes	Yes	No
Limeharbour	Yes	Yes	Yes	Yes	No
Wood Wharf	Yes	Yes	Yes	Yes	Yes
Riverside South	Yes	No	No	No	No

This supports the Plan policy D1, as it makes clear that many of the main sites can support a wide range of Infrastructure.

### Tall Building Zone

There are five proposed tall buildings zones across Tower Hamlets in the Draft Local Plan. Two in the current Forum Area and four in the original Forum area. These clearly indicate a focus on the OAPF area as being where dense development is expected.

Figure 8: Tall building zones



## DENSITY

With such tall buildings in close proximity to each other in a geographically constrained space, it is inevitable that we will experience extremely high levels of density.

In a national report, the ONS had this to comment about an LSOA area in Millharbour: “*The LSOA with the highest population density in mid-2014 (in the UK) was Tower Hamlets 032D. This is an area where approximately 3,100 people live in 0.03 square kilometres, resulting in a density of 92,700 persons per square kilometre. It is located on the western side of Millwall Inner Dock on the Isle of Dogs. Tower Hamlets 032D became the LSOA with the highest population density in*

mid-2013 (80,300). The population density of Tower Hamlets 032D has increased from 47,100 people per square kilometre in 2011.”<sup>3</sup> LSOA – Lower Super Output Area

As a reminder, the London Plan has the following table on density;

**Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)**

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150–200 hr/ha	150–250 hr/ha	200–350 hr/ha
3.8–4.6 hr/unit	35–55 u/ha	35–65 u/ha	45–90 u/ha
3.1–3.7 hr/unit	40–65 u/ha	40–80 u/ha	55–115 u/ha
2.7–3.0 hr/unit	50–75 u/ha	50–95 u/ha	70–130 u/ha
<b>Urban</b>	<b>150–250 hr/ha</b>	<b>200–450 hr/ha</b>	<b>200–700 hr/ha</b>
3.8–4.6 hr/unit	35–65 u/ha	45–120 u/ha	45–185 u/ha
3.1–3.7 hr/unit	40–80 u/ha	55–145 u/ha	55–225 u/ha
2.7–3.0 hr/unit	50–95 u/ha	70–170 u/ha	70–260 u/ha
<b>Central</b>	<b>150–300 hr/ha</b>	<b>300–650 hr/ha</b>	<b>650–1100 hr/ha</b>
3.8–4.6 hr/unit	35–80 u/ha	65–170 u/ha	140–290 u/ha
3.1–3.7 hr/unit	40–100 u/ha	80–210 u/ha	175–355 u/ha
2.7–3.0 hr/unit	50–110 u/hr	100–240 u/ha	215–405 u/ha

#### Notes to Table 3.2

Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility (PTAL). The setting can be defined as:

- central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre.
- urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes

The PTAL (as defined in the Glossary of Terms, and which describes how good your access to public transport is with 6b being the best to 0 being the worst) of the Neighbourhood Plan Area ranges from 1b to 5 with the majority being 2 and 3 as can be seen in the heat map below, with small areas of yellow PTAL 4 close to DLR stations, and a small section of pink PTAL 5 in the extreme north-west corner. The attached screen shot is from the WebCAT tool (based on a 2021 forecast which will include Crossrail).

Taking the central range, this suggest much of the Area should be developed at 300 to 650 habitable rooms per hectare with some smaller areas developed at 650 to 1,100 habitable rooms per hectare.

<sup>3</sup><http://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualsmallareapopulationestimates/mid2014andmid2013>

This is not what is being developed, which underlines why we need a Neighbourhood Plan. Below is a summary of the density in the last 14 planning applications in or close to the Area:

## WebCAT

Address or co-ordinates

eg. NW1 6XE or 530273, 179613

Go

Access level (PTAL)

Time mapping (TIM)

PTAL: a measure which rates locations by distance from frequent public transport services.

### Map key - PTAL

	0 (Worst)		1a
	1b		2
	3		4
	5		6a
	6b (Best)		

### Map layers

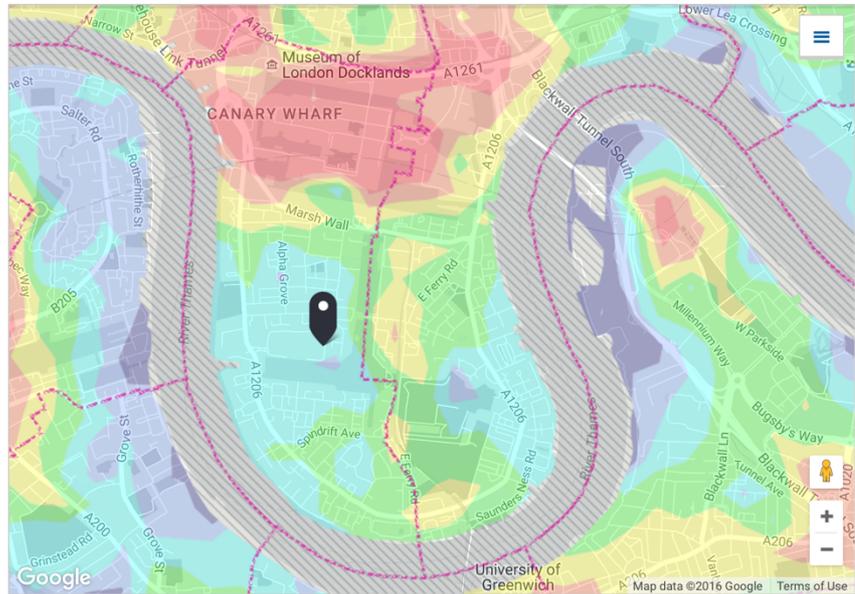
	PTAL (cell size: 100m)		Ward Boundaries
--	------------------------	--	-----------------

### Scenario

2021 (Forecast)



Update



You can click anywhere on the map to change the selected location.

PTAL output for 2021 (Forecast)

1b

Telegraph & Express Print Works, Isle of Dogs, London E14 8NX, UK

4

In 2015, a group of architects produced a report called “*Super density, the sequel*”. It suggested solving London’s housing needs by developing super dense schemes of around 350 homes per hectare. <http://www.superdensity.co.uk>

On page 10 of its recommendation It makes this point:

*“Resist ‘hyperdensity’: there should be a presumption against ‘hyperdense’ developments over 350 homes per hectare, which should be confined to exceptional locations and subject to exceptional justification. At these densities, and even with the best practice approach we advocate, it is very difficult to create the conditions that allow mixed communities to thrive.”*

However, this is not what is happening on the wider Isle of Dogs. The following are the densities currently being granted planning permission:

<sup>4</sup> <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat?lat=51.492660&lon=-0.011312&type=Ptal&locationId=&input=&scenario=2021+%28Forecast%29>

**Density of Recently Approved Developments in the Isle of Dogs area****Table 7**

HRPH = Habitable rooms  
per hectare

UPH = Units per hectare

<b>Scheme</b>	<b>Units</b>	<b>Density HRP</b>	<b>Density UPH</b>	<b>Height (m) AOD</b>	<b>Hectares</b>
<b>London Plan maximum recommended target</b>					
		<b>1,100</b>	<b>405</b>		
The Spire, West India Quay	861	5,814	2,327	241	0.3
Landmark Pinnacle, Marsh Wall	984	5,803	3,514	239	0.3
Alpha Square, Marsh Wall	685	5,403	1,776	213.5	0.4
Wardian, Marsh Wall	756	3,357	1,400	188	0.5
The Madison, Marsh Wall	423	2,850	1,113	187	0.4
Newfoundland Tower, Westferry Rd	575	2,738	1,138	226	0.5
Helix, Preston's Roundabout	414	2,558	1,035		0.4
2 Millharbour	901	2,492	868	148	1.0
South Quay Plaza, Marsh Wall	888	2,140	826	220	1.1
Horizons, Preston's Rd	190	2,103	760		0.3
Wood Wharf, Canary Wharf	3,600	1,796	786	211.5	4.6
3 Millharbour	1,500	1,785	577	146.6	2.6
Providence Tower, Blackwall	484	1,429	544	142	0.9
7 Limeharbour	167	1,320	576		0.3
<b>Total/Average</b>	<b>12,428</b>		<b>914.9</b>		<b>13.6</b>

The following table is from the Strategic Environmental Assessment for the South Quay Masterplan Supplementary Planning Document, Final Environmental Report, which was prepared by LUC in association with Cascade Consulting on behalf of London Borough of Tower Hamlets. It looks at the likely effects of different development options with increasing levels of density (pre-

mitigation), with option 5 being the densest. It clearly shows the negative effects of high density living without adequate mitigation (red is negative, green is good).

Mitigating the impact of this level of density is a major focus of the Forum.

Table 6.1 – Summary of SEA of Different Amounts of Development Options (Pre-mitigation)

SEA Objectives	Likely Effects				
	Option 1 (1,100 hr/ ha)	Option 2 (2,000 hr/ ha)	Option 3 (3,000 hr/ha)	Option 4 (4,500 hr/ ha)	Option 5 (7,000 hr/ ha)
1. To create and sustain a liveable, well-designed environment that promotes long-term social cohesion, sustainable healthy lifestyles and a sense of place	-/?	--/?	--/?	--/?	--/?
2. To protect, conserve and enhance the biodiversity within the Masterplan Area and wider borough and where appropriate create habitats, green and open spaces and watercourses	-/?	-/?	--/?	--/?	--/?
3. To minimise flood risk to people and property within the Masterplan Area, the wider borough and elsewhere, and promote the use of sustainable urban drainage systems	+/-/?	+/-/?	--/+/?	--/+/?	--/+/?
4. To enhance and protect the significance of heritage assets and archaeological heritage	-/?	-/?	--/?	--/?	--/?
5. To enhance local townscape/ landscape character and improve the quality of the built environment and public open spaces	-/?	+/-/?	+/-/?	-/?	--
6. To achieve a planned and aesthetically balanced skyline, as seen in protected views	0	0/-	+/-/?	--/+/?	--/?
7. To protect views and the visual amenity of people living and working in and visiting the area and surroundings	?	?	-/?	-/?	--/?
8. To increase the proportion of journeys made by walking and cycling followed by bus or train (relative to those taken by the car)	+/-/?	--/?	--/?	--/?	--/?
9. To maximise the accessibility to key services and amenities	-/?	-/?	--/?	--/?	--/?
10. To improve the quality of water within the Masterplan Area and to achieve the wise management and sustainable use of water resources	-/?	-/?	--/?	--/?	--/?
11. To minimise the production of waste across all sectors and increase reuse, recycling, remanufacturing and recovery rates	-/?	-/?	--/?	--/?	--/?
12. To protect existing, make provision for new, and maximise accessibility to education facilities to meet the needs of all sectors of the population	++/-/?	++/-/?	++/-/?	++/-/?	++/-/?
13. To maximise the health and well-being of the population and reduce inequalities in health	++/-/?	++/-/?	++/-/?	++/-/?	++/-/?
14. To ensure that all residents have access to good quality, well-located, affordable housing that promotes liveability	++/?	++/-/?	++/-/?	++/-/?	++/-/?
15. To provide all residents with the opportunity of employment, particularly in deprived areas	+/-/?	+/-/?	+/-/?	+/-/?	+/-/?
16. To reduce pollution to land through direct action or mitigation; to seek to improve the quality of the land as far as possible	+	+	+	+	+
17. To reduce pollution to air and reduce disruption from noise and vibration through direct action or mitigation measures; to seek to improve the quality of the air as far as possible	-/?	-/?	--/?	--/?	--/?
18. To ensure the Masterplan adapts to the effects of climate change (both now and in the future) and contributes to climate change mitigation, achieves greater energy efficiency and reduces its reliance on fossil fuels	-/+/?	--/+/?	--/+/?	--/+/?	--/+/?

## INFRASTRUCTURE

The London Docklands Development Corporation, before its departure in 1997, helped deliver a wide range of Infrastructure including the Limehouse Link Tunnel, Docklands Light Railway (DLR), Docklands Sailing & Water Sports Center, Arnhem Wharf Primary school, Tower Hamlets College (in Poplar), and the Island & Docklands Medical Centres. It also helped establish what we now call the East End Community Foundation as well as the Docklands Scout Project Centre at Dollar Bay. It provided sports facilities at George Green School, and the youth facilities and skateboard park at St Andrews on Westferry Road. In addition, it delivered new housing, jobs and Infrastructure. Yet, by being imposed on the community from above, it never received widespread public support.

We now wish to replicate the scale of that investment in transport, community, educational, youth, medical and other facilities through the Neighbourhood Plan and by working closely with the GLA, TfL & LBTH on the OAPF, but by ensuring that the voice of residents is listened to. Local people are best placed to know how, where and when public Infrastructure needs to be delivered.

The Jubilee Line at Canary Wharf followed in 1999, and the private venture Thames Clippers also launched in 1999. But except for some modest school expansion projects in St Lukes, Arnhem Wharf primary school and now Seven Mills school, there has been little investment since then, except for the Olympics inspired and funded DLR expansion to three carriages long. Only the arrival of free school groups, Canary Wharf College and City Gateway, has some new school capacity been created.

The one major Infrastructure investment today, the new Queen Elizabeth line (Crossrail), cannot itself solve the Infrastructure requirements of the Area, and will in fact encourage more development in the Area. It is enabling Canary Wharf itself to grow, encouraging even more development.

There have been two specific examples of a failure to build new Infrastructure in recent years. First, it has been LBTH policy since the year 2000 to deliver a second pedestrian bridge across South Dock to the east of the current over-capacity bridge. But, at the time of writing (October 2017), still no planning application has been announced. This is despite most planning consents for major developments south of the dock expressly relying on the bridge for access to Infrastructure in Canary Wharf on the north side of the Dock. It is also despite LBTH collecting S106 funds and mentioning the requirement in several plans for the area, starting with the Millennium Quarter Masterplan.

The second example was the agreement (as part of planning consents) in 2007 to build a new health facility in Cubitt Town (or perhaps expand Island Health) using £3 million of S106 money. Most of that money has in fact been spent in other parts of the Borough on greening areas.

The Millennium Quarter Masterplan in 2000 has also failed to deliver the vision outlined in the plan, according to residents involved in its public consultation.

This is not a new issue for the Isle of Dogs. When residents declared UDI in 1970, some of the reasons are very similar to issues today: a lack of investment in schools, transport and health facilities. But except for a period in the late 1980's when the Borough was managed on a local area partnership basis, planning has always been top down. There is not a lack of money. Tower Hamlets as at the end of September 2017 had:

- £88.3 million of S106 receipts in the bank
- £35.2 million of Community Infrastructure Levy in the bank (£77 million in total from approved developments)
- Earned over £127 million in New Homes Bonus (LBTH is the top recipient in the country).

## CONSTRUCTION DISRUPTION

An area with so much construction suffers from the following problems:

- Closed or narrowed pavements forcing pedestrians onto the road
- Closed or switched off pedestrian crossings forcing residents to cross roads unsafely
- Full or partial road closures
- Extra heavy traffic which causes:
  - Extra road traffic
  - Disruption especially as vehicles turn or U-turn
  - Blocked parking
- Noise from out of hours either 'emergency' works or LBTH allowed works
- Lack of communication about works causing frustration as residents are unaware over whether works were authorised or not
- Noise – cumulative impact from multiple sites
- Light pollution
- Vibration
- Dust
- Loss of parking and offloading spaces
- Lack of co-ordination between different developers

This is all exacerbated by the large number of developers working in such close proximity. At the London 2012 Olympics, the ODA imposed common rules about construction management and logistics with, for example, truck parks organised for waiting trucks. Even though we have as much development as occurred on the Olympic Park, we have no such co-ordination process. While we understand the OAPF may look at this issue in due course, construction management is already a serious issue for our specific Area.



Picture is of a wheelchair user being forced to wheel down Marsh Wall due to the partial closure of the footpath for construction of a new residential block.

## AFFORDABILITY CONCERNS

One development in the Area advertised the following prices (November 2016). These are off-plan prices (but will be before discount).

Type of property	Price range	Availability	
 Studio Suite	£577,500 - £617,500	<a href="#">2 available</a>	<a href="#">MORE DETAILS</a>
 1 Bed Flat	£736,000 - £870,000	<a href="#">6 available</a>	<a href="#">MORE DETAILS</a>
 2 Bed Flat	£970,000 - £1,310,000	<a href="#">8 available</a>	<a href="#">MORE DETAILS</a>

In the mid-nineties, early adopters who bought in Canary Wharf paid in the region of £85,887 for a flat, compared to £478,000 today, according to Hamptons International, representing a 457 per cent leap. This is broadly in line with the rest of Tower Hamlets which saw an increase from £84,400 in 1996 to £476,777 in 2016 according to Savills.

### **Rightmove House Prices - Average Price Report – Isle of Dogs**

In 2016, most property sales in the Isle of Dogs involved flats which sold for on average £475,934. Terraced properties sold for an average price of £765,401, while semi-detached properties fetched £682,500.

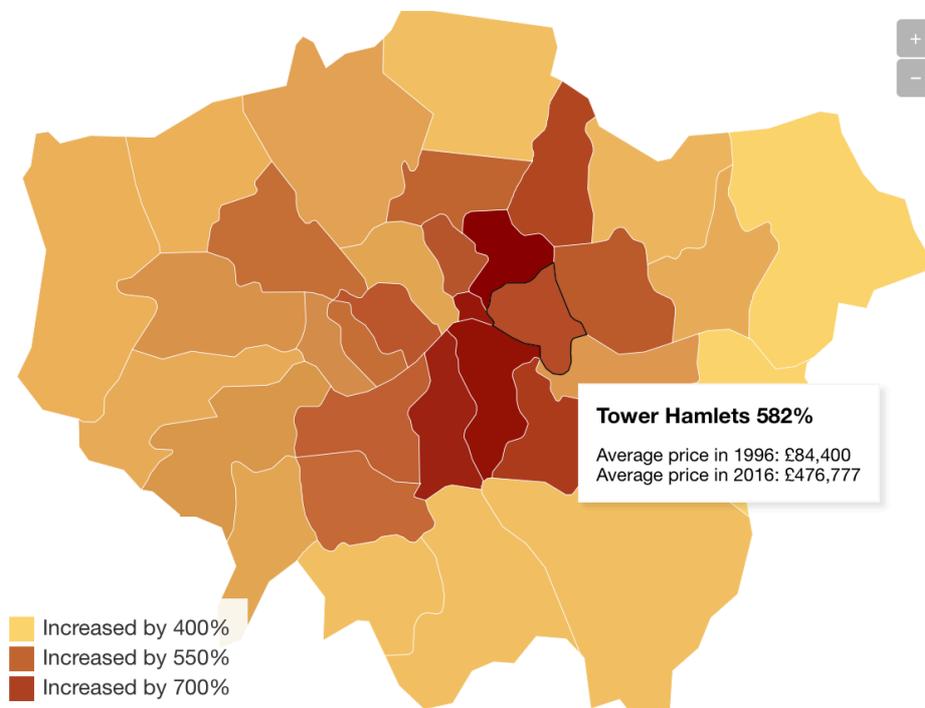
The Isle of Dogs, with an overall average price of £488,444, was similar in terms of sold prices to nearby Canary Wharf (£492,467), Millwall (£481,970) and Cubitt Town (£509,458). In 2016, sold prices in Isle of Dogs were 5% up on the previous year and 19% up on 2013 when the average house price was £411,366.

In 2016, most property sales in London involved flats which sold on average for £501,279. But as the graph below from Zoopla shows, we are still relatively cheaper than central London (W1 postcode) and London as a whole. This is one reason why apartments sell in the Area: we are 'cheaper' than central London, but close to it with our own major retail destination at Canary Wharf.



### London's 20-year house price growth

Hover over each borough to see how much property prices have increased between 1996 and 2016. Figures supplied by Savills



Source: London Evening Standard graphic

5

<sup>5</sup> <http://www.homesandproperty.co.uk/property-news/how-londons-property-market-has-changed-in-20-years-we-chart-average-house-prices-rental-trends-and-a106401.html>

DEPRIVATION

Contrary to external perceptions, the Isle of Dogs is not full of rich bankers but has levels of deprivation as high as anywhere else in Tower Hamlets, itself one of the most deprived boroughs in the UK. While we have high levels of income in certain areas, we also have low income areas. Due to building of mixed developments with social rent, affordable and private sale units in the same building, it is likely that income deprivation will continue to be present, albeit less visible by geographic area.

The following two heat maps shows the deprivation levels across Tower Hamlets for children and older people. They come from the Tower Hamlets Council Draft Local Plan. They clearly show that the Area has levels of deprivation as bad or worse than large parts of Tower Hamlets.

How planning can deal with these issues is intended to be a major focus of the Long Plan.

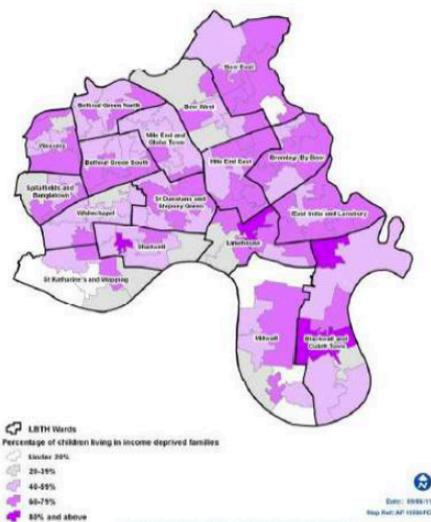


Figure 4: Percentage of children living in income deprived families, Source: Indices of Deprivation of Communities and Local Government, in LBTH, 2011.

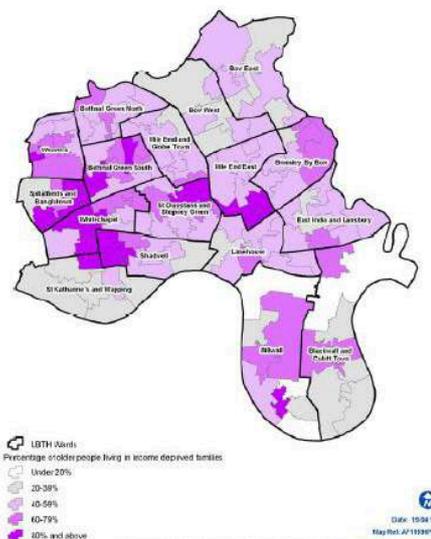


Figure 5: Percentage of older persons living in income deprived families. Source: Indices of Deprivation of Communities and Local Government, in LBTH, 2011.

## GEOGRAPHIC CONSTRAINTS

The Area is an island, with water on all sides. We only have the following access points connecting us to the outside world:

1. Blue Bridge – pedestrian, cycling and road access but two lanes only, no segregated cycle lane;
2. Greenwich foot tunnel – pedestrian and limited cycle access only – there are conflicts between pedestrians and cyclists who continue to cycle through the tunnel;
3. DLR tunnel between Island Gardens and Greenwich – DLR trains only;
4. River bus stop at Masthouse Terrace – river bus only;
5. Westferry Circus – pedestrian, cycling and road access – currently undergoing major construction related disruption;
6. DLR bridge – between South Quay and Canary Wharf – DLR trains only;
7. Footbridge across South Quay – pedestrian access only, already over-capacity according to TfL, inappropriate for cycling and even wheeled luggage and prams due to steps down at northern end;
8. A helipad at the Vanguard facility on Westferry Road.

While the Westferry exit appears to be solid, the road sits on top of the pipes which pump water into the docks via the pumping station between Westferry and Marsh Walls roads.

The DLR between Island Gardens and Heron Quays is the main public transport route in the Area.

The Area is further sub-divided by docks and large areas of greenery like Millwall Park and Mudchute Farm. This limits east-west connections making us very reliant on the following three key roads:

- A1206 – Manchester and Westferry Roads which loops around the island
- Marsh Wall – which connects the island east to west at the top of the island
- Eastferry / Limeharbour road which runs north to south up the middle of the island

Pepper Street bridge provides an additional east-west route for pedestrians, cyclists and scooters/motorbikes but not motor vehicles. All other roads are residential in nature. All roads have a 20mph speed limit. We have no dedicated cycle lanes and the Thames riverside path is blocked along large sections.

We have the following buses: 277, 135, D6, D7 & D8, but large parts of the Area are served by buses which travel towards Canary Wharf and its transport links on a clockwise basis, which results in longer journeys for those in the east of the Area.

Due to the rapidly growing density, limited roads and only two road access points, we increasingly need to ensure the following:

1. Everything needed for day to day to life should be within walking distance
2. How to bring in deliveries and remove rubbish in the most efficient manner
3. Key roads should perform as efficiently as possible with as few interruptions as possible to ensure smooth progress

## QUALITY OF LIFE ISSUES DUE TO LOSS OF INFRASTRUCTURE

We are not just suffering from a lack of new Infrastructure (which includes services) but we are experiencing a decline in existing Infrastructure despite ongoing population growth. For example, as at November 2016 we suffer from the following:

1. Inability at certain locations and times to get on public transport, whether DLR or buses;
2. The late 2016 changes to bus services purely involved moving bus routes around. There was no net increase in capacity in the wider Area e.g. swapping 277 for D3;
3. The temporary use of double-stack porta cabins in a former car park on Westferry Road for the second Canary Wharf College school, due to the delay in completing a permanent facility;
4. Loss of petrol stations on Leamouth roundabout and Burdett Road, and the expected loss of a petrol station at the ASDA site (leaving only one petrol station at Cotton Street in the E14 area);
5. Conversion of meeting rooms and ancillary facilities in GP surgeries into additional GP consulting rooms, due to a lack of new health facilities;
6. Loss of the Rainbow Playgroup next to Island Gardens due to the re-development of Calder's Wharf;
7. George Green Nursery closed due to building work, which never re-opened;
8. Recycling points at ASDA removed;
9. The use of Eastferry Road in the daytime as an HGV truck park (mainly construction vehicles), and at night by taxis due to lack of parking space elsewhere;
10. Enormous pressure on parking on certain roads especially at weekends and after 5.30pm weekdays, due to the increasing number of virtually car-free developments;
11. Unsafe crossing facilities, for example 40% of people crossing Marsh Wall do so at locations without safe crossings;
12. Sexual health clinic at the Barkantine Health Surgery moved to the Royal London Hospital in October 2016; the physio service had already moved out;
13. Risk of losing 8am to 8pm opening hours at the Barkantine Surgery;
14. Tower Hamlets Met Police leaving Limehouse police station for Bethnal Green station, leaving only SNT teams at the Isle of Dogs station. The Limehouse station will be used by SC&O19 Specialist Firearms Command which will have a pan-London role;
15. Isle of Dogs Police station: front desk only open 3 times a week for 1 hour at a time;
16. The temporary closure of the only 24-hour restaurant operation in the area with drive through access (should re-open but has been delayed by developer financing issues)
17. No public toilets in Island Gardens or on the south of the island;
18. Closure of pubs like The Pier Tavern on Manchester Road, and City Pride on Westferry;
19. Closure of youth centre provision at Alpha Grove Community Centre and Phoenix Heights;
20. Reduction in timetable of river bus stops at Masthouse Terrace;
21. Docklands Settlement on Eastferry Rd, which was replaced by a primary school but is still a loss of a community centre;
22. Future of Lanterns Dance Studio is not guaranteed;
23. and much else.

The Plan will not only need to deal with demand from new developments, but a retrospective catch-up as well. The picture below is of the porta-cabin school on Westferry Road.



The following table from the Draft Local Plan shows the deficit of GPs across Tower Hamlets over the next 15 years. It states there will be a deficit of 33.76 GPs by 2031. As a reminder, 60% of future growth will be in the south east of the Borough.

Only 14 GP spaces are currently planned in the Area: 9 at a new GP surgery in Wood Wharf, and the conversion of 5 meeting rooms at the Barkantine and Island Health facilities.

Table 12: GPs - Supply vs. Demand

Year	Provision (GP's - FTE)	Projected Population	Demand (GP's)	Deficit / Surplus	Deficit / Surplus (% of Provision)
2015/16	182.13	291,300	161.83	20.30	11.14
2020/21	182.13	325,100	180.61	1.52	0.83
2025/26	182.13	383,100	212.83	-30.70	-16.86
2030/31	182.13	388,600	215.89	-33.76	-18.54

The GLA DIFS has forecast we need between 4 and 6 new GP surgeries in the OAPF area.

We also will need at least 13 new schools (10 primary, 3 secondary) but only have the following sites identified;

- Canary Wharf College Glenworth primary – completed September 2017
- Wood Wharf Primary school – planning permission granted, construction underway
- Alpha Square primary school – planning permission granted, no work yet
- Galliard Millharbour primary school – planning permission granted, no work yet

- Westferry Printworks secondary school – planning permission granted, demolition started

That means we are short of eight school sites. The GLA DIFS has forecast we need between 15 and 20 new schools in the OAPF area.

#### 4. RELATIONSHIP TO OTHER PLANS

The Isle of Dogs is currently undergoing three separate planning processes and recently finished a fourth. They are in order of completion:

##### SOUTH QUAY MASTERPLAN

Lead Authority	Tower Hamlets Council
Current status	Approved October 2015
Area	Marsh Wall & South Quay – smaller than our Plan Area

##### Summary

The South Quay Masterplan is a Supplementary Planning Document (SPD) to help guide new development within the South Quay area over the next 10 years. The SPD was adopted on October 6, 2015, and is a material consideration in the determination of planning applications.

Location of documents;

[http://www.towerhamlets.gov.uk/lgnl/environment\\_and\\_planning/planning/planning\\_guidance/supplementary\\_guidance/south\\_quay\\_masterplan.aspx](http://www.towerhamlets.gov.uk/lgnl/environment_and_planning/planning/planning_guidance/supplementary_guidance/south_quay_masterplan.aspx)

##### TOWER HAMLETS COUNCIL DRAFT LOCAL PLAN

Lead Authority	Tower Hamlets Council (LBTH)
Current status	Regulation 19 consultation started October 2017
Area	Tower Hamlets – larger than our Plan area

##### Summary as at October 2017

LBTH is consulting on 'Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing the Benefits' which sets out a proposed vision, objectives and planning policies to positively plan and manage development in the borough up to 2031.

This is the third stage in preparing a new Local Plan and has been informed by both existing and updated evidence-based studies, national policy and legislation, as well as the feedback received during the initial public consultation between December 2015 and February 2016: and then the second public consultation between the 11th November 2016 and 2nd January 2017 on the 'Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing the Benefits'.

Completion is due by early 2019.

Tower Hamlets already has a Local Plan adopted in April 2013, but LBTH has decided to replace it with a new Local Plan. Work started towards the end of 2015.

Location of documents:

[https://www.towerhamlets.gov.uk/lgnl/council\\_and\\_democracy/consultations/past\\_consultations/Local\\_Plan.aspx](https://www.towerhamlets.gov.uk/lgnl/council_and_democracy/consultations/past_consultations/Local_Plan.aspx)

## ISLE OF DOGS & SOUTH POPLAR OPPORTUNITY AREA PLANNING FRAMEWORK (OAPF)

Lead Authority	GLA with support from TfL and LBTH
Current status	Working towards public consultation
Area	Isle of Dogs & South Poplar – four political wards of Canary Wharf, Poplar, Blackwall & Cubitt Town and Island Gardens

### Summary as at October 2017

The Isle of Dogs and South Poplar Opportunity Area Planning Framework (OAPF) aims to co-ordinate existing development pressure on the island whilst optimising housing and employment growth and securing the delivery of social and physical Infrastructure.

Drafts of the report have been seen by members of the Committee who have also been given access to a draft Development Infrastructure Funding (DIFS), but neither of these was in the public domain when this Neighbourhood Plan was completed.

Completion has been delayed several times with public consultation now due shortly. It is likely to be finalised in late 2018.

Location of documents:

<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/opportunity-areas/opportunity-areas/isle-dogs-and-south>

## CENTRAL ACTIVITIES ZONE SUPPLEMENTARY PLANNING GUIDANCE

Lead Authority	GLA
Current status	Published March 2016
Area	Northern Isle of Dogs

### Summary as at November 2016

It is worth mentioning the March 2016 release by the GLA of the Central Activities Zone (CAZ) Supplementary Planning Guidance, which includes the north of the Isle of Dogs as a part of the

Central Activities Zone of London (even if geographically distinct from the rest of the CAZ), as it specifically mentions the northern part of the Isle of Dogs as an area with unique policy treatment.

As the introduction says, planning for the CAZ requires striking a careful balance between its strategic functions – including business, culture, entertainment, shopping and tourism – and more local activities including housing. This document provides supplementary guidance on London Policies to ensure that the right balance is struck in different parts of the CAZ.



Location of documents:

<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/central-activities-zone>

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The final planning exercise is the Isle of Dogs Neighbourhood Plan. The decision to launch the Isle of Dogs Neighbourhood Planning Forum pre-dates the OAPF and the decision to re-write the Draft Local Plan.

It is also worth mentioning the Draft Millennium Quarter public realm guidance manual/street plan (2008) which is specific to a part of the Area.

The Millennium Quarter Masterplan (2000) was revoked on 6 October 2015 following adoption of the South Quay Masterplan. However, the draft Millennium Quarter Public Realm Guidance Manual (2008) will continue to be used to inform development across the South Quay area.

[http://www.towerhamlets.gov.uk/lgnl/environment\\_and\\_planning/planning/planning\\_guidance/supplementary\\_guidance/supplementary\\_guidance.aspx](http://www.towerhamlets.gov.uk/lgnl/environment_and_planning/planning/planning_guidance/supplementary_guidance/supplementary_guidance.aspx)

## 5. 'QUICK' PLAN AND 'LONG' PLAN

This Neighbourhood Plan will be a stand-alone Plan that will work with other planning processes currently underway.

However, the Isle of Dogs Neighbourhood Planning Forum decided to take an unusual approach. It is submitting this Neighbourhood Plan which we are describing as the 'quick' Plan, while in parallel working on a more detailed Neighbourhood Plan which will then replace this Plan, which we call the Long Plan. This is for the following reasons:

- i) A large number of planning applications are likely to be decided before a comprehensive Neighbourhood Plan is complete. To undertake a comprehensive plan process would probably mean missing the majority of the remaining applications due in the Area, like the revised ASDA and Skylines applications.
- ii) The delays in the Opportunity Area Planning Framework mean that, in order to have a fully integrated Plan, we would need to wait for the OAPF and again would fail to address major expected planning applications.
- iii) The sixteen-month delay between our applying to be recognised by LBTH and our eventual recognition, and the uncertainty of our status during that period, meant that we missed an opportunity to develop a Plan during 2015 and much of 2016, despite the demands on our Area growing rapidly due to continuing intensive development.

Brief history of the Forum:

- Forum formed September 2014
- Formal application to LBTH 1<sup>st</sup> December 2014 (only two application dates a year)
- Public consultation by LBTH between Monday 5th January 2015 and Monday 16th February 2015
- November 2015 LBTH proposed adding the rest of Poplar ward to the Forum Area (so as to align with the OAPF area). As no public consultation had taken place with approximately 7,000 residents in the additional area, and as the proposed additional area is separated by a major highway and has fundamentally different planning issues, the Forum rejected the proposed enlargement.
- March 2016 LBTH propose removing top third of applied for area.
- 5<sup>th</sup> April 2016, the Forum was formally recognised by LBTH, but with a smaller area than that applied for (the "Area" as defined in this Plan).

This helps explain why the number of policies in this quick Plan is relatively limited by comparison with other Neighbourhood Plans.

The policies in this Plan are those policies we need most urgently and which we believe cannot wait for the Long Plan. However, should the Long Plan not happen for any reason, this Plan has been designed to act as a stand-alone Neighbourhood Plan for the Area.

## 6. AREA AND NEIGHBOURING FORUMS

The Neighbourhood Plan Area was imposed on the Forum by Tower Hamlets Council on the 5<sup>th</sup> April 2016.

The exact boundaries of the Area therefore no longer align either with political ward boundaries, LSOA census areas, nor polling districts. The boundary also does not align with any other Tower Hamlets Council boundaries, for example LAP 8. It is a unique boundary not used previously for planning or other purposes (except ironically for the Unilateral Declaration of Independence by Cllr Ted Johns on the 1<sup>st</sup> March 1970).

As a result, polling district Canary Wharf 1 has been cut in half. The Independent Examiner may wish to extend the referendum area as a result, since the residents living in the removed area are members of the Forum (as constituted) and are affected by the Isle of Dogs Neighbourhood Plan. We know Democratic Services at Tower Hamlets Council are concerned about administering this split.

This has also complicated the task of data analysis and planning as our major transport, retail, service and entertainment centres lie outside the revised Area. We therefore continue to run calculations on the original area in order to align with census data, and then extract as a sub-set data for the revised Neighbourhood Plan Area.

The revised Area boundary, although neat, does not reflect the reality of daily life on the Isle of Dogs.

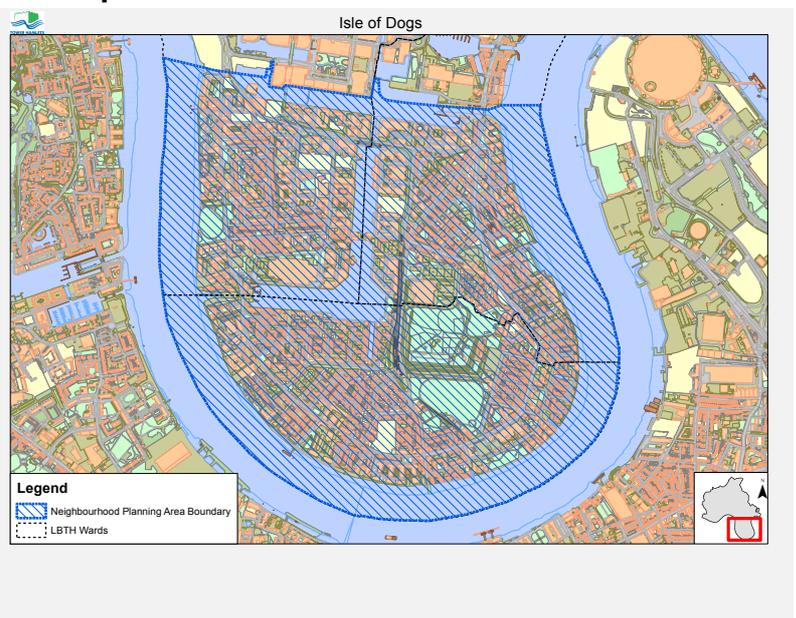
Neighbouring areas are now considering setting up their own Neighbourhood Planning Forums.

The following maps show the Forum area and the revised Plan Area:

### Original Area Application - 1<sup>st</sup> December 2014



### Approved Plan Area - 6<sup>th</sup> April 2016



## 7. VISION AND OBJECTIVES

Residents have agreed the following vision statement with objectives, as a guide to what we are trying to achieve.

Some of these objectives will not be deliverable by the Neighbourhood Plan on its own (they are not policies as such).

It is possible that the delivery mechanism for the other objectives will in due course be a Parish Council for the Isle of Dogs (see chapter 10).

### **“A liveable environment in which our diverse community can work, rest and play”**

“We the people of the Isle of Dogs believe that our island is a great place to live and work, but it is undergoing enormous change. We have come together to form a Neighbourhood Planning Forum for the Isle of Dogs to work collectively to produce policies which will guide the future development of our area.

The Isle of Dogs is more than just a dormitory for Canary Wharf. It should be a destination in its own right, with everything people need on a daily basis within walking distance, and where we can imagine living at all stages of our lives.

Our vision is of a relaxed, quiet, safe and secure home, that has the best of London on its doorstep, but uses its island location to create something unique and special. We want to maximise enjoyment of our very special access to the river and docks, and enhance our green spaces. Our plans should work equally well for all residents regardless of age, income or other characteristics, and at any time of the day or night. We need to plan for the whole area to work together seamlessly.

Given the enormous scale of development making our island the tallest and most densely packed residential area in western Europe, we need a Plan that will ensure a high quality of life for all residents and workers: both those already here and those still to come, with any re-development plans for existing homes fully involving the communities who live there, empowering them to make active choices about their future.

Core to this is the need for proposed developments that exceed the London Plan’s maximum recommended density only to be permitted after all the infrastructure and services needed to support them and all the other developments nearby have been specifically identified and guaranteed. Otherwise our island will become un-liveable: contrary to the interests of existing and prospective residents, of local businesses and their workers, and of developers.

The Isle of Dogs is a unique place requiring unique solutions, and we have the following key objectives (these are not though Neighbourhood Plan policies).

- a) Sustainable development that works for those already here, as well as for future residents and workers.
- b) Infrastructure that is planned and delivered in advance of development, and is sized to cope with all future likely development, and is not delivered incrementally and in isolation.
- c) Policies that address the construction process as well as afterwards.
- d) A safe and secure environment which works for all age groups who live and work in our area.
- e) A cohesive community that brings people together from across the island.
- f) Indoor and outdoor spaces for people to enjoy, which are open to the public to use, including space where children can play and everyone can relax.
- g) An environment that works for everybody at different stages of their life; that works equally well for the disabled, the young and the old; and caters to the different interests we have.
- h) Ensuring that everything people need is within safe walking distance.
- i) Quick, efficient and free-flowing transport options – whether cycling, walking, buses, DLR, boats or cars – all working together.
- j) Affordability of homes, living, businesses and leisure should be factored in at every stage.
- k) A healthy, clean, and relaxed environment where it is easy and safe to exercise.
- l) A mixture of different types of development: not just residential, but also offices, small businesses, creative spaces and independent retailers.
- m) Exploit the best of new technologies to make our lives easier and safer especially some of the new Smart Cities technology out there and ensure we have the networks to support growth.
- n) Our Plan should work equally well at any time of the day or night, and on any day of the week.
- o) When proposals come forward to replace existing residential buildings, existing residents should be fully involved in the decision-making process, with their rights protected, ensuring they have real choice and the ability to stay in their area.
- p) Preservation of the assets we already have, including our docks, river access, historic buildings, green spaces, play areas and community facilities.
- q) Plan for the long-term delivery and execution of our vision once the Neighbourhood Plan has been delivered, which may include new forms of governance.
- r) Work closely with neighbouring Forums to ensure our plans are synchronised.
- s) Beauty In My Backyard (BIMBY): not anti-development (NIMBY).
- t) Work collectively with Tower Hamlets Council, the GLA, Transport for London, developers and other stakeholders to deliver our vision for the long term. It is in all of our best long term interests that the Island continues to function.

## 8. POLICIES

This chapter 8 (and only this chapter) includes the legally enforceable policies which form the basis of the Neighbourhood Plan. They are identified by being in **Blue bold font**.

It also includes explanations, justifications and guidance to planners.

We also make some recommendations which are in **green font**, as indications to our stakeholders those subjects we, as a community, wish to recommend to them, but which do not constitute legally enforceable Plan policies.

This Plan will be in place until the 31<sup>st</sup> December 2031 (unless and insofar as it is not replaced by the Long Plan) in order to align with the Draft Local Plan.

Immediately below is a summary for information only, and does not constitute the Plan Policies.

The definitions in the Glossary of Terms apply equally to this chapter as to the other parts of this document.

### Density

**D1 – Density and Infrastructure.** Applications for developments at levels above the maximum recommended densities in the London Plan should only be approved if supported by sufficient Infrastructure to sustain the increase in population in the Area. Strengthens the GLA's Housing SPG recommendations on density.

### Community Infrastructure Levy

**CIL1 – Neighbourhood Pot.** Ensuring that at least 25% of CIL is available for the Area.

**CIL2 – CIL for long term community financing.** CIL to be invested to support the community long term.

**CIL3 – CIL to project manage Infrastructure projects.** CIL to be spent helping to write the Long Plan and to pay for projects required to support development.

**CIL4 – All CIL for the Area.** All CIL generated in the Area should be spent here.

### Estate regeneration

**ER1 – Right to vote to approve or reject final proposals**

**ER2 – Conduct of elections**

**ER3 – Resident participation in a transparent, inclusive, objective decision making process**

**ER4 – Right of return**

**ER5 – Tenants rights and costs**

**ER6 – Leaseholder and freeholder rights**

**ER7 – Estate small businesses, retailers, and community organisations**

**ER8 – Public profit reinvestment****Empty sites**

**ES1 – Use of empty sites.** Encourage developers to release empty land on a temporary basis for community use (e.g. as a pocket park, market, etc.) pending the start of construction.

**Grandfathering new residents' associations**

**GR1 – Helping establish new residents' associations.** Developers to help new large developments establish residents' associations from the outset.

**3D Model**

**3D1 – 3D model for planning.** Encourage more effective planning using 3D models.

**3D2 – 3D model for applications.** Developers to use 3D modelling in their applications.

**Broadband Access**

**BBA1 – Fibre to the premises.** New developments to have high quality broadband.

**BBA2 – Broadband choice.** New developments to have resilient broadband.

**BBA3 – Mobile network resilience.** New developments should not impact mobile phone networks

**Construction Management and Communication**

**CC1 – Construction coordination.** Developers to consult the community before finalising a construction management plan.

**CC2 – Construction communication.** Communication with local residents and other stakeholders before changing normal working hours and methods.

**CC3 – Control of dust and emissions during construction and demolition**

**Sustainable Design**

**SD1 – Sustainable Design.** Planning applications should include pre-assessments demonstrating how BREEAM standards (or any future replacement standards) will be met.

**Air Quality**

**AQ1 – Air Quality.** Minimising adverse air quality impact of planning and development.

**8.1 POLICY – DENSITY AND INFRASTRUCTURE****D1 – DENSITY AND INFRASTRUCTURE**

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- 1) To support Sustainable Development and in view of the strain on Infrastructure in the Area and the shortage of publicly owned land, applications to develop hotels, or for residential developments exceeding 1,100 habitable rooms per hectare in locations with a PTAL of 5 or less, shall only be approved after all the Infrastructure needed to sustain the population in the Area generated by the proposed development and all existing and approved developments, has been specifically identified by the relevant planning authority and guaranteed to be put in place. Such Infrastructure should reflect the character, accessibility and Infrastructure of the area, and must be evidence-based which may include reference to relevant public authority regulations and policies. Applications must make it clear how, where and when such Infrastructure will be supplied, whether by the relevant developer or by others. Payment of CIL or other financial contributions by developers without such specific Infrastructure identification and guarantees is insufficient.
  
- 2) Subject always to the broad principle in Policy D1(1), to support Sustainable Development such developments shall where feasible include new community facilities incorporated into, or within reasonable walking distance of, the development site. Such facilities – subject to demand anticipated at the time of the application and established by reference to relevant public authority regulations and policies – should in principle include one or more of the following as determined by the relevant planning authority, and be proportionate to the scale of the proposed development:
  - a) A secondary school; a primary school; education and training facility or a large nursery D1 use class
  - b) Key Sector employee housing C3 use class
  - c) A publicly accessible MUGA; sports facility; or a public swimming pool D2 use class
  - d) An NHS health facility D1 use class
  - e) A police station D1 use class
  - f) A fuel station for vehicles Sui Generis use class
  - g) A community and cultural centre (minimum 400 square meters) D1/D2 use classes
  - h) A Scout or other youth facility D1/D2 use classes
  - i) A bridge landing point
  - j) A mobile phone base station or other telecoms infrastructure to support mobile data access
  - k) A fire brigade station
  - l) An ambulance station
  - m) Other Infrastructure where agreed to by LBTH and the Forum

- 3) Delivery of such Infrastructure may be achieved by coordination with other development sites where appropriate, but must be specifically identified by the relevant planning authority and guaranteed to be put in place. The Forum must be included as a consultee on draft conditions and heads of terms for, and as a party to, any s106 agreement.
  - 4) Planning applications for such developments shall specify how they conform to the GLA's Housing SPG, updated in May 2016 or any successor or replacement guidance, including an explanation of how they are exceptional, and not only that they are of exceptional design.
- 

### Explanation:

The latest version of the SPG (as at July 2017) is in favour of high density in targeted areas, but still exceptional and subject to local conditions, which is where this Plan is relevant.

- 1) Design and build standards should as a minimum be generally compliant with the London Housing Supplementary Planning Guidance (SPG) or any revision of it, in particular policy 1.3.50, 1.3.51 and 1.3.52 set out below.
- 2) The Long Plan will include clear design expectations. For the purposes of this Plan, the use of nationally accepted design codes is strongly encouraged.

Developments above the density ranges

1.3.50 The London Plan and this SPG confirm that it is not appropriate to apply Table 3.2 mechanically and advise that the density ranges should be considered as a starting point rather than an absolute rule when determining the optimum housing potential of a particular site. As confirmed in Section 1.1, meeting London's housing requirements will necessitate residential densities to be optimised in appropriate locations with good public transport access. Consequently, the London Plan recognises the particular scope for higher density residential and mixed use development in town centres, opportunity areas and intensification areas, surplus industrial land and other large sites. In addition, the Plan confirms that the Housing SPG will provide general and geographically specific guidance on the justified, exceptional circumstances where the density ranges may be exceeded.

1.3.51 In appropriate circumstances, it may be acceptable for a particular scheme to exceed the ranges in the density matrix, providing important qualitative concerns are suitably addressed. However, to be supported, schemes which exceed the ranges in the matrix must be of a high design quality and should be tested against the following considerations: the factors outlined in Policy 3.4, including local context and character, public transport capacity and the design principles set out in Chapter 7 of the London Plan:

1. the location of a site in relation to existing and planned public transport connectivity (PTAL), social Infrastructure provision and other local amenities and services;

2. the need for development to achieve high quality design in terms of liveability, public realm, residential and environmental quality, and, in particular, accord with the housing quality standards set out in Part 2 of the SPG;
3. a scheme's overall contribution to local 'place making', including where appropriate the need for 'place shielding';
4. depending on their particular characteristics, the potential for large sites to define their own setting and accommodate higher densities;
5. the residential mix and dwelling types proposed in a scheme, taking into account factors such as children's play space provision, school capacity and location;
6. LBTH cycle parking facilities; and
7. whether proposals are in the types of accessible locations the London Plan considers appropriate for higher density development (e.g. town centres, opportunity areas, intensification areas, surplus industrial land, and other large sites).

1.3.52 Where these considerations are satisfactorily addressed, the London Plan provides sufficient flexibility for such higher density schemes to be supported. It should, however, be recognised that this is not an exhaustive list and other more local or site specific factors may also be given appropriate weight, taking into account the particular characteristics of a proposed development and its impact on the surrounding area.

### Justification

As Sir Ed Lister, the then Deputy Mayor of London said in the introduction to the first draft of the South Quay Masterplan:

*"Located within the Isle of Dogs Opportunity Area, South Quay is an area capable of substantial change, with the potential to deliver significant and much-needed housing growth. However, it is vital that this growth is captured and delivered in a planned, sustainable and responsible way. It is essential that we secure the comprehensive delivery of high-quality public realm, accessible open spaces, and active and well-designed streets, with excellent legibility and permeability. Exceptional residential quality is also paramount given the unique and high-density nature of emerging proposals. The necessary social infrastructure must also be delivered to support and realise this growth."*

The necessary social Infrastructure can only be delivered locally within walking distance. A number of approved developments in the Area or the wider OAPF area have already delivered on-site Infrastructure, for example:

Alpha Square – a new state school plus extra D1 space for a small GP surgery  
 Wood Wharf – new school, GP surgery, Idea store, parks  
 Galliard Millharbour Village – new state school, new park  
 Westferry Printworks – new state secondary school, pontoon for the sailing centre, new park, additional D1 space

The draft Local Plan 2031 site allocations which have been tested for viability make clear that a number of sites on the IoD can provide large amounts of Infrastructure on-site.

But LBTH is limited in its ability to deliver new Infrastructure because there is little publicly owned land in the Area outside of the GP surgeries, schools and parks. The main exceptions are:

- Jack Dash House, Lawn House Close – Council offices (to be sold to fund the new civic centre)
- 107 Mellish Street porta cabin – former NHS GP surgery, now a community centre
- Cubitt Town Library Grade 2 listed
- Tiller Road Leisure Centre
- Isle of Dogs police station
- Docklands Sailing Centre and the slipway opposite into the river Thames

Except for the Mellish Street site (which is a small site) none can be easily developed to provide new Infrastructure (and some should not be developed at all). This is another reason why we are looking at floating solutions in the docks and river as the only way to make ‘new’ land.

The GLA’s Development Infrastructure Funding Study (DIFS) document makes clear the scale of Infrastructure required. The full DIFS will be added as an appendix when publicly available as it will greatly strengthen the evidence base behind this policy.

The following table compares the DIFS infrastructure information (available at the time of submission) to infrastructure with planning permission, to the Local Plan site allocation requirements (based on Reg 19 consultation). This lists new infrastructure required for three different DIFS growth options – High, Medium, Low i.e. low growth requires 10 new primary schools.

Infrastructure	DIFS Options			With Planning Permission Oct 2017	Local Plan 2031 Site Allocations: Reg 19 >
	Low growth DIFS	Medium growth DIFS	High growth DIFS		
Primary school	10	12	14	4 *	8
Secondary school	5	6	6	1 Westferry Printworks	2
NHS GP Surgery	4	5	6	1 at Wood Wharf	5
Sports Halls	3	4	5	None	0
Open Space	Yes	Yes	Yes	Some	Yes
Community Hub	1 or 2	1 or 2	1 or 2	1 Idea store at Wood Wharf	2 (1 hub, 1 Idea)
LBTH Archives	Part	Part	Part	None	0
Police Station	1	1	1	None	0
Fire Station	1	1	1	None	0
Ambulance Stn	Part	Part	Part	None	0

\* Primary school – Millharbour Galliard, Alpha Square FEC, Wood Wharf, Glenworth CWC (Complete Sept 2017). Skylines planning application includes another school.

> Note that Local Plan site allocations include sites already with planning permission so you cannot add the 'With Planning Permission' to the Site Allocations total, they are a subset

As can be seen there is a large gap between the infrastructure required according to the GLA, infrastructure with planning permission as at October 2017 and the infrastructure required in the draft Local Plan Regulation 19 version.

Policy D1 will help fill that gap by encouraging all sites to look at how they can supply the infrastructure required.

The numbers are based on the OAPF area which is larger than the Plan Area and for a different time period (OAPF is 25 years, Local Plan and NP 15 years) but prove the scale of infrastructure required.

The LBTH Local Plan housing targets are very similar to the DIFS Medium Growth option if you look at the phasing of new homes in the DIFS.

A concern is that individual applications are coming forward within site allocations but which are not providing the infrastructure set out in the Local Plan due to their smaller size or because applications were approved before the Local Plan is in place.

For example, The Madison and 225 Marsh Wall are in the Marsh Wall East site allocation but neither intended to provide a school or GP surgery as required in the site allocation (225 Marsh Wall application was recently rejected though).

Millharbour only has two plots left on which to develop. The current Meadows planning application is not providing a health centre. The City Gateway site will therefore be the only site on which the health centre can be provided but it maybe years before the site is developed.

As a result, the 'final' sites to be developed in each site allocation may end up having to deliver a lot of infrastructure to make up for earlier omissions. That may make some sites unviable. Policy D1 spreads the infrastructure load more widely to ensure development is sustainable.

Below is a summary of the site allocations in the OAPF area (\* indicates sites outside of the NP Area).

# ISLE OF DOGS NEIGHBOURHOOD PLAN

<b>Site Allocations Local Plan Reg 19 in OAPF area</b>	<b>Wood Wharf *</b>	<b>Westferry Printworks</b>	<b>Riverside South *</b>	<b>Reuters *</b>	<b>North Quay *</b>	<b>Millharbour</b>	<b>Millharbour South</b>
Housing	Yes	Yes	25% only	Yes	25%	Yes	Yes
Employment	Yes	Re-provision	Yes	Re-provision	Yes	Yes	Yes
Open Space	1 hectare	1 hectare	0.4 hectare	0.4 hectare	0.4 hectare	0.4 hectare	0.4 hectare
Primary school	1			1		1	1
Secondary school		1					
Community/Idea	1						
Health	1					1	1
Leisure		Re-provision					
Size hectare	7.26	6.16	2.17	2.71	3.27	3.58	4.09
<b>Site Allocation</b>	<b>Marsh Wall West</b>	<b>Marsh Wall East</b>	<b>Limeharbour</b>	<b>Crossharbour</b>	<b>Billingsgate *</b>	<b>Aspen *</b>	<b>Total</b>
Housing	Yes	Yes	Yes	Yes	25% only	Yes	
Employment	Yes	Yes	Yes		Yes	Yes	
Open Space	0.4 hectare	0.4 hectare	1 hectare		0.4 hectare	1 hectare	<b>7.2</b>
Primary	1	1	1	1			<b>8</b>
Secondary					1	Re-provision	<b>2</b>
Community / Idea				1		Re-provision	<b>1 + 1</b>
Health	1	1		Re-provision			<b>5</b>
Leisure							<b>0</b>
Size hectare	6.39	3.42	4.87	4.89	5.74	6.1	<b>60.65</b>

Because LBTH cannot easily acquire new land for new Infrastructure, increasingly that new Infrastructure must be provided by developers as part of new developments, either on-site or close by.

Being a geographically constrained Area with water on four sides and limited transport links northwards, we cannot rely on Infrastructure outside the Area, particularly that which can only be accessed via public transport which is itself already very heavily used (especially at peak times carrying people to and from work).

Development cannot continue without supporting Infrastructure inside the Area or to its immediate north but within the OAPF area.

### **NPPF Support**

This policy is at the heart of the principle of Sustainable Development. Development in a geographically constrained area is not possible unless the Infrastructure required is supplied within the Area or within walking distance.

This is supported by Paragraph 38. *“For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.”*

Given the size and density of developments on the Isle of Dogs, key facilities should all be within walking distance. That limits key facilities to being delivered within the OAPF area.

### **Guidance to Planning Committee**

In summary unless the Committee feels that the development in question supports the cumulative supply of Infrastructure required locally then it should be rejected. Development can only be sustainable if it does not worsen the required Infrastructure to support development.

The Committee must be satisfied that it knows how and where that new Infrastructure will be provided and is secure.

The GLA’s DIFS document provides a detailed list of the Infrastructure required by five-year period over the next 25 years. This will provide a good guide as to how much Infrastructure is required to be delivered and includes the following categories:

- Primary and secondary schools
- Health surgeries
- Sports halls
- Open space
- Community hubs
- Part of archives
- Police station
- Fire station
- Ambulance station

**8.2 POLICY – COMMUNITY INFRASTRUCTURE LEVY (CIL)****CIL1 – NEIGHBOURHOOD POT**

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To support Sustainable Development in the Area, the Neighbourhood Pot shall be spent on or invested in projects identified in this Plan to address the demands that development places on the Area.

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**Source:**

National Planning Guidance – Guidance on the operation of CIL.

Updated: 16 11 2016

<http://planningguidance.communities.gov.uk/blog/guidance/community-infrastructure-levy/spending-the-levy/>

**Explanation:**

As the Forum has been officially recognised, 15% of CIL from developments in the Area is known as the Neighbourhood Pot, the neighbourhood portion of the levy that can be spent on a wider range of things than the rest of the levy, provided that it meets the requirement to ‘support the development of the area’. It increases to 25% of CIL from developments approved after this Plan is adopted.

Paragraph: 072 Reference ID: 25-072-20140612 of National Planning Guidance

*“The use of neighbourhood funds should therefore match priorities expressed by local communities, including priorities set out formally in neighbourhood plans.... This should include working with any designated neighbourhood forums preparing neighbourhood plans that exist in the area.”*

**Justification:**

As the fastest growing place in the UK, the community will have a wide range of projects that it will wish to invest in to improve the Area. It is essential that the Neighbourhood Pot is used only for that purpose unless otherwise agreed by the community through a Neighbourhood Plan.

**Draft Local Plan:**

No comment or policy in the Draft Local Plan can be found although an LBTH Cabinet paper describes how the LBTH Cabinet believes this pot should be spent.

**NPPF Support**

Paragraph 175 says *“Where practical....The Community Infrastructure Levy should support and incentivise new development, particularly by placing control over a meaningful proportion of the funds raised with the neighbourhoods where development takes place.”*

## CIL2 – LONG TERM COMMUNITY FINANCING

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As long term community financing is an LBTH neighbourhood CIL priority, and to support Sustainable Development in the Area, a fixed percentage of the Neighbourhood Pot will be invested to generate a financial return that can be used as ongoing grants to support local community organisations in the Area. The fixed percentage will initially be determined by the Forum following community consultation and in consultation with LBTH, and subsequently both the percentage and the grant awarding process will be ratified at the Forum's Annual General Meetings.

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**Source:**

See CIL1

**Explanation:**

CIL is usually a one-off capex type spend, but the Neighbourhood Pot can be spent to 'support the development of the area'. If for example the community builds a new community centre with CIL, it will also need to fund its operation longer term.

**Justification:**

S106 funds have been granted to organisations like the East End Community Foundation, based on the Isle of Dogs (Rich Mix is another example in Tower Hamlets). They have invested the money and then in subsequent years paid out grants using the income from that investment.

The East End Community Foundation was similarly set up by a grant from the London Docklands Development Corporation. We are copying the logic of these previous grants but applying it to CIL.

We cannot set that fixed percentage in advance of the GLA's DIFS being completed, as that will help determine the funding available. The DIFS will make clear how much funding is required and the funding gap that exists.

**Draft Local Plan:**

No comment or policy in the Draft Local Plan can be found, but other Neighbourhood Plans are doing the same.

### CIL3 – CIL TO PROJECT MANAGE INFRASTRUCTURE PROJECTS

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To support Sustainable Development in the Area, CIL generated in the Area may be used to develop the Long Plan that is intended to enhance and replace this Plan in order to address the detailed demands that development places on the Area.

This CIL (up to 15% of the total CIL generated in the Area) may also be used to pay for the management and delivery of projects in the Area identified by the GLA, TfL, LBTH and/or the Forum to address the demands that development places on the Area. CIL may be spent on or invested in the following (although where appropriate other sources of funds should also be used including New Homes Bonus), which may include but not be limited to:

1. Project managers to deliver projects in the Isle of Dogs and South Poplar OAPF area
2. 3D models
3. Water management strategy (Thames Water)
4. Air quality monitoring
5. Waste and recycling management strategy, including analysis on an Envac solution (the Swedish underground vacuum tube extraction system)
6. Transport, freight delivery and last mile delivery strategy
7. Public realm strategy
8. Communications and connectivity
9. Security and policing
10. Stock conditions survey of Estates
11. Options appraisal of Estate
12. Advice and support to residents in Estate regeneration
13. Construction management
14. Any other project-related spend that supports planning for the growth of the Area.

These meet the requirements to support the Sustainable Development of the Area. Spend on or investment in projects can only be by agreement between LBTH and the Forum and should take place after appropriate consultation has taken place on the scope of the project.

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**Source:**

National Planning Guidance - Guidance on the operation of the Community Infrastructure Levy.  
Updated: 16 11 2016 Paragraph: 072 Reference ID: 25-072-20140612

*“Areas could use some of the neighbourhood pot to develop a [neighbourhood plan](#) where it would support development by addressing the demands that development places on the area.”*

Paragraph: 078 Reference ID: 25-078-20140612

*“The neighbourhood portion of the levy can be spent on a wider range of things than the rest of the levy, provided that it meets the requirement to ‘support the development of the area’”*

Paragraph: 079 Reference ID: 25-079-20140612

*“Where a neighbourhood plan has been made, it should be used to identify these priorities.”*

Paragraph: 072 Reference ID: 25-072-20140612

*“The use of neighbourhood funds should therefore match priorities expressed by local communities, including priorities set out formally in neighbourhood plans.... This should include working with any designated neighbourhood forums preparing neighbourhood plans that exist in the area.”*

<http://planningguidance.communities.gov.uk/blog/guidance/community-infrastructure-levy/spending-the-levy/>

### **Explanation:**

LBTH may lack the human resources to deliver all the projects required and identified by the GLA, TfL, its own Local Plan and the Neighbourhood Plan. The London Docklands Development Corporation delivered projects because it was dedicated to a specific area and had dedicated resources.

There is not a single person at either LBTH, GLA or TfL dedicated to the Isle of Dogs. There are two GLA staff working on the OAPF but they are not full time. By contrast Old Oak Common has 50 GLA staff yet the Isle of Dogs is delivering twice as much new development and is the 3<sup>rd</sup> most important economic area in the UK.

This policy therefore provides that LBTH use some of the CIL monies already received to employ project managers and other dedicated staff to be based in the Isle of Dogs and South Poplar OAPF area or to be dedicated to that area. Those project managers will be dedicated to assisting in the delivery of projects identified by LBTH, TfL, GLA and the Forum.

Those CIL funds can also be used to pay for external assistance and consultants required in the delivery of those projects and the Long Plan.

### **Justification:**

It is clear that the next phase of development of the Isle of Dogs will require a significant spending of public funds, and it is beyond the current capacity of LBTH to deliver all of those projects in a timely manner. There is also a material risk that S106 funds will not be spent within the seven years required under S106 rules.

With £23 million pounds of CIL having already been received by LBTH from developments in the Area (as at January 2017) the cash exists to fund these projects.

## CIL4 – ALL CIL TO BE SPENT IN THE AREA

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As LBTH and GLA have determined that the cost of new Infrastructure needed to support Sustainable Development in the Area will exceed all the CIL likely to be generated in the Area, the remaining CIL (in addition to the Neighbourhood Pot) shall be spent on or invested in projects inside the Area which address the demands that development places on the Area. Unspent S106 earned in the Area should also be spent or invested in the Area given the population and Infrastructure demands on the Area.

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### **Explanation:**

The GLA has produced a Development Infrastructure Funding Study document which has identified the scale of the publicly acknowledged gap between Infrastructure available today and that required in the future. The draft document shows a clear and substantial (in the hundreds millions of pounds) funding gap between any likely projection of Infrastructure requirements and the funding required to provide them.

### **Justification:**

CIL has never been intended to fulfil all of the Infrastructure spending required for an area, especially not one with as many Infrastructure demands as this Area. The Area has also seen a historical underspend of S106. As a result, the Area has already accumulated a long list of existing Infrastructure needs: not just those required to cope with future development.

The Draft Local Plan has identified a £640 million funding gap between the Infrastructure needs of Tower Hamlets as a whole and the likely income over the next 15 years. LBTH therefore does not have enough funding to provide for all of its Infrastructure needs, and therefore must focus CIL & S106 spending on those areas undergoing the greatest and most intensive development, especially the Isle of Dogs.

The DIFS also identifies a funding gap in the hundreds of millions.

This will encourage other communities in Tower Hamlets to encourage development in their own area if they want additional Infrastructure spending in their area.

It is not sustainable for the 3<sup>rd</sup> most important economic area in the UK to be starved of the funds it needs to develop.

### 8.3 POLICY – ESTATE REGENERATION

#### **Why Estate Regeneration Policies support the principle of Sustainable Development**

The Area includes many housing association managed Estates, some of which were built some decades ago. The question of their long-term future is therefore a live subject on the Isle of Dogs, not least the Project Stone related consultation underway on the future of the four Estates managed by One Housing Group: Barkantine, St Johns, Samuda and Kingsbridge. The policies in this Plan apply to all estates with a single landowner and not just the four Estates currently under consultation.

One option for the future of estates is complete demolition and rebuild. But Estate regeneration has a very poor and negative reputation in London due to a number of issues with previous such projects. As a result, Estate regeneration has attracted high levels of opposition and legal challenge. The policies in this Plan do not restrict the possibility of future legal challenges, but are intended to ensure that any change to the Estates has broad support in advance of any change. The more involved local communities are in changes to their homes, the more sustainable that development is. The policies in this Plan are therefore designed to promote Sustainable Development.

An important element of that broad support is to have quite specific policies on issues like the voting process, as that helps build trust and support even if they do not typically fit classic land use policies.

*“Neighbourhood planning can inspire local people and businesses to consider other ways to improve their neighbourhood than through the development and use of land. They may identify specific action or policies to deliver these improvements. Wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non-land use matters should be clearly identifiable.”*

Neighbourhood Planning Guidance Paragraph: 004 Reference ID: 41-004-20140306

All policy guidance and landlords recognise the need for Estate redevelopment to have the support of the majority of residents. The Forum supports independent secret ballots as by far the most credible and fair way of assessing resident support, because the alternative ‘independent’ surveys – as samples based on one-to-one interviews - are less inclusive than elections.

With surveys, landlords are also more likely to be able to consult at short notice of their choosing, and control information given to residents beforehand and the format of questions. Fair elections avoid the possibility or perception of the organisation carrying out the survey being influenced by the landlord, enabling more trust in the result – a crucial benefit for all parties and therefore critical to the sustainability of the proposed development.

An election campaign also allows any groups opposed to proposals (who do not have the same resources as landlords) to put their case during a publicised period notified well in advance. Election campaigns also traditionally facilitate hustings events where residents can listen to all

arguments and points of view, and ask questions of all sides – vital elements. There is no record of surveys allowing such impartial, collective engagement and debate. The case of Central Hill in Lambeth illustrates all these points.

All of the policy principles we detail below have already been used by other Estate regenerations in Tower Hamlets, most notably New Union Wharf Estate regeneration in the Area (which voted to support Estate regeneration), so we know they are viable and practicable policies already used in practice.

It also directly relevant that when the estates were transferred from the control of Tower Hamlets Council to individual housing associations that there was a ballot of residents to approve the transfer. The principle that residents should vote on the future of their estates is already in statute.

This explanation applies to policies ER1 to ER7

### **NPPF Support**

Estate regeneration is not specifically mentioned in the NPPF and barely mentioned in the London Plan, even though it is an obvious source of new homes. But it cannot be Sustainable Development to propose to knock down people's homes without a guarantee that they will get a replacement home of equal or better quality, that they will not be financially worse off, and that they cannot stay in the Area subsequently.

There is evidence from some existing estate regeneration schemes in London where existing communities were displaced and fragmented by re-development of their homes. Most notably at Heygate where the most evidence has been gathered about displacement (see link below). This a direct contradiction of various elements of the NPPF as they relate to sustainable communities. Development should not destroy a community but provide new or refurbished homes.

<http://heygateshome.org/displacement.html>

### **Estate Regeneration National Strategy**

In December 2016 DCLG released the Estate Regeneration National Strategy.

<https://www.gov.uk/guidance/estate-regeneration-national-strategy>

The Estate regeneration: resident engagement and protection strategy has this introduction

*“This section of the national strategy sets out the government’s expectations for how landlords, developers and local authorities should engage with residents throughout an estate regeneration scheme, and for how residents should be protected.*

*Successful estate regeneration schemes need to have the support of a majority of the residents, through what can be a very uncertain time for them. Early and ongoing discussions on plans for*

*the estate, and residents' personal housing needs and choices, will build a relationship of trust between residents and landowners and help to develop support.*

And includes this line *"a vote may be appropriate before complete demolition"*

The national strategy supports many of the policies laid out below.

The Labour Party in its 2017 National Conference in Liverpool voted un-aminously to support many of these principles.

### **Knock It Down or Do It Up? London Assembly's Housing Committee report into estate regeneration February 2015**

A cross party Assembly Member report which has the following introduction

*"The London Assembly's Housing Committee report into estate regeneration looks at how to improve the process of regenerating housing estates – including the decision of councils or housing associations to either renovate or demolish the estate.*

*The report is designed to provide a guide for community groups, councillors and housing professionals to some of the best ways to work together to regenerate estates. The tips include:*

- *Putting energy into early and comprehensive engagement with residents, as well as the physical build and finances*
- *Holding an independent ballot on any final decision to demolish an estate*
- *Creating a steering group of residents and securing the enthusiasm of community leaders and influencers'.*

The Principles and Recommendations section includes on page 7 the following;

*"An effective decision-making process would:*

*✓ Be robust by being clear from the outset on the purpose of the proposed regeneration and how it fits within a broader strategy for the local area and borough, communicating this early, openly and broadly, and ensuring a systematic and objective option appraisal is undertaken and published.*

*✓ Include in its option appraisal effective consideration of medium- to long-term social and environmental issues. It would incorporate an assessment of the lifecycle carbon impacts of options and feature existing residents' needs and wishes in terms of their lived experience, in tandem with the wider strategic and financial imperatives. It would be clear how residents' views have been taken into account.*

*✓ Have fully justified any regeneration proposal for which the provider considers there to be no viable alternative. An independent ballot of estate residents would be undertaken which would inform any final proposals to demolish.*

✓ *Ensure that leaseholders are treated fairly and provide for them to nominate an independent valuer so they receive fair recompense for their properties. The starting point should be that leaseholders are offered a like-for-like replacement of their property, or a similar offer, wherever possible.”*

<https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/knock-it-down-or-do-it>

### **Joseph Rowntree Foundation - Estate Regeneration Briefing for expert panel May 2016**

A report produced by Joseph Rowntree Foundation includes a number of key points including these two on page 1 and 2;

*“Regeneration works best with the consent and involvement of residents. The panel should consider offering residents a vote on major regeneration proposals affecting their homes and estates in the same way as they are balloted on plans to transfer ownership of their homes.”*

*“Given these wider policy considerations, all regeneration proposals should guarantee that there will be no net loss of social rented housing and a net increase in affordable housing alongside any plans for homes for sale and for market rent.”*

<https://www.jrf.org.uk/report/estate-regeneration-briefing-expert-panel>

The following reports were also relevant in the production of the NP policies

**Demolition or Refurbishment of Social Housing?** A review of the evidence by UCL Urban Lab and Engineering Exchange for Just Space and the London Tenants Federation

<http://www.engineering.ucl.ac.uk/engineering-exchange/files/2014/10/Report-Refurbishment-Demolition-Social-Housing.pdf>

**ResPublica; Great Estates: Putting communities at the heart of regeneration November 2016**

<http://www.respublica.org.uk/our-work/publications/great-estates-putting-communities-heart-regeneration/>

**Altered Estates How to reconcile competing interests in estate regeneration 2016**

[http://www.levittbernstein.co.uk/site/assets/files/2444/altered\\_estates\\_2016.pdf](http://www.levittbernstein.co.uk/site/assets/files/2444/altered_estates_2016.pdf)

### **Evidence of votes being better than surveys**

At Central Hill estate in Lambeth a substantial survey by residents found that 78% of their neighbours opposed demolition, with 4% in favour and 18% don't know. By contrast, an independent 'opinion test' designed by Lambeth claimed majority support. (Full figures: 47.6% for; 39.4% against; 13% undecided). Many questionnaires were filled out by researchers with council officers present at consultation events. 'Turnouts' were similar; between 65%-72% if

possible responses are limited to one per household, or around 38%-40% of all adults. Responses must have depended on who asked the questions and how. Only ballots can avoid situations like this, because elections are inherently more inclusive and fair, if appropriately organised. This is why NP Referendums are based on votes and not public consultation or surveys.

We are simply applying NP principles to estate regeneration as well.

In addition, many of the estates had public votes to determine their transfer from LBTH to housing associations. The decision was not based on a survey or public consultation.

<https://modern.gov.lambeth.gov.uk/mgAi.aspx?ID=32801>

## ER1 – RIGHT TO VOTE TO APPROVE OR REJECT FINAL PROPOSALS

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To support Sustainable Development in the Area by ensuring positive engagement of the directly affected community, and in considering the regeneration of Estates in the Area:

- 1) Residents of each Estate facing potential redevelopment must be enabled to participate fully in the redevelopment process of their own Estate.
  - 2) They must be kept informed at every stage of the process through publicly available information.
  - 3) They must be consulted on and, where reasonably practicable, actively engaged in the selection of contractors, architects and other consultants involved in the project.
  - 4) Possible development options and rules must be discussed in advance with residents through as many different venues as reasonably practicable, in person, through workshops, online and via surveys before any final options are agreed. All options must allow in full for the rights set out in policies ER5 and ER6.
  - 5) The final step in the involvement of residents should be a vote by the affected residents between multiple options.
  - 6) A vote would be triggered by any proposal that involves the demolition of homes. Votes may also be needed for other proposals that could have significant impacts on existing residents' quality of life, for example proposals for infill building or adding extra floors or taking up open space.
  - 7) The vote must take place before any related planning application is submitted.
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### Guidance to Planning

Where a planning application is submitted for an estate regeneration that materially changes an estate and there has been no vote or that vote chose a different option then the application submitted should be rejected.

## ER2 – CONDUCT OF ELECTIONS

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To support Sustainable Development in the Area by ensuring positive engagement of the directly affected community:

- 1) The vote should be a clear choice between different options, the wording of which to be approved by the relevant residents' groups, the relevant landlords and LBTH Democratic Services in advance as being clear and unbiased. One option shall be a no change proposal.
  - 2) If more than two options exist, then either multiple voting rounds must take place to narrow down the options to two, or a single transferable voting system can be used, in the reasonable judgement of LBTH Democratic Services.
  - 3) The electorate shall be determined as part of the resident's consultation process for the Estates concerned in conjunction with the Independent Consultation Body. Votes should be conducted and counted by the Independent Organisation. Every reasonable effort should be made to maximise turnout by having the voting period over several days, and by ballots being able to be submitted electronically given appropriate security controls, as determined by the Independent Consultation Body.
  - 4) The offer document detailing the options on the ballot paper shall be sent to residents at least 28 days in advance of the vote. The pros and cons of each option must be clearly set out in the document. The offer document must be reviewed by LBTH to ensure its accuracy and completeness.
  - 5) When such offer document is distributed, recognised resident's associations shall be able to add their own literature stating their view on the options, which may include opposition to the proposals. The cost of printing and distribution shall be borne by the landlord. Although there should be freedom to express views, LBTH Democratic Services and/or the Independent Consultation Body should help to ensure that facts are distinguished from opinions. The explanation of proposals therefore needs to be clearly detailed.
  - 6) Counting of votes and declaration of results shall be by Estate. Results should also be aggregated by block or street as appropriate and by type of tenure, and made publicly available as well or at the same time as the final vote result. The specific arrangements shall be determined by the Independent Organisation in consultation with the relevant residents' groups and the landlords.
  - 7) The vote shall be binding by Estate on a simple majority basis. Both the developer and residents shall be bound by the result, without prejudice to residents' other rights. The vote is just an agreement over whether or not the development can proceed to a formal planning application.
-

### **Guidance to planning officers**

Where a planning application is submitted for an Estate regeneration including a vote, LBTH Democratic Services should be consulted to confirm that they find the process undertaken acceptable and in line with this policy. If not, the planning application should be rejected.

### **ER3 – RESIDENT PARTICIPATION IN A TRANSPARENT, INCLUSIVE, OBJECTIVE DECISION MAKING PROCESS**

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To support Sustainable Development in the Area by ensuring positive engagement of the directly affected community, and to ensure residents can make informed decisions, the following are required before any final decisions are made or a vote is taken:

- 1) A stock condition survey must be carried out by an independent body appointed by affected residents, the cost to be borne by the landlord. LBTH shall validate the results and process, and residents shall be given an opportunity to scrutinise the results with the help of suitably qualified independent advice.
  - 2) Option Appraisal: The social, economic, and environmental costs and benefits of all proposed options for the future of an Estate should be assessed in detail to ascertain which are viable, as well as the pros and cons of each scenario. All assumptions and financial details should be published for all options for the future of Estates, whether proposed by residents or landlords, including those the landlord considers unviable. Information should be disclosed for all options: from no change except planned maintenance; to infill with no demolitions; to partial redevelopment; to full redevelopment at different densities.
  - 3) Independent advice must be made available to residents. The selection of independent advisers shall be made solely by the relevant recognised residents associations, but the reasonable cost shall be borne by the landlord.
- 

### **Guidance to planning officers**

Where a relevant planning application is submitted, which does not clearly demonstrate that these policies have been met, it should be rejected.

### **ER4 – RIGHT OF RETURN**

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To support Sustainable Development in the Area by ensuring positive engagement of the directly affected community, any resident regardless of tenure must have the right of return, and specifically:

- 1) Residents must be enabled to stay in the Area throughout the process of demolition and construction if that is their choice.
- 2) Relocation of residents should be on a one-move-only principle where possible, with residents moving from their old home straight into their new home, as happened in New Union Wharf, through a phased demolition and construction programme. The use of

temporary accommodation should be minimised, locally provided, and periods made as short as practically possible. Details must be clearly explained as part of proposals.

- 3) Residents must be able, through the planning process, to have an understanding of where they will be living in the future.
- 4) Residents must be enabled to return to the same Estate in which they originally lived.
- 5) Residents must be enabled to retain access to a car parking space if they already have that right.
- 6) There should be no adverse financial consequences (covering rent, service charges and removal costs) for residents as a result of their relocating, which would prevent their being able to return.
- 7) Where practically possible, residents should be re-homed close to their original neighbours, with groups of residents ideally being kept together.
- 8) Residents with direct access to gardens should be enabled to retain access to gardens or equivalent outside space wherever practically possible.
- 9) All reasonable costs directly incurred by affected residents' moving home must be borne by the developer.

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### **Guidance to planning officers**

The S106 agreement should include these as legally enforceable conditions.

### **ER5 – TENANTS' RIGHTS AND COSTS**

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To support Sustainable Development in the Area by ensuring positive engagement of the directly affected community, and subject (where relevant) to LBTH's legal obligations:

- 1) The existing security of tenure of affected Tenants shall remain unchanged.
- 2) Any expected cost changes, whether positive or negative, shall be expressly and clearly made known to all affected Tenants in advance of any vote or change (this applies to all tenures). Without limitation, this includes:
  - a) Heating and hot water costs
  - b) Service charges
  - c) Council tax
  - d) Insurance
  - e) Rent changes from taking a smaller or larger property
  - f) Any other costs which maybe applicable

- g) Tenants' existing rent levels must be retained (even if the new home has larger rooms), unless they move to properties with more or less bedrooms. Tenants should be able to choose if they wish to benefit from extra services that increase service charges, for example a concierge. Regardless of changed service levels or whether Tenants' new homes have fewer or more bedrooms, the regulatory status of rents must also be retained: 'social' target rents, defined by national regulations based primarily on local incomes, must remain 'social' rents, as opposed to rents being governed by regulations for 'affordable' target rents, based on market rates.

### Guidance to planning officers

The S106 agreement should include the above as legally enforceable conditions.

## ER6 – LEASEHOLDER AND FREEHOLDER RIGHTS

To support Sustainable Development in the Area by ensuring positive engagement of the directly affected community, and subject (where relevant) to LBTH's legal obligations:

- 1) Affected Leaseholders and freeholders shall have the right to receive a new property of at least equivalent size, location, aspect, and height without paying either additional ground rent or service charges. Owners should be able to choose if they wish to benefit from extra services that increase service charges.
- 2) The existing rights of affected Leaseholders shall not be adversely affected, with no adverse change to their existing lease terms.
- 3) Any expected cost changes, whether positive or negative, shall be expressly and clearly made known to all affected Leaseholders in advance of any vote or change. Without limitation, this includes:
  - a) Heating and hot water costs
  - b) Service charges
  - c) Council tax
  - d) Insurance
  - e) Ground rent changes from taking a smaller or larger property
  - f) Any other costs which maybe applicable
- 4) Affected Leaseholders and freeholders shall initially retain (as a minimum) an equity share in their new property equivalent to the true market value of their existing property as determined by the Independent Consultation Body (or an independent valuer appointed by that Body), and shall not be less than the price which the freeholder or Leaseholder paid for their existing property.

- 5) As determined by the Independent Consultation Body (or an independent valuer appointed by that Body), they shall be able in the future to obtain 100% ownership of the new property without having to pay any additional sums. The exact length of time shall be determined in advance of any public vote.
- 6) Policy ER2 (2) also applies.
- 7) Leaseholders and freeholders should be given the option to upsize or downsize. A robust and fair process must be agreed by the Independent Consultation Body in consultation with the relevant residents' groups of Leaseholders and freeholders in advance of any public vote.

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### **Guidance to planning officers**

The S106 agreement should where appropriate include the above as legally enforceable conditions.

### **ER7 – ESTATE SMALL BUSINESSES, RETAILERS, AND COMMUNITY ORGANISATIONS**

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To support Sustainable Development in the Area by ensuring positive engagement of the directly affected community, and subject (where relevant) to LBTH's legal obligations:

- 1) If a landlord proposes to demolish commercial premises on an Estate, affected Leaseholders using them should be formally consulted by the landlord in their own distinct group from an early stage, and represented on a formal consultation body alongside Tenants and resident Leaseholders if they wish.
- 2) Subject to viability of the proposed development, if market rents for new premises will be higher than existing rates, commercial Leaseholders should be offered sub-market rents to match their old rates per square metre, and premises of suitable size with long leases.

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### **Guidance to planning officers**

The S106 agreement should where appropriate include the above as legally enforceable conditions.

### **ER8 – PUBLIC PROFIT REINVESTMENT**

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To support Sustainable Development in the Area by ensuring positive engagement of the community, and subject (where relevant) to LBTH's legal obligations, any profit generated by Public Bodies in the Area should be re-invested in the Area, for example through Infrastructure investment or maintenance. Where such a profit is generated, the Public Body must indicate in advance to all directly affected parties and to the Forum how it intends to deal with that profit. The Forum must be included as a consultee on draft conditions and heads of terms for, and as a party to, any s106 agreement.

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**Source:**

<http://www.towerhamletsfoi.org.uk/documents/4625/15%20Fourteenth%20Schedule.pdf>

**Explanation:**

LBTH, due to the stock conditions transfer terms, may be in line to receive a 50% share of any profits from Estate regeneration. For example, the Toynbee Island Homes Development Clawback agreement, schedule 14.

Canal & River Trust is a public body that also generates large sums in the Area which has historically been spent elsewhere.

Public Body – an organisation whose ownership of land is based on a transfer from another government organisation for nil or minimal value

**Justification:**

To ensure that any decisions made by LBTH are seen as impartial, it should be made explicit that any profit it makes from Estate regeneration is re-invested back into the local community.

The docks require long term maintenance and investment to stay open and working. It would seriously damage the character and attractiveness of the Area if the docks were further reduced or closed to shipping, and would imperil both the docks', and the Area's, long-term sustainability. It is therefore essential that the docks' long-term future not be put in doubt as the result of further significant funds generated from them being spent elsewhere. They are an asset of the Area, and without them we would no longer be an island.

## 8.4 POLICY – EMPTY SITES

### ES1 – USE OF EMPTY SITES

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To support Sustainable Development in the Area, developers shall as part of their planning application and as part of the development applied for submit a proposal, feasibility study and impact assessment for a meanwhile use on their sites (including existing buildings) when they submit their substantive planning applications in case construction is delayed by more than six months after gaining full and final planning consent.

Such sites and/or buildings may be used on a temporary basis, for example for one or more of the following purposes (in order of priority), subject where appropriate to complex operational interfaces:

1. Temporary pocket parks
2. Affordable workspace or housing
3. Temporary farmers' markets or commercial markets
4. Pop-up retail and/or restaurants
5. Cultural and sporting activities
6. Public art and lighting installations
7. Other purposes agreed with LBTH and the Forum.

Such sites will be provided on the following basis:

- They can be recalled for development with reasonable notice in the context of the temporary use to which each has been put.
  - Any current planning application does not run out as long as the site is in active use by the community subject to a maximum of five years from the grant of consent.
  - Any reasonable costs incurred by the developer to make the land available for such community purpose may be in lieu of CIL or S106 contributions, provided that such costs are not part of normal development costs, are net of any Business Rate Relief, and are truly incremental and incurred solely for the temporary community use.
- 

#### **Explanation:**

There are a number of empty sites hoarded up awaiting development. Given the vagaries of demand for new development, some of those sites (e.g. JP Morgan, Helix/MacDonald's and Cuba/Manilla Street) have been empty for long periods.

There is also an issue in that sites are being developed to ground floor level and work then stops as developers wish to prove construction has started in order to not lose planning permission that has been granted (e.g. JP Morgan site). However, that land is then often unavailable for wider use as being covered in construction material or unsafe.

This policy, by freezing planning consents when land is being used for community use, will encourage developers and landowners to make use of their land while they wait for development to re-start.

We are conscious that the Housing White Paper released in 2017 may urge developers to build more quickly but it is not yet policy.

### **Justification:**

Given economic uncertainty, it is possible that sites may lie unused for extended periods. But given the lack of available land in the Area, it is in the interest of the community not to let land lie fallow and unused. Developers should be encouraged to use land in a way that will benefit the community, and which is also in the interest of developers and landowners.

An example of such a temporary and attractive use was the pocket park on the south side of Bank Street where 1 and 10 Bank Street are now under construction. Other examples include Container City II at Trinity Buoy Wharf, Containerville at 35 Corbridge Crescent in Tower Hamlets and the PLACE / Ladywell pop-up village in Lewisham.

### **Draft Local Plan:**

The South Quay Masterplan Supplementary Planning Document October 2015 has this comment on page 53 - Table 2: Suggestions for further work

*“Temporary uses and landscaping of decanted/vacant development sites and dock edges including:*

- *Pop-up retail*
- *Affordable workspace*
- *Cultural & sporting activities*
- *Public art and lighting installations”*

### **NPPF Support**

The NPPF supports in Paragraph 51 the idea that sites should not be left empty and unused *“Local planning authorities should identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies”*

### **Guidance to planning officers**

Given economic uncertainty and delays inherent in planning applications, there should always be a plan B for the site where a development is proposed in case development is delayed. This ensures that we do not lose access to sites which may play a public role.

**8.5 POLICY – HELPING ESTABLISH NEW RESIDENTS ASSOCIATIONS****GR1 – HELPING ESTABLISH NEW RESIDENTS’ ASSOCIATIONS**

To support Sustainable Development in the Area, and to facilitate the establishment of recognised residents’ associations in large residential developments which have to be dealt with by a development committee of LBTH (excluding call-ins), as part of the s.106 agreement for such new developments with at least 50 residential units, developers must ensure that:

- The principal landlord includes in all its residential unit leases automatic membership of a formally recognised residents’ association, with authority for the landlord or its agent to collect appropriate funds for the association as part of the service charge; and
- Before leasing any residential unit, such landlord establishes a model constitution for the association (in a form approved by the Forum) and all other necessary arrangements for it to function effectively; and
- Appropriate parties independent of such landlord or developer are appointed to act as the initial association committee pending their substitution by residents of each development.

**Explanation:**

Residents of new developments typically discuss with each other common issues, may set up Facebook groups to communicate with each other, and slowly start to form residents’ associations to have a formal role in the buildings they live in. Especially in large high rise residential developments, such a process can take a long time, be extremely frustrating, and lead to difficulties for landlords and their managing agents.

This is because regulatory guidance for residents’ associations is that at least 60% of the Leaseholders must be members before an association should be recognised. However, it is practically impossible for a resident group in a modern high rise residential building to achieve such a threshold, especially where the majority of the flats in the building are owned by foreign investors, so only a minority can be contacted. Moreover, the security in modern large residential buildings is such that residents may well be unable to access the homes of residents on other floors. Achieving a 60% mandate is therefore probably impossible after the building is populated.

But if a landlord formally recognises an association when the mandate is less than the 60% the regulations generally require before they could have recognition forced on them by a property tribunal, they could be criticised by residents who have not mandated the association to agree to spending decisions on their behalf, and who might then refuse to pay the service charges incurred to fulfil those spending decisions.

Hence the grandfathering policy. If all Leaseholders are by default signed up to a recognisable and recognised association when they take their lease from the landlord, this entire problem evaporates.

**Justification:**

Having a formally recognised residents' association will enable landlords to have an organisation to discuss issues with, and enable residents to have a formal role in the management of their buildings.

Given the very large new neighbourhoods being created vertically where security often makes it impossible to access other parts of the development, residents' associations are hard, and potentially impossible, to form after buildings have been populated. Currently residents can partially get around these restrictions through the use of social media, but this limits their outreach, especially if service-charge-paying property owners – the only parties relevant to the official 60% threshold – are largely based overseas.

**Other Plans and Draft Local Plan:**

No comment or policy in the Draft Local Plan can be found.

**NPPF Support**

Paragraph 69 of the NPPF says *“The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.... opportunities for meetings between members of the community who might not otherwise come into contact with each other”*

**Guidance to planning officers**

S106 agreements should include a paragraph detailing how the developer will meet this policy requirement and should include a copy of the model constitution.

## 8.6 POLICY – 3D MODEL

### 3D1 – 3D MODEL FOR PLANNING

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To support Sustainable Development, planning in the Area shall be conducted using a 3D model with the following capabilities:

- Fidelity – to within 15 centimetre accuracy for the existing area, and to within 1 centimetre for new developments.
- It should cover the OAPF area plus Limehouse ward: not just the Area.
- To capture the wider impact of development, including without limitation daylight/sunlight or wind flow, the boundaries of the model should extend by 500 meters beyond the boundary of the area, or to the opposite bank of the River Thames, whichever is closer.
- It should encompass LVMF protected views.
- It should include consented schemes.
- It should have rights of light and sunlight study capability.
- It should allow for real time transport overlays.
- It should enable fly-through visualisations from different points and perspectives.
- It should enable wind flow modelling.
- Subject to LBTH’s legal obligations, it should be publicly accessible online.
- It should include underground as well as above-ground maps and features.
- It should be able to integrate Building Information Modelling information in order to be able to view inside the building where appropriate e.g. emergency services access
- Reasonable one-off set up costs can be met from CIL.

The model shall be part of any presentation to the Development Committees of LBTH.

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#### **Explanation:**

There are a number of detailed 3D models available which show what is possible. The Vucity model [www.vucity.co.uk](http://www.vucity.co.uk) model is one example that can be viewed.

#### **Justification:**

It is no longer sustainable to plan an area of such complexity, density and scale in 2D. The GLA are themselves building a digital model of the East of the City. That model should be extended

not just to approve planning applications, but as a live model to plan everything in the area from new CCTV cameras, to new cycle parking, to the location of street bins.

The GLA ‘City in the East’ document released in 2015 on page 8 says this

*“Building a digital model of City in the East*

*The GLA digital 3D model for City in the East covers large parts of the Thames Gateway. This model coverage will be gradually increased and the model updated in partnership with public and private sector stakeholders, with the objective to eventually cover all of London. It will provide a platform to inform spatial design and planning as well as consultation processes as an interactive live 3D model. Developers of individual sites will be expected to provide 3D models of their schemes in an agreed format which will be used to populate the GLA’s model as schemes come forward. Developers will also be expected to contribute to the cost of locating their schemes within the GLA’s wider model.”*

It was illustrated with an old and out of date 3D model picture of the Isle of Dogs.

<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/opportunity-areas/city-east>

[If nations like Singapore can plan their whole country in 3D it should be possible to achieve the same in the Area.](#)

## **NPPF Support**

Paragraph 56 of the NPPF says *“The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.”*

Paragraph 58 says *“are visually attractive as a result of good architecture and appropriate landscaping.”*

Given the vertical scale of development (up to 239 meters above sea level) in the Area we believe that good design and good architecture in the 21<sup>st</sup> century require the use of 3D models in the planning process.

## **Guidance to planning officers**

Presentations made to LBTH Planning Committee which do not include the ability to have a fly-through presentation or views from different angles of the development in its wider context through a 3D model should be rejected. It is no longer sustainable to plan at this level of density and height without better tools.

## **Other Plans and Draft Local Plan:**

Not mentioned

### 3D2 – 3D MODEL FOR APPLICATIONS

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To support Sustainable Development in the Area, when submitting a planning application for any development which has to be dealt with by a development committee of LBTH (excluding call-ins), developers shall at their own expense submit a 3D model outline to allow the model described in policy 3D1 to be updated for the proposed application, and with sufficient fidelity to carry out all the requirements described in policy 3D1. Developers should also make available internal information about the layout of buildings where it assists emergency services or other interested parties. These models should be updated when any revisions are made to the application.

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**Explanation:**

In order to keep the 3D model 'live', any applications submitted must include 3D models to allow the model to be updated.

The emergency services are seeking more information about buildings including the number of storeys, internal layouts, emergency access points, lift locations, fire hydrant locations etc. in order to be able to respond better in an emergency.

**Justification:**

See Policy 3D1

**Other Plans and Draft Local Plan:**

See Policy 3D1

## 8.7 POLICY – BROADBAND ACCESS

**BBA1 – FIBRE TO THE PREMISES**

To support Sustainable Development in the Area, where practically feasible, each new residential development which has to be dealt with by a development committee of LBTH (excluding call-ins) must provide fibre optic cabling to each individual home or work space capable of carrying fast broadband, telephone and television signals (known as Fibre To The Premises or FTTP).

**Explanation:**

A number of recent developments in the Area do not have fibre to the home, requiring expensive or difficult retro-fitting. Without dedicated fibre, it will be impossible to supply broadband delivering super-fast broadband to all homes. Given our closeness to Canary Wharf and several data centres of national importance in the wider area it is essential for the competitiveness of the Area that all new developments can supply the fastest possible speeds.

New Building Regulations already require copper or fibre to the home in the “*Approved Document R: Physical infrastructure for high-speed electronic communications networks*”. This policy requires the use of fibre given the density of development in the Area, as copper cabling will not provide sufficient capacity nor future proofing.

**Justification:**

The Government’s aim is to provide superfast broadband (speeds of 24Mbps or more) to 95% of homes by 2017. The government has this to say about superfast broadband;

*“Superfast broadband makes home life more fun, connected and productive. It opens up a vast world of learning and entertainment; provides better, cheaper and easier ways to keep in touch with friends and family across the world; and creates opportunities to work and learn successfully from home, revolutionising our lives.”*

<https://www.gov.uk/guidance/broadband-delivery-uk>

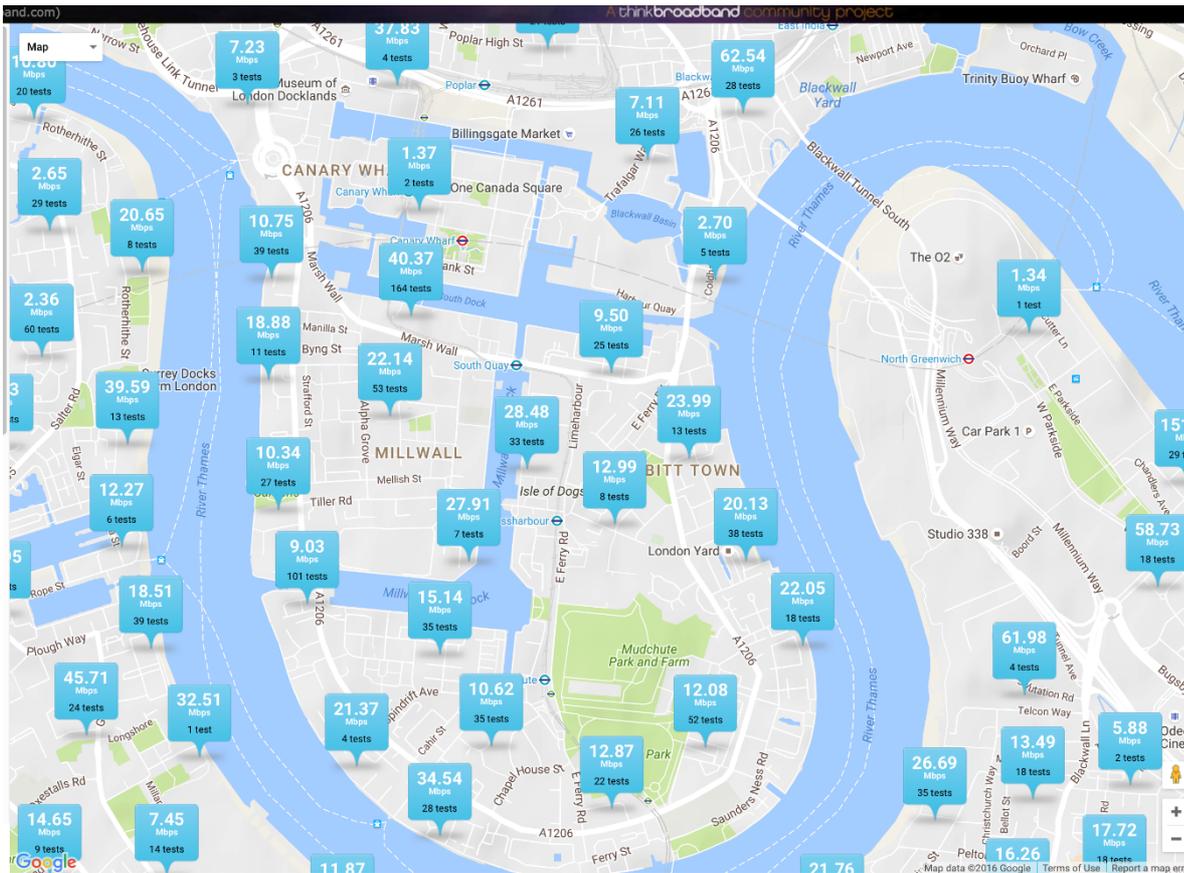
When new residents arrive in the Area they are often shocked by how poor broadband speeds are in recently completed developments.

The Government describes Fibre to the Premises (FTTP) thus;

*“This is where optical fibre is run from the exchange all the way through to the premises, allowing for a very quick and fully future proofed internet connection. Speeds offered over FTTP are far above the national average - typically up to 1gbps - and very high upload speeds are also offered, which is particularly useful for businesses or those working from home.”*

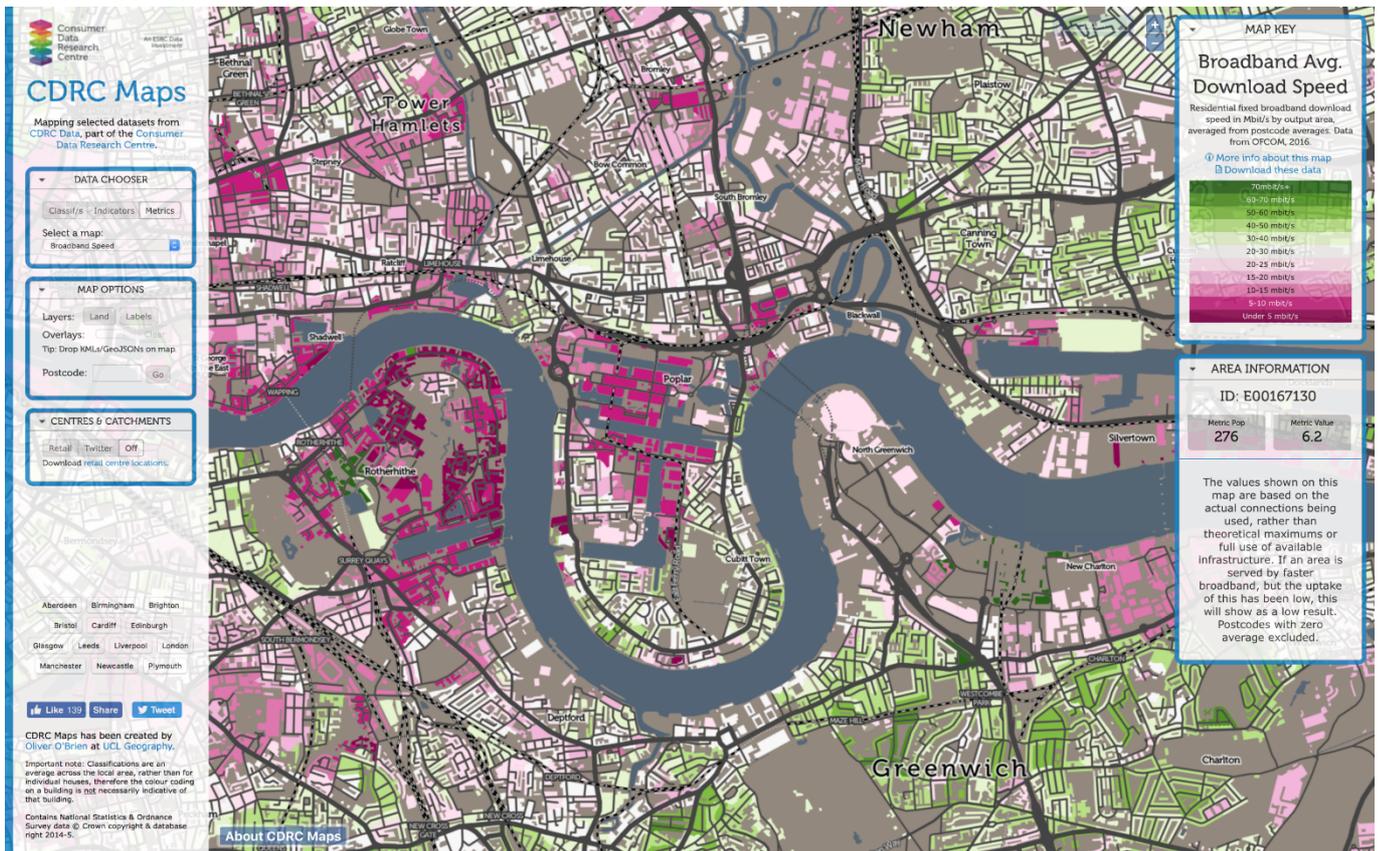
*The attached speed map run November 2016 shows how poor broadband speeds are in large parts of the wider area.*

<http://maps.thinkbroadband.com/#!lat=51.50067824937107&lng=-0.01398833305052527&zoom=15&type=terrain&speed-cluster>



The map below is from the [Consumer Data Research Centre](http://www.consumerdataresearchcentre.com). It shows Average Broadband Download speeds. Deep purple indicates under 5 Mbit/s, and dark green above 70 Mbit/s. It can also be found here.

<https://maps.cdrc.ac.uk/#/metrics/bband/default/BTTTTFTT/14/-0.0131/51.5018/>



## Other plans and Draft Local Plan:

## NPPF Support

Paragraph 42 of the NPPF says “Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.”

## Guidance to planning officers

The planning application should confirm that each unit will have fibre to each home. If not, it should be made a condition of any approval.

## BBA2 – BROADBAND RESILIENCE AND CHOICE

To support Sustainable Development in the Area and where practically feasible, in each new residential development which has to be dealt with by a development committee of LBTH (excluding call-ins), the s. 106 agreement shall require that occupiers of such developments must be able to connect to two separate superfast broadband providers, providing users with a choice to ensure competition and redundancy. This will require connecting to two separate networks: not two providers using the same network.

**Explanation:**

BT/Openreach has historically under-invested in the area due to limitations within the Poplar Exchange. As a result, some residents experience broadband speeds far below those recommended by the government even though many can see the data centres in Blackwall which handle almost 50% of the UK's internet traffic.

With BT/Openreach, Hyperoptic and Virgin Media all active in the Area as of November 2016, there are now multiple providers available.

This policy could be met by having the normal BT phone line which is also capable of connecting to the Internet plus a connection to one other network.

**Justification:**

To ensure consumers have a competitive choice of products for what is an essential component of modern life.

**Other plans and Draft Local Plan:**

The UK has a strong record of competition policy driven by regulators like the Competition and Markets Authority. But in this Area, there is little policy on ensuring that residents have access to a competitive range of products.

**NPPF Support**

Many sections of the NPPF like Paragraph 174 make reference to the need to ensure affordable housing. It is therefore important to ensure that services to all housing is also provided affordably. Requiring competing providers will assist this.

**Guidance to planning officers**

The S106 agreement should include detail as to how this condition will be met.

**BBA3 – MOBILE NETWORK RESILIENCE**

**To support Sustainable Development in the Area, mobile phone companies shall be consultees in the planning application process.**

**In relation to developments which have to be dealt with by a development committee of LBTH (excluding call-ins), developers shall in their planning applications provide evidence that they have co-ordinated with any mobile phone providers who have base stations within 500 meters of a relevant development location, in relation to the impact such development may have on mobile phone signals from such mobile base stations. Such**

developers shall, as a pre-occupation condition or s106 obligation, have agreed where feasible to allow communication infrastructure within or on their buildings.

If a development site already contains communication infrastructure, developers shall have agreed, as a pre-occupation condition or s106 obligation, to ensure the re-provision of the same in any new development so that there is no loss of connectivity to the wider area.

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#### **Explanation:**

The network of a major provider has been suffering from network issues since September 2016 when a new building started to block signals from an existing base station. Other mobile phone providers are now suffering from similar issues. As it can take 18 months or more to implement a new mobile phone base station, this means users will suffer from an extended period of poor service. The more advance notice that mobile phone providers have of disruption, the quicker they can re-configure their network.

#### **Justification:**

To ensure residents, visitors and workers do not suffer from poor mobile phone access. Mobile broadband is a critical feature of modern life but tall buildings can block mobile phone signals and, given the scale, height and density of development already experienced in the Area, poor network reliability and access results.

#### **NPPF Support**

Paragraph 43 of the NPPF says *“In preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.”*

#### **Guidance to planning officers**

Planners should confirm with developers that they have consulted the appropriate phone companies and that the planning application includes detail of how communications infrastructure is provided where appropriate.

**8.8 POLICY – CONSTRUCTION MANAGEMENT AND COMMUNICATION****CC1 – CONSTRUCTION COORDINATION**

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To support Sustainable Development in the Area, construction companies shall consult the Forum when producing, or making any material changes to, a construction management plan, including without limitation encroachment on public land and/or public access.

LBTH shall also consult the Forum in developing construction management plans in the Area.

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**Explanation:**

Construction companies should consult the Forum when drawing up their construction management plan especially when that construction will have an impact on the wider area.

**Justification:**

Residents are often the last to know what is happening on their own door step. Through the local community's local knowledge, awareness of other developments and ability to communicate with the wider community, by working with developers the community and the Forum can materially improve construction management, making life easier for the developer and residents.

**Guidance to planning officers**

No construction management plan should be agreed unless the Forum has had a reasonable opportunity to be consulted.

**CC2 – CONSTRUCTION COMMUNICATION**

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To support Sustainable Development in the Area, construction companies shall inform the Forum as soon as reasonably practicable whenever they propose a change to normal working hours or conditions for which they have to seek the permission of LBTH, and of such permissions being granted.

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**Explanation:**

The Forum should be emailed when there is a change. Some developers in the Area already do this but others currently do not.

**Justification:**

Residents are often the last to know about any change to allowable hours, this often results in frustration and extra work as they then try and find out if the work had been allowed or not. There

is also sometimes a lack of communication between different developers and other stakeholders as to what is happening in a small area with tightly packed and large developments.

The Forum can disseminate any changes of working practises or hours to the wider community and to other stakeholders. Simply being copied into any email communication to or from LBTH would meet this policy requirement.

### **Guidance to LBTH**

The Forum shall be copied into any messages (email or in writing) about a change to working hours or conditions.

### **CC3 – CONTROL OF DUST AND EMISSIONS DURING CONSTRUCTION AND DEMOLITION**

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To support Sustainable Development in the Area, construction management plans shall specify how they comply with the GLA’s Supplementary Planning Guidance “THE CONTROL OF DUST AND EMISSIONS DURING CONSTRUCTION AND DEMOLITION’ released in July 2014 or any successor or replacement guidance.

Subject to the parties’ legal obligations, all relevant data shall be shared with the Forum using such method as shall be reasonably determined by the Forum.

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#### **Source:**

GLA Website contains the original SPG

<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/control-dust-and>

#### **Explanation:**

The aim of making the GLA’s SPG into Neighbourhood Plan policy is to reduce emissions of dust, PM<sub>10</sub> and PM<sub>2.5</sub> from construction and demolition activities in London. It also aims to control nitrogen oxides (NOx) from these same activities by introducing an Ultra-Low Emissions Zone (ULEZ) for non-road mobile machinery.

#### **Justification:**

With more intense construction, underway in the Area than anywhere else in the UK, and in a geographically limited space, it is essential that construction is undertaken to the highest standards.

#### **NPPF Support**

Paragraph 109 says *“The planning system should contribute to and enhance the natural and local environment by...preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability”*

**Guidance to planning officers**

No construction management plan shall be approved until it makes clear how it complies with the control of dust and emissions SPG during both demolition and construction. They should enable residents to have ready access to noise and air quality data.

**8.8 POLICY – SUSTAINABLE DESIGN****SD1 – SUSTAINABLE DESIGN**

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To support Sustainable Development in the Area, proposals for developments that have to be dealt with by a development committee of LBTH (excluding call-ins) shall be accompanied by a pre-assessment, demonstrating how the following BREEAM standards (or any future replacement standards) will be met:

- All new non-residential developments and non-self-contained residential accommodation are expected to meet at least BREEAM ‘Excellent’ rating.
  - All major non-residential refurbishment of existing buildings and conversions over 500sqm floor space (gross) are expected to meet at least BREEAM non-domestic refurbishment ‘Excellent’ rating.
  - Residential developments should use and comply with the Home Quality Mark, launched in 2015. This especially applies to developments exceeding London Plan recommended density limits.
- 

**Source:**

Strategic Policy SG1 Sustainable Growth in Tower Hamlets in the Draft Local Plan.

**Explanation:**

These policies are in the Draft Local Plan but, as the new Local Plan is likely to be adopted after this Plan, it is desirable to set these standards as soon as possible.

**Justification:**

LBTH has said it will strongly encourage schemes to use the Home Quality Mark.

**Other plans and the Draft Local Plan:**

Strategic Policy SG1 Sustainable Growth in Tower Hamlets in the Draft Local Plan.

**NPPF Support**

The NPPF in Paragraph 57 *“It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.”*

The tallest and densest buildings in the United Kingdom should be of the highest possible standards.

**Guidance to planning officers**

Planning applications should be rejected if they do not meet these criteria.

**8.9 POLICY – AIR QUALITY****AQ1 – AIR QUALITY**

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To support Sustainable Development in the Area, proposals for developments that have to be dealt with by a development committee of LBTH (excluding call-ins), shall comply with the following:

- 1) Development shall not damage the health of the air. It must also contribute to the rapid achievement of the most ambitious goals in the Paris Agreement.
- 2) New development or substantial refurbishment of existing buildings shall be designed to have zero local emissions to air now, and zero total emissions to air by 2020. In particular:
  - a) Such development, including its associated vehicle movements, must demonstrate that it is 'air quality positive' and must contribute to helping the Isle of Dogs reduce all air pollutants to levels below World Health Organisation (WHO) guidelines everywhere within the Area by 2020.
  - b) Such development will not be granted planning permission where it worsens air quality, even by a negligible degree, at any receptors where levels of pollutants at those receptors already exceed WHO guidelines. In this regard, a predicted or actual increase in the annual mean concentration of pollutants of 0.1 microgram per cubic metre or more is considered significant.
  - c) Such development will not, under any circumstances, be granted planning permission where it worsens air quality at any receptors so that previously compliant receptors exceed WHO guidelines as a result of the development.
  - d) Such development which worsens the quality of the air where WHO guidelines are already complied with can only be justified by the principle of sustainable development as understood in International Law. Development which significantly increases the risk to human and ecological health will never constitute sustainable development.
  - e) All such development has a continuing obligation to improve air quality to achieve the best standard of air quality practically possible. Occupiers of developments should take proactive steps to adopt measures which will reduce their adverse impact on air quality. Developments should enable occupants to take such steps, for example (and without limitation) by installing electric vehicle charging points if they are providing parking spaces, providing adequate cycle parking, resident travel plans, or member to car clubs. This requirement applies even where WHO guidelines are complied with.
  - f) Such development must avoid contributing to the deterioration of air quality throughout its lifespan as far as practically possible.

- g) All such development must ensure that standards of indoor air quality for carbon dioxide (CO<sub>2</sub>), fine particles (PM<sub>2.5</sub>), nitrogen dioxide (NO<sub>2</sub>), formaldehyde and volatile organic compounds (VOCs) comply fully with the most ambitious international standards such as ASHRAE's Air Quality Guide: Best Practices for Design, Construction and Commissioning, BREEAM, BS:EN 13779 (2012), ISO 16890, LEED and WELL Building Standard. Air handling equipment must be regularly maintained.
- 3) All such development should, where necessary, include measures to minimise residual environmental impacts on those using the development and on all those who may be affected by the development.
- 4) Proposals for new restaurants and cafés (Class A3), drinking establishments (Class A4) or hot-food take-away (Class A5) to place tables and chairs on the pavement will only be permitted if the World Health Organisation's guideline for hourly mean exposure to nitrogen dioxide is unlikely to be exceeded in that location.
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**Source:**

Knightsbridge Neighbourhood Plan POLICY KBR41: HEALTHY AIR

[http://www.knightsbridgeforum.org/media/documents/part\\_one\\_knightsbridge\\_neighbourhood\\_plan\\_pre-submission\\_consultation\\_081216.pdf](http://www.knightsbridgeforum.org/media/documents/part_one_knightsbridge_neighbourhood_plan_pre-submission_consultation_081216.pdf)

**Explanation:**

Air Quality is a major concern of residents both within the Area and in London as a whole.

**Justification:**

Air quality is a great concern to residents. We have major sources of pollution to our north (Aspen Way and Blackwall Tunnel), nearby at London City Airport, and major construction sites generating large amounts of dust and which also use diesel generators. Moreover, the Enderby Wharf cruise ship terminal in Green may also generate significant quantities of pollutants as their engines provide hotel power.

We have one air quality monitoring station in Millwall Park, far from the main sources of pollution, but even that indicates that we have issues locally with air quality.

**Guidance to planning Committees**

Planning applications shall not be approved unless they can demonstrate that they meet these requirements.

**NPPF Support**

Paragraph 109 says *"The planning system should contribute to and enhance the natural and local environment by... preventing both new and existing development from contributing to or being*

*put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability”*

## 8.10 RECOMMENDATIONS

The following are not legally enforceable planning policies, but are recommendations that we support and which we believe will help ensure Sustainable Development.

### RECOMMENDATIONS FOR HOUSING REGENERATION

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In addition to the above policies:

- A. In addition to policy ER6, this Plan recommends that, as new properties are likely to be valued at considerably more than original homes, many owners would not be able to afford to buy new properties outright. Owners who choose to return, (as opposed to those choosing to take market value compensation and move away), must be able to obtain 100% ownership of their new property at some point in the future without having to buy more equity in addition to what they could originally afford. This is conditional on owners using all of their market value compensation and Home Loss payment to buy as large a share as possible. The landlord 'topping up' owners' equity like this is known as a Home Swap model, as detailed in the Estate Regeneration National Strategy. The qualifying period before owners reach 100% ownership – normally 7 years - should be detailed in advance of any public vote.

Landlords should also report on the possibilities of 'early buy back' options. Where 'returning' owners use their compensation to buy a share of a new home early, possibly before it is built, thereby reducing landlord's borrowing costs.

- B. This Plan endorses the recommendations for housing regeneration areas put forward in the George Clarke review for the Department of Communities and Local Government, which are summarised as follows:
1. Refurbishing and upgrading existing homes should be the first and preferred option rather than demolition. Full engagement with the community is required for any existing homes regeneration programme. The local community and stakeholders should be able to make informed decisions about the future of their homes and areas and consultation with them should be clear, open and unbiased. Demolition of existing homes should be the last option after all forms of market testing and options for refurbishment are exhausted.
  2. If, following an open and transparent community consultation process and after rigorous market testing for refurbishment, demolition is still the preferred choice of the community, then Tenants/owners should be offered 'like for like' properties. Temporary accommodation should be a last resort. Where possible, people should be offered the choice to move to accommodation more suited to their needs.
  3. If owners/Tenants are moved to a new property, they should suffer no net financial loss beyond what they would expect as a reasonable increase if they remained in their existing home and in line with inflation.
  4. Areas should not be systematically 'wound down', which is a process that destroys communities and reduces house prices in the area. Where people are required to move out of their homes, this should be done in a considered and co-ordinated way which

supports residents and prevents individuals being left in deserted streets. If homes are to be demolished, they are to be emptied and demolished as quickly as possible to make way for new development.

5. Homes should not be emptied at all until full planning permission has been fully approved for demolition and new build development in advance (with majority support from the local community) and the required funding for the new development is fully secured with a clear timetable for delivery.
6. If an area of existing housing requires improvement, remodelling or redevelopment, then a 'mixed and balanced' urban design scheme should be considered where existing properties are retained and improved while being mixed with appropriate new build development.
7. Local Authorities and Housing Associations should promote and encourage alternative methods of project procurement for the refurbishment of empty homes such as Homesteading, Co-operatives and Sweat Equity schemes. These are community-based schemes that encourage community involvement while providing better value for money.
8. Wherever possible, displaced occupiers should be given a "right to return" following the completion of a housing renewal programme. In practice this means giving first refusal to new or refurbished houses at the same price as the compensation paid to the occupier when they were displaced.
9. Where a regeneration scheme is withdrawn or partly withdrawn prior to demolition, owners should be given first refusal to have their home back (where safely habitable). The property should be offered at the same price as the compensation they received minus any compensation due for remedial work to return the property to the condition it was in prior to sale.
10. Where properties decanted for renewal schemes are left empty for more than six months, and where decency levels permit, they should be openly offered for temporary accommodation.

In April 2012, the Department for Communities and Local Government appointed George Clarke as empty homes adviser. On the 20th June, they published his ten point recommendations, listed as policies above. The Minister for Communities, Don Foster MP then called on councils to sign up to George Clarke's ten-point review for housing regeneration areas.

<https://www.gov.uk/government/news/91-million-cash-to-tackle-over-6000-empty-and-derelict-homes>

## 9. 'LONG' NEIGHBOURHOOD PLAN

In parallel with the quick Plan we will be working on the next Neighbourhood Plan: the Long Plan. Below we have detailed the subjects we will be working on which may result in additional policies in the Long Plan.

These subjects are not included in the quick Plan as policies but they have been included in this document for the following reasons:

- i) If the quick Plan is materially delayed following its submission to LBTH, then we may request that the independent examiner adds some or all of the following as policies in the quick Plan. This therefore is a part of a continuing consultation process.
- ii) To clarify what is not in the quick Plan by identifying what we aim to deliver separately in the Long Plan.
- iii) To reassure the community that we are working on a wider range of policies than just those in the quick Plan.
- iv) That some of these subjects will require spending or investing CIL.
- v) They make clear to stakeholders our aspirations as regards the Draft Local Plan and the OAPF.

The areas of activity will include the following (more may emerge):

### 1) Local Detail

- a) Each street or Estate will have specific needs and may wish to go to a level of detail that would swamp the main document. It will be up to each individual area to decide what it wants to do, and whether or not to draw up its own mini-plan.
- b) For example, the location of street bins, lighting, fencing, pedestrian routes, signage, cycle parking, parking bays, green verges could all be done at a street or Estate level.
- c) These sections will be driven only by residents of those smaller areas.

### 2) Affordability and Economic Strategy

There is a risk that the island becomes a dormitory for Canary Wharf and does not represent a balanced economy as new residential development crowds out all other forms of economic activity. Also, where services can only be accessed by going to Canary Wharf itself for example, we risk losing all of our banks and main post offices in the Area. We therefore propose that the Long Plan addresses the following:

- a) That we ensure a broad range of services at different price points so that life is affordable for all but that we also have a good range of services locally.
- b) Affordable housing.
- c) Affordability is an issue not just for residents but for businesses as well.
- d) How do we encourage a wider range of economic activity on the island?
- e) How do we encourage a broad range of retail offerings to fill different needs and price points?

- f) Competition, given dominance of certain retailers or lack of supplier choice in large developments.
- g) Positively encourage micro and small businesses to be launched and run by local residents, and promote the Area for small business location. Provide business support and advice services, affordable workspace options, a directory of small businesses and a directory of vacant premises.

### 3) Utilities

How do we ensure that we have access to all of the utilities we need without digging up the roads every six months?

- a) How to avoid repeatedly digging up the roads?
- b) Water
- c) Sewage
- d) Power
- e) Broadband
  - i) Setting out minimum speed standards for each home
  - ii) Public Wi-Fi network
- f) Mobile networks
- g) Gas

### 4) Affordable Housing

- a) Durability
- b) Family
- c) Design
- d) Housing association guidance
- e) New types of affordable housing to meet different needs
- f) Community Land Trust

### 5) Children and Young People

The use of double stacked porta-cabins as a school, the lack of adequate child play facilities, children having to kick a ball around on a pathway, the departure of many parents once their children start growing up and the lack of youth facilities – all these things suggest that those under the age of 18 are the worst served group on the island.

- a) Playgrounds
- b) Nursery
- c) Schools
  - i) New schools including possibly floating schools
  - ii) School expansion
- d) Shared facilities for schools
- e) Expansion of existing schools
- f) Scouts and Sea Scouts
- g) Youth provision, facilities and centres

**6) Public Realm**

How do we avoid concrete canyons and make the Area a pleasant place to live?

- a) Parks
- b) Streets
- c) Floating gardens
- d) Elderly access
- e) Disabled access

**7) Communication, Smart Cities and Technology**

Whether new technology can help solve some of our problems.

**8) Rubbish and Recycling**

- a) Recycling
- b) On street bins
- c) Collections
- d) Waste minimisation

**9) Health and Environmental**

- a) Pollution monitoring – noise, air quality, water
- b) Mitigation
- c) Environmental measures
- d) How to live healthy lives in tall buildings

**10) Transport Strategy**

Given our geographical limits, we need our transport system to be as efficient as possible.

- a) OAPF liaison
- b) Pedestrian strategy – everything within walking distance
- c) Bridges
  - i) Within the Area
  - ii) To Rotherhithe and Greenwich
- d) Bus
  - i) New autonomous buses
  - ii) New bus routes i.e. counter clockwise up Manchester Road
- e) Cycling strategy
  - i) Cycle lanes
  - ii) Cycle parking and services
  - iii) Cycle junctions and safety
- f) Parking
  - i) Delivery vehicles – Amazon, Deliveroo, etc.
  - ii) Taxis
  - iii) Cars

- g) Autonomous vehicles
- h) On street, electric car-charging points

The Area will have a very significant increase in delivery of goods to local residents and businesses given that very limited or no private parking provision is provided alongside most of the developments. A plan is required to address the impact of increased vehicle use and provision of parking facilities.

### **11)Heritage**

The Isle of Dogs does not have a long-settled history unlike other parts of London, and thanks to the Luftwaffe we do not have many historic buildings left. That makes it even more important to protect what little we have left.

- a) Protecting assets
- b) List of assets we wish to protect
- c) Archaeology
- d) List of approved names – for example, where we can use the name Millwall again?

### **12)Community Development**

- a) New community facilities
- b) Existing community halls
- c) List of assets we want to develop
- d) Sports facilities
- e) Places of worship – integration of faith communities

### **13)Safety and Security**

Although currently a low crime area, we do suffer from Anti-Social Behaviour ('ASB') issues which is likely to worsen:

- a) CCTV
  - i) Public fibre-optic network
  - ii) Private networks
  - iii) Cameras
  - iv) Use of CCTV
  - v) Locations
  - vi) Control room
- b) Lighting
  - i) Type e.g. LED
  - ii) Location
- c) Police station – new station?
- d) Security by design
- e) Terrorism
- f) ASB
  - i) Interior of buildings
  - ii) Exterior areas

**14) Delivery, Stakeholders and Partners**

How do we ensure that we deliver the Long Plan?

**15) Estate Regeneration** (but only with the support of the affected communities)

Enhance and expand the policies in the quick Plan. New policies to be on an Estate by Estate basis and written by residents of the affected estates.

**16) Design Guide and Planning Policy Guide****17) Environmental Impact Assessment****10. PARISH / TOWN COUNCIL FOR THE ISLE OF DOGS**

One of the possible methods for delivering the long-term objectives of the community is by setting up a Parish or Town Council for the Isle of Dogs using the boundaries of the Isle of Dogs Neighbourhood Planning Forum and those areas which may wish to join the Parish Council.

Town and parish councils are the first level of local government. They provide communities with a democratic voice and a structure for taking community action. (Despite the name, they have nothing to do with churches, and can also be called Community Councils).

More than a third of people in England currently have a town or parish council, and the Government is making it easier to set one up. But they have not existed in London since the 1963 Greater London Act which abolished them. The 'Local Government and Public Involvement in Health Act' 2007 and the 2011 'Localism Act' re-introduced the ability to set up new Parish Councils. Queens Park in West London is the first one in London.

A Parish Council would not replace Tower Hamlets Council for the majority of its responsibilities, but would have the ability to act locally on local issues, and could have the ability to raise its own funds via a precept (an addition to the Council Tax) and run some local services.

There is a wider issue for Tower Hamlets Council: how to manage the enormous population growth, and the increasing disconnect between wards which are not growing and those which are. Tower Hamlets is becoming increasingly dissimilar, and will therefore become increasingly difficult to manage the Borough centrally on a top down basis. But it would not make economic sense to break up the Borough as you lose economies of scale. The solution may well be local issues managed by Parish Councils, and everything else by the Borough. Spitalfield's Neighbourhood Planning Forum have started the process of setting up a new Parish Council in Tower Hamlets.

There are two routes to starting the process to look at setting up a new Parish Council:

- Collecting signatures on a petition or;

- “A neighbourhood forum that’s had a neighbourhood development plan passed at referendum can trigger a community governance review without needing a petition.”<sup>6</sup>

This Neighbourhood Plan will therefore require LBTH to initiate a ‘community governance review’ to see if a local Parish Council should be created. This Plan does not commit to the actual setting up of a Parish Council, as that would be subject to a separate referendum on whether or not to set up a Parish Council for the Isle of Dogs using the boundaries of the Forum Area. It just dispenses with the need for a specific petition to start the LBTH process.

Whether areas originally in the Forum application submitted on the 1<sup>st</sup> December 2014 wish to join an Isle of Dogs Parish Council would be the subject of a separate consultation.

## 11. NEXT STEPS

Step one is to submit this Neighbourhood Plan to LBTH who will then start their own 6-week statutory consultation.

Step two is an Independent Examiner who will check that this Neighbourhood Plan meets the conditions laid out in legislation.

There is then a public referendum where registered voters are asked to vote on whether or not to accept the Neighbourhood Plan. If the majority of voters vote ‘yes’, the Plan will then be adopted by LBTH and will have legal force until 31<sup>st</sup> December 2031.

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<sup>6</sup> <https://www.gov.uk/government/get-involved/take-part/set-up-a-town-or-parish-council>