

EXAMINATION OF THE LONDON BOROUGH OF TOWER HAMLETS LOCAL PLAN

MATTER 10: SITE ALLOCATIONS

ISSUE 10 – ARE THE SITE ALLOCATIONS JUSTIFIED BY THE EVIDENCE BASE AND OF SUFFICIENT DETAIL SO AS TO BE EFFECTIVE IN DELIVERY?

Representations on behalf of Ashbourne Beech Property Limited

1. These further representations are submitted to address the matter of site allocations and particularly the following issue identified by the Inspector:

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

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
 - *Is the allocation justified by the evidence base?*
 - *Is the extent of each site correctly identified?*
 - *Are the detailed requirements for each site clear and justified?*
 - *Are the allocated sites deliverable?*
 - *Are the allocations justified and effective? Have all of the site constraints been taken into account?*
 - *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*
2. The representations submitted on behalf of ABPL to Chapter 5: Sub-area 4: Isle of Dogs and South Poplar (Comment ID LP109 and LP110) raised several questions regarding the statements that are set out regarding the development potential of the Isle of Dogs and specifically relating to Site Allocation 4.3 Crossharbour Town Centre. These further representations expand on the points previously made with specific reference to Issue 10 and paragraph 10.1. Regard has been had to the Schedule of Proposed Changes prepared by the Council.
 3. The Council propose changes to Chapter 5: Sub-area 4. The following comments are made on behalf of ABPL in respect of:
 - MM261 proposes the insertion of the words “where appropriate” at the end of the first sentence in the third paragraph of the Vision for the Isle of Dogs and South Poplar (pp217 and 218). This proposed addition is supported.
 - MM263 and MM264 propose amendments to Point 16 and Point 20 at p221. These proposed changes are noted.
 - MM268 proposes to remove reference to the Isle of Dogs and South Poplar Opportunity Area Planning Framework as a relevant evidence link. This is noted (and comments included below in the Statement).

- MM279 proposes changes to Figure 42: Crossharbour Town Centre. These changes include removal of the indicated “strategic pedestrian/cycling route along the southern boundary of the site through Mudchute Park”, removal of “the northern section of the central local pedestrian/cycling route so that it ends where it intersects with the central public square” and; removal of the “northern most section of the westernmost local pedestrian/cycling route where it intersects with the central green grid route towards the sites red line boundary.” These proposed changes are noted. Further comments are provided in this Statement to respond to the issues identified by the Inspector at paragraph 10.1.
 - MM280 proposes a new design principle that requires that development “comply with the requirements of the Millwall Inner Dock tall building zone designation (as set out in Policy D.DH6) where tall buildings are proposed”. This proposed addition is noted. Wording to this effect would provide clarification regarding the approach to building heights; the Council is though proposing changes to the wording of the Millwall Inner Dock tall building zone designation (MM70). As such the proposed change is for now noted and will be discussed as part of the Hearing sessions.
 - MM280 also proposes changes to the second bullet point of the Design Principles set out at p230. Similarly, the changes, which appear positive, are for now noted and will be the subject of further discussion at the Hearing sessions.
 - MM281 proposes to amend the infrastructure Requirements (p230) by deletion of the word “centre” and insertion of the word “facility” so that it reads “Health Facility (re-provision and expansion)”. The change is noted. It is requested that the distinction between “centre” and “facility” in this context is explained.
4. As noted above at paragraph 3 the proposed changes are noted but in several respects do require further consideration / clarification in order that the wording that is carried forward to the adopted Plan provides for a robust basis against which development proposals can be assessed.
 5. For the avoidance of doubt the comments submitted on behalf of ABPL set out in the original representations still stand.
 6. The Isle of Dogs and South Poplar area offers significant opportunity for growth in terms of housing numbers and employment. This reflects its Opportunity Area status and the nature of development activity that has occurred and is likely to take place in the years to come.
 7. The area has long been identified in the London Plan as one of London’s Opportunity Areas to where growth should be directed. The draft Opportunity Area Planning Framework (see p221 and MM268 as above) that has been published by the GLA for consultation (9th May 2018 – 1st August 2018) provides the supplementary planning guidance as to the way the GLA (and TfL) see the area being developed to accommodate the proposed uplift in homes and jobs and the necessary infrastructure provision that goes with this. The draft OAPF states that it has been prepared in consultation with the Council. It is unclear, therefore, why the Council proposed change MM268 seeks to delete reference to the draft OAPF document; this will in due course form the basis of supplementary guidance to the London Plan.
 8. The adopted Core Strategy (2010) and Development Management Document (2013) both set out a vision for the future development of Cubitt Town and Crossharbour District Centre which is Site Allocation number 19 in the 2013 DMD. Page 232 of the draft Local Plan

includes Figure 42: Crossharbour Town Centre. Figure 22 seeks to identify the extent of the site allocation and visually illustrates core development principles e.g. notional pedestrian routes; location of public space etc. The Site Allocation in the adopted DMD includes a similar diagram identifying core principles for the future development of Crossharbour. It will be noted, however, that the diagram in the DMD is not as specific/detailed as that which is now proposed in the draft Local Plan.

9. It is assumed that figure 42 is indicative / illustrative only and does not purport to set out a high-level framework to be adopted by proposals for the future development of the site. Proposed change MM279 is, however, quite detailed in its requirements regarding the extent of, for example, the pedestrian/cycling route across the site. This implies that figure 42 is illustrating something quite specific and set in terms of design principles. Such a prescriptive approach is likely to prove unhelpful to the consideration of subsequent applications for planning permission.
10. Looking at the indicative layout at Figure 42 it is evident that this has been informed both by the grant of planning permission in 2014 for redevelopment of the district centre (PA/11/03670) and the on-going pre-application discussions with the Council. It will be important that, if the Figure remains, the Plan makes it clear that the Figure provides an indicative idea as to the way the site might be developed. It must not be rigidly applied to proposals that might subsequently come forward. Broad principles of, for example, new and enhanced links to Glengall Grove and Mudchute Park are identified and the aspiration of the Council and GLA to deliver these has long been understood. There should, however, be no expectation that the layout identified in the draft Plan is how these principles should be secured.
11. The draft OAPF document also includes, at pp108 – 111, broad principles for the future development of the Crossharbour District Centre. Whilst the OAPF is supplementary guidance to the London Plan it is important that the Site Allocation in the Local Plan is not seen as in conflict with the broad development framework that is set out in the draft OAPF and vice versa.
12. ABPL looks forward to attending the Hearing session to further discuss this matter.

MRPG/DP3625

July 2018

