

Isle of Dogs Neighbourhood Planning Forum Assessment of the:

PA/19/02534/A1

ASDA Crossharbour 151 East Ferry Road, London, E14 3BT
application



LBTH ref: PA/19/02534/A1

As at the 24th May 2021 Formal submission v1

Key Issues

We welcome re-development of this site but have a number of concerns about this planning application and remain unconvinced why it needs to be so much bigger than previously approved schemes given the quantum of development in the immediate area.

At the Westferry Printworks Planning Appeal on the 18th May 2021, Gwion Lewis QC acting for Tower Hamlets Council confirmed that the Neighbourhood Plan was now part of the Councils development plan as regards that appeal. This was confirmed in a note on the 19th May which said ‘the vote in favour of the NP means that, under s. 38(3A) of the Planning and Compulsory Purchase Act 2004, the NP automatically becomes part of the development plan without the need for any further formal steps to be taken.’ This site is within the Neighbourhood Plan area.

But it is not possible for us to comment on whether or not the application complies with the Neighbourhood Plan as we cannot find within the documents key information. For example we cannot find (as of 24th May) the following:

- An Infrastructure Impact Assessment
- Compliance with the GLAs Housing SPG
- Any comment on Home Quality Mark nor BREEAM status
- Whether a 3D model was submitted or not and whether it was compliant

But we can see that the Construction document does not mention the Neighbourhood Plan nor its policies. And it is suggested that the eventual CEMP will not comply with our Policy CC3.

We would accept an argument that our Policy ES1 Empty Sites should not apply given the special issues related to the ASDA store but we cannot see where that argument has been made.

See below the Summary of Policy Relevance and Compliance to the Neighbourhood Plan from page 9.

Wider planning comments

But we also have key issues with the following planning issues which are detailed below.

1. Housing Mix Local Plan Policy D.H2

Is the development compliant with Local Plan Policy D.H2 as regards the 1,2,3 bedroom mix? This is an ideal location for family sized homes given the proximity to schools, shops and the farm. That is less clear in other towers like those on Marsh Wall.

2. Urban Greening Factor - London Plan Policy G5 Urban Greening

Is only 0.34 versus a London Plan recommendation of 0.4 for residential sites in London Plan Policy G5 Urban Greening (and this is largely a residential site if you consider the massing of residential versus commercial).

Given that other nearby developments most certainly fail on this policy (if applied retrospectively) we cannot in future accept further failures. And this application is not the only one that will rely on the green spaces at Mudchute Farm.

3. Open Space - Local Plan policy D.OWS3

The application only provides 66% of the open space required in Local Plan policy D.OWS3. It suggests that residents can access the open space at Muchchute Farm etc.

But that ignores every other planning application which all say the same thing.

We know in aggregate that the Isle of Dogs area is not meeting its open space targets even if you include public spaces.

The developer needs to prove that for the Isle of Dogs as a whole that we are meeting the Open Space target of 1.2 hectares per 1,000 residents if it is to escape this policy requirement.

As a reminder APPENDIX “A” (To Planning Code of Conduct)
COUNCIL GUIDELINES FOR DETERMINING PLANNING APPLICATIONS
APPLICATIONS UNDER THE TOWN & COUNTRY PLANNING

(iv) Material considerations can include (but are not limited to):-

(m) Deficiencies in social facilities, e.g. spaces in schools;

4. Fresh water supply

We are extremely concerned by the 12th February 2021 email from Thames Water (TW) that said;

“Water Comments Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available

Waste Comments With the information provided, Thames Water has been unable to determine the waste water infrastructure needs of this application.”

This follows very similar comments by Thames Water in 2020 as well. The 30th April 2020 Response to Thames Water Comments focussed only on waste water and protecting TW assets, it ignored the fresh water supply issue completely. In fact every document submitted related to water only focusses on waste water or asset protection.

This is an issue that raises profound local concerns. We have met frequently with Thames Water to discuss this issue since at least 2015 but as of 2021 there are still no firm plans to improve the water supply to the Isle of Dogs.

As a reminder APPENDIX “A” (To Planning Code of Conduct)
COUNCIL GUIDELINES FOR DETERMINING PLANNING APPLICATIONS
APPLICATIONS UNDER THE TOWN & COUNTRY PLANNING

(iv) Material considerations can include (but are not limited to):-

(I) Capacity of physical infrastructure, e.g. in the public drainage or water systems;

Also as a reminder the Summary from the Isle of Dogs and South Poplar Integrated Water Management Plan written by AECOM and published in October 2020 said

"The scale of growth planned for the Isle of Dogs & South Poplar to 2041 poses a significant challenge for the delivery of water services infrastructure in the area. Much of the existing infrastructure is close to, or already at capacity; and flood risk and water quality are key concerns in many parts of the area."

We would have expected to see a response by the developer to this water management plan and its recommendations.

5. Loss of Petrol station

We have already lost two nearby petrol stations (Texaco Burdett Road and Esso Leamouth) and another is due to go (BP The Highway), all for new housing. If ASDA goes, it leaves only one petrol station in the E14 post code area (the fastest growing place in the UK) the Texaco on Pepper Street, it is often inaccessible due to queues building up for the Blackwall Tunnel.

If we aggregate development across E14 it is possible that we will achieve a population of 200,000 to 250,000 people with only one petrol station.

The Addendum Transport Assessment 15th January 2021 details reasons for removing the petrol station but not the transport impact of vehicles having to travel further.

It says

“4.1.1 The proposed changes to the development scheme would reduce the site’s travel demand in comparison to the original planning submission, with a significant reduction in car borne travel anticipated as a result of the removal of the site’s petrol filling station.”

Removing the station will move traffic to other roads and destinations and is likely to result in more traffic.

Texaco is also more expensive than ASDA.

The switch to electric vehicles will over time reduce the demand for petrol / diesel and should be encouraged.

But in the meantime there is still demand for fossil fuels and the petrol station should be retained for as long as is possible.

We would have preferred to see the petrol station replaced by a fast charging station, while there will be access to charge points in the car park for shoppers and visitors we would have liked to see a more explicit replacement of the petrol station by a fast charging electric station for non-shoppers especially for commercial EV operators like delivery vans.

We need to retain a vehicle fuel station here even if the ‘fuel’ itself changes.

A poll was conducted from the 19th May on a local Facebook group “Canary Wharf & Isle of Dogs Residents”

It and the 51 comments can be found here

<https://www.facebook.com/groups/1458438024296291/permalink/3027326074074137/>

It clearly indicates an overwhelming preference for keeping the petrol station for the long term and for keeping a dedicated fuel station on this site (regardless of the fuel)

Poll Options	Votes
Retain petrol station to at least late-2030s	600
Petrol station to 2027 then EV fast charger from 2027	111
Replace petrol station with EV fast charger station	59
Remove petrol station	12
Retain petrol station to 2027 (likely date) only	6
Replace with Hydrogen Fuel Station	3
Only have EV chargers for ASDA shoppers	0

6. Car Free does not mean Car Free

Addendum Transport Assessment 15th January 2021 4.3.5 “...On the basis that future site residents will not be permitted an on-street parking permit,”

This is incorrect for three reasons:

- LBTH has a permit transfer scheme which means a proportion of the 3 bed social rent homes will have LBTH parking permits (see Island Point on Westferry road as an example)
- Disabled parking (see further up Limeharbour for examples of regular blue badge parking on the road). While in principle there will be 60 disabled parking bays actual practise nearby suggests that LBTH has not been able to protect on site blue badge parking elsewhere.
- While not permitted, local experience clearly shows that a number of people in car free homes have cars (see Island Point), drive to work and then park near to their homes after the end of controlled parking hours. It is likely that ASDA will see even more parking pressure on nearby streets (see Tiller road and Mellish street as examples) Glengall Grove/St Johns estate and Friars Mead in particular.

The technical reports need to make this clear even if it is not in the applicants gift to control some of these issues as it paints an imaginary picture of actual practise. The s106 needs to protect disabled parking bays in perpetuity. Some consideration should be given to providing residents of Friars Mead with a barrier to stop visitors from entering and to the St Johns estate in terms of parking conditions.

7. Primary School

We note in one Council commissioned document COUNCIL PROGRAMME CONSULTANT REVIEW 20th April 2021 is this comment by Profile Construction Consultants Ltd, our underline.

“1.19. It is noted that there was an allowance for a school and new leisure facilities within the proposal, which have not yet been assessed. We are aware the requirement for the school may not now be needed.”

Tower Hamlets Council has already rejected the need for one primary school under construction (Consort Place) and a number of developers are proposing primary schools but given the unattractiveness of the area to many families (see state of Millharbour) inevitably we will need less schools than the OAPF forecasts and LBTH is closing primary schools in the west of the Borough. Unless LBTH intend to remedy this by making the area more attractive to children and families?

We would therefore ask LBTH to consider;

1. That the new school building be accessible by Cubitt Town primary school whose own buildings are quite old and will need replacement, this could open up more of the Cubitt Town school site for improved sports facilities which can then be made available to primary schools without sports facilities (old Hermitage and new Wood Wharf for example) as well as the wider population out of school hours (see George Greens).
2. Or that the building be used for other social infrastructure, for example a youth centre. The local Scouts group do a fantastic job but with no support from LBTH. And see medical centre comments later.

The planning permission and s106 should retain the flexibility for alternative public use.

8. Police rest facility

The Met Police intend to sell the existing Manchester road Police station by 2024, the Borough Commander recently told Police officers at the station that it would be sold (as has been discussed as likely for years). Limehouse Police station is reserved for specialist Police units. Bethnal Green the next closest Police station is some distance away, this would mean the local Police Safer Neighbourhood Teams are homeless or have to commute long distances each day to and from Bethnal Green.

They need access to car parking, a place to change, toilets, power, rest facilities etc. We would ask that the new community centre if approved has some space set aside for them. And that this option be mentioned in planning/s106.

Like that which will be provided for bus drivers on site.

We note that London City Island was supposed to have a Police rest station according to its s106 but I am not aware that this was ever actioned.

9. Cubitt Town Library future?

We welcome the larger community centre in this application but there will be uncertainty in the community about Cubitt Town Library building which is much loved. But Cubitt Town Library is also too small for the rapidly expanding population.

LBTH will need to make clear that if it approves this development what it plans to do with the building.

At least one member of the Forum believes it should become a children's library and the new community centre an adult library. But regardless we do not want to lose Cubitt Town Library as a community asset. An art facility would be a huge asset to the local neighbourhood – community arts for wellbeing.

10. Smaller ASDA store

We are perturbed that the new ASDA will be smaller. 90,414 sq. ft versus current store of 98,958 sq. ft. This makes no sense given population growth and the absence of any other applications for large format grocery stores in the area. If they assume that click and collect will be a more important method of shopping does that not contradict the Council move to reduce the number of cars?

But we think this issue needs more attention as to why, are ASDA aware of the scale of population growth?

Over 60% of shopping trips locally are to ASDA as the population increases (including in affordable housing) surely grocery capacity does too?

11. Sunlight / Daylight Analysis

The Neighbourhood Plan is very supportive of the use of 3D models in planning having seen how they work via demos of the Vu.City model.

But the way sunlight and daylight information is presented to residents and Committees is obtuse, toilsome, opaque, arcane and imperceptible to comprehend. Even if you can read the spreadsheets the language is arcane.

We ask that the Vu.City model be presented at Committee so that Councillors can see the actual visual loss of sunlight/daylight from different vantage points at different times of the day and year and the impact it will make on flora, fauna, and the wellbeing of local residents.

We know this is technically feasible.

It is not sustainable to continue to plan the Isle of Dogs in 2D.

12. District Centre Site Allocation & Local Plan Policy D.EMP2

The Local Plan 2031 Site Allocation says

4.3: Crossharbour Town Centre

Design principles

Development will be expected to:

a. create a new town centre with an anchor supermarket and a range of retail, leisure and community uses with sizes which can support independent providers. Retail streets and other routes should provide active frontages

But we have doubts that this will become a town centre and note our point above about the smaller ASDA store.

The Town Centre & Retail Statement submitted by the applicant 26th April 2021 “Town Centre & Retail Statement Crossharbour District Centre” says

- *Small retail units spread across the site.*
- *Incentivising new retailers to locate to the site through subsidised or stepped rents, rent free periods, assistance with fit out of units.*

But does not mention Local Plan D.EMP2 “4. Within major commercial and mixed-use development schemes, at least 10% of new employment floorspace should be provided as affordable workspace.”

The Isle of Dogs needs a proper town centre but a range of small units and a smaller anchor centre. We worry that the desire of ASDA to avoid competition will dominate.

We need more evidence that there will be a range of retail and not just ASDA plus some coffee shops. This may be difficult to achieve via use classes but we need more detail or a condition added to ensure that the range of retails includes bakers, butchers and candlestick makers.

13. Environmental impact assessment Local Plan Policy S.ES1

This is next to a very sensitive site, Mudchute Farm that contains an abundance of wildlife as well as domesticated animals including rare breeds. Plans should “be supported which minimise the use of natural resources and work proactively to protect and enhance the quality of the natural environment” to quote Local Plan Policy S.ES1

We remain to be convinced that this scheme does so.

Light & noise pollution on the animals are also concerns, and we note the horses had to be moved during Oktoberfest because of the noise from late night parties.

We think the application needs an independent environmental assessment of the impact on wildlife and the farm. And perhaps a condition be added, marking out that developers are not allow to impede or impact the surrounding environment.

14. Protection of Trees Local Plan Policy S.ES1

Mature trees are routinely cut down well in advance of work starting and often in places where they could be saved (perhaps by pruning them back so as to not impact construction). Developers just see them as a nuisance and not a vital asset. The construction management plan needs to be more explicit about when & why each tree needs to be cut down especially on the northern boundary where many mature trees exist. See Bethnal Green Mulberry Tree campaign!

15. Site Boundary with Friars Mead and Glengall Grove & construction impact

Confirmation is required that the existing metal fence that separates ASDA from Friars Mead is the actual boundary of the site and that no building, removal of trees, shrubs, etc. will take place east of this fence. It is stated in one of the documents but it is not clear that this will be legally enforceable and should be added as a condition. In addition, that the replacement brick wall for this fence will be built at this exact location, no further east and again that the existing protective barrier of trees and earth will not be removed or disturbed in the creation of this wall. Lastly, that this wall will be put in place early on in the project to protect the local community as much as possible from construction noise and disruption.

The same issues apply even more so to Glengall Grove on the north side. The Construction Plan needs to make clear how residents of Glengall Grove will be protected from construction given that they do not have the same green barrier as Friars Mead.

These issues apply post-construction as well, a supermarket car park has a very different impact on neighbours then a very large residential scheme towering above you and a school.

16. Flood Protection Local Plan Policy D.ES4

Note the map on Page 163 of the Local Plan 2031. It shows Friars Mead and the St Johns estate to be in the Critical Drainage areas. Also see the Isle of Dogs and South Poplar Integrated Water Management Plan and its flooding concerns.

And lastly the Thames Water email of the 12th February 2021 and its concerns and suggested remedies.

We would re-inforce the Thames Water requests and ask that they be added as conditions. And would add that final permission is not granted until Thames Water and the applicant have met to discuss the issues in detail given repeated TW comments about a lack of a discussion.

17. Site Allocation Local Plan Crossharbour

The site allocation in the Local Plan says, “The health centre and community facility should be re-provided in association with the new community/local presence facility.”

Infrastructure requirements - Health facility (re-provision and expansion)

But this did not happen, this leaves the existing NHS facility (owned by a charity set up by the LDDC) and its car park stuck on its own as a kind of orphan. Greater efforts should have been made by the applicant, LBTH and the NHS to re-provide the health centre in a new, larger, one floor only facility in the new building and use the existing space for public use, perhaps as a new park and playground.

This can still be done by integrating the new school, medical facility on the ground floor and classrooms etc above.

Neighbourhood Plan comments

Timeline – Neighbourhood Plan versus Application

The Isle of Dogs Neighbourhood Plan was submitted to the Council on 23rd October 2019. On 18th December 2019, the Mayor in Cabinet agreed that the submission met the statutory requirements for neighbourhood plans, and should proceed to a Regulation 16 consultation and independent examination. The Regulation 16 consultation was held between 9th January and 19th February 2020.

The Isle of Dogs Neighbourhood Plan Examination report was issued on the 14th April 2020 and was approved to go to referendum by Mayor John Biggs on the 12th May 2020. It has had significant weight in the planning system since 12th May 2020.

The Neighbourhood Plan was then approved at referendum on the 6th May 2021 by 86% of eligible votes. The agenda issued on the 11th May 2021 for the Councils AGM on the 19th May indicated that unless there is a legal challenge that the Plan will be Made on the 1st July 2021 by LBTH.

But the vote in favour of the NP means that, under s. 38(3A) of the Planning and Compulsory Purchase Act 2004, the NP automatically becomes part of the development plan without the need for any further formal steps to be taken as per the note from LBTH to the Westferry Printworks planning appeal on the 18th and 19th May.

This planning application was registered as valid on the 2nd January 2020 but has seen a number of material changes in the following months e.g. the petrol station and on the Council planning portal new documents are still being submitted on the 14th May 2021 i.e. Design & Access Statement revised content, there must be at least a hundred changes after the Neighbourhood Plan was approved by the Examiner in April 2020 and then granted significant weight in May 2020.

We would therefore expect this application to demonstrate its compliance or otherwise with the Neighbourhood Plan. At the Westferry Printworks Appeal on the 18th May 2021, Gwion Lewis QC acting for Tower Hamlets Council confirmed that the Neighbourhood Plan was now part of the development plan as regards that appeal.

Summary of Compliance

The application site is wholly within the Neighbourhood Plan area and is of sufficient size for all of its policies needing to be considered except for RB1 as not applicable.

Summary of Policy Relevance and Compliance to the Neighbourhood Plan

Policy	Relevant to this application?	Compliant with Neighbourhood Plan	Comment
D1 Infrastructure Impact Assessment	Yes	Unknown	Issues with quality of data as schools data is inaccurate or misleading. It names three nearby secondary schools; all are across the other side of the river Thames.
D2 High Density Developments	Yes	Unknown	Cannot find any analysis
ES1 Empty sites	Limited	Unknown	See comments below
CC1 Construction co-ordination	Yes	Unknown	CEMP to follow but documents make no reference to this policy
CC2 Construction communication	Yes	Unknown	CEMP to follow but documents make no reference to this policy

CC3 Control of dust	Yes	No	Documents say they will refer to GLA SPG but do not use the words comply
SD1 BREAAAM	Yes	Unknown	Cannot find
SD1 Home Quality Mark	Yes	Unknown	Cannot find
3D1 3D Model	Yes	Unknown	Cannot find
RB1 Residents ballot	No		Not applicable

For the sake of clarity, the Neighbourhood Plan policies are in *Blue Italics*

POLICY D1 – INFRASTRUCTURE IMPACT ASSESSMENT

A. To support Sustainable Development and in view of the strain on Infrastructure in the Area and the shortage of publicly owned land, applicants for residential developments exceeding 1,100 habitable rooms per hectare in locations with a PTAL of 5 or less are required to complete and submit an Infrastructure Impact Assessment as part of the planning application.

Does the development exceed 1,100 hab rooms & PTAL 5 or under?	We believe so, PTAL is 4 to 1B according to TfL
Has an Infrastructure Impact Assessment been completed?	Unknown

Comment

We cannot find an Infrastructure Impact Assessment. There is some detail about transport and schools although the data in that is either inaccurate or irrelevant (it mentions 3 nearby secondary schools as being local but they are on the other side of the river Thames, it assumes Canary Wharf College Secondary is already in a new building at Westferry Printworks, other school data does not match schools data). Evidence can be provided for this.

B. Where the Infrastructure Impact Assessment indicates that there is sufficient planned and delivered Infrastructure capacity to support proposed densities, the proposal will be supported.

Comment

See comments above.

C. Where the Infrastructure Impact Assessment indicates that there is insufficient planned and delivered infrastructure capacity to support proposed densities then potential improvements to Infrastructure capacity should be assessed and proposed, having regard to the CIL

contribution that the development will make, and the requirement for planning obligations to be necessary, directly relevant, and reasonably related in scale and kind to the development.

Comment

See comments above.

POLICY D2 – HIGH DENSITY DEVELOPMENTS

Planning applications for residential developments exceeding 1,100 habitable rooms per hectare in locations with a PTAL of 5 or less shall specify how they conform to paragraphs 1.3.51 to 1.3.52 of the GLA’s Housing SPG, and not only that they are of a high design quality. Applications that do not adequately demonstrate this will be considered unacceptable.

<i>Does the development exceed 1,100 hab room</i>	<i>We believe so</i>
<i>Does the application specify how it confirms to the GLA Housing SPG</i>	<i>Not known</i>
<i>Does the application demonstrate conformity to the SPG?</i>	<i>Not known</i>

Comment

We have not yet found a summary in the application detailing how the developer believes that they have met the specifications in the GLA Housing SPG.

POLICY ES1 – USE OF EMPTY SITES

To support Sustainable Development in the Area and the productive use of available land:

- A. Applications for Strategic Development should submit a feasibility study for one or more potential meanwhile uses on their sites (including for existing buildings) which could be implemented – whether by the applicant or by third parties – if the development is not begun in accordance with the substantive planning application for more than twelve months after gaining final planning consent*
- B. An obligation will be made part of any Section 106 agreement on Strategic Developments within the Area, stating that the length of planning permission will be extended to five years if the developer takes reasonable endeavours to make the site available for a meanwhile use within twelve months of the substantive planning application gaining consent. If such reasonable endeavours are not made, the permission will remain at three years.*
- C. If a proposed meanwhile use requires planning permission, this will be the subject of a separate planning permission.*
- D. Such meanwhile uses should be for one or more of the following purposes, subject to site specific constraints:*
 - Temporary pocket parks*
 - Affordable workspace or housing*
 - Temporary farmers’ markets or commercial markets*
 - Pop-up retail and/or restaurants*
 - Cultural and sporting activities*

- *Public art and lighting installations*
- *Other purposes agreed with LBTH*

Such sites should be used for meanwhile uses on the basis that they can be recalled by the developer to build out the development in accordance with the substantive planning application, on reasonable notice in the context of the meanwhile use to which each site has been put.

Is this a Strategic Development	Yes
Has a feasibility study been undertaken?	Unknown
Has a Meanwhile use been identified?	Unknown

Comment

We have not yet found a summary in the application detailing how the developer believes that they have met this Policy or why it should not apply. Arguably given the existing use and the importance of ASDA staying open throughout then a valid argument could be made to disregard this policy but we cannot find whether this argument has been made.

POLICY CC1 – CONSTRUCTION COORDINATION

To support Sustainable Development in the Area, no construction management plan changes should be agreed unless and until the local community has been publicly notified in advance and has had a reasonable opportunity to be consulted.

Comment

The application contains in the Environmental Statement chapter 6 ‘Development Programme, Demolition and Construction’ some detail about construction and a later CEMP.
But does not mention the Neighbourhood Plan nor this policy.

POLICY CC2 – CONSTRUCTION COMMUNICATION

To support Sustainable Development in the Area, applicants or their relevant contractors shall notify all affected local residents as soon as reasonably practicable: whenever they propose a change to normal working hours or conditions for which they have to seek consent from LBTH; and of such consents being granted.

Comment

Will apply at a later stage of construction but should be referenced in the Construction Management Plan or Chapter 6 of the Environmental Statement.

POLICY CC3 – CONTROL OF DUST AND EMISSIONS DURING CONSTRUCTION AND DEMOLITION

To support Sustainable Development in the Area, construction management plans shall specify how they comply with the GLA’s Dust and Emissions SPG.

Comment

The Environmental Statement Chapter 6 says that a Construction Environmental Management Plan will be submitted at a later date. But in section 6.76 it says “Reference would be made to the Greater London Authority (GLA) Supplementary Planning Guidance (SPG) on the control of dust and emissions during Construction and Demolition” Reference is not the same as specifying how they will be compliant. There is no reference to this Plan nor this policy.

POLICY SD1 – SUSTAINABLE DESIGN

To support sustainable development in the plan Area all Major and Strategic Developments are strongly encouraged to meet the highest levels of design and environmental standards, including:

- *For non-residential buildings, the BREEAM Excellent standards; and*
- *For residential buildings, the Home Quality Mark.*

<i>Is the development Major or Strategic</i>	<i>Yes</i>
<i>What is the BREEAM standard for Non- Residential?</i>	<i>Unknown</i>
<i>Has the Home Quality Mark being used?</i>	<i>Unknown</i>

Comment

The status of the Home Quality Mark is unknown as we could not find it in the application material nor the BREEAM rating (still looking for this as we are sure it is there somewhere).

POLICY 3D1 – 3D MODEL FOR APPLICATIONS

All applications for Strategic Developments must be accompanied by a 3D model and in a form that is compatible with the model used for assessment as part of the development management process.

<i>Has a 3D model been submitted?</i>	<i>Unknown</i>
<i>Is it in a compatible form?</i>	<i>Unknown</i>

Comment

3D models have clearly been used for example in the sunlight/daylight analysis but no reference has been found as to whether LBTH has a copy or whether it is compatible (Vu.City)

POLICY RB1 – RESIDENT BALLOT

POLICY RB1 – RESIDENT BALLOT

A. To support Sustainable Development in the Area by ensuring positive engagement of the directly affected community and to maximise the delivery of affordable housing through maximising the funds available, any landlord or developer pursuing an estate regeneration project which involves the demolition of social homes in the Area will be expected to apply for GLA grant funding and, if successful, must comply with the GLA's funding requirements, including without limitation the GLA's Resident Ballot Requirement Funding Condition.

B. Where GLA funding is not granted, estate regeneration projects that include the demolition of social homes will still be encouraged to hold a ballot of affected residents in accordance with the guidelines provided by the GLA for such ballots.

Comment

Not applicable

COMMUNITY ASPIRATIONS

These are not land use policies, but they have been included here for completeness.

ASPIRATION ER1 – Estate Small Business, Retailers, and Community Organisations

Not applicable

ASPIRATION ER2 – Public Reinvestment

Not applicable

ASPIRATION GR1 – Helping Establish New Residents' Associations

Not applicable

ASPIRATION AQ1 – Air Quality

Applicable – given the size of the site and its close proximity to existing very dense residential areas we hope that all can be done to meet this aspiration.