

GREATER LONDON AUTHORITY
Development, Enterprise and Environment

Isle of Dogs Neighbourhood Planning Forum
12 Neptune Court
Homer Drive
London
E14 3UQ

Our ref: LDF30/LDD21/SG01
Date: 19 April 2017

Sent by email to isleofdogsnpf@gmail.com

Dear Sir/Madam,

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations
2012**

**RE: Isle of Dogs Neighbourhood Planning Forum - Draft Neighbourhood
Plan (Regulation 14) Consultation**

Thank you for consulting the Mayor of London on the Isle of Dogs Draft Neighbourhood Plan. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. This response highlights elements of the draft document which could raise issues of non-conformity if not addressed and provides some more general comments and suggestions.

The National Planning Practice Guidance sets out that Neighbourhood Planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next ten, fifteen, twenty years in ways that meet identified local need and make sense for local people. The Isle of Dogs Neighbourhood Area is located entirely within the Isle of Dogs and South Poplar Opportunity Area and given the importance of the Opportunity Area to London's housing and employment growth, the development of this Neighbourhood Plan alongside the emerging Tower Hamlets Local Plan and Opportunity Area Planning Framework is welcomed and the objectives and vision of the Plan are strongly supported.

The GLA's comments are set out below and include representations from Transport for London (TfL).

General Comments

The Draft Neighbourhood Plan currently takes the form of three separate but interrelated documents: the Policy Document, the Back up document and a separate Estate Regeneration Briefing. It is understood that the 'Backup' and 'Policies' documents will be combined following consultation. To create a holistic and sound plan with a strong narrative, it is recommended that the policies are set out in response to context and justification in this combined document. It is also recommended that some of the non-planning matters such as the Estate Regeneration guide become an annex to the Neighbourhood Plan. The proposed approach of a 'quick plan' and a 'longer plan' is interesting and understood to have been as a

result of the need to urgently address local issues. However, it is recommended that as many of the policies as possible be included in the plan to reduce duplication of effort in testing and approving the plan at Examination in Public.

The 'Backup' document provides useful context to the rate and pace of development change in the plan area and the stated vision and objectives of the document to ensure that communities continue to enjoy a high quality of life are fully supported. However, further narrative could be added to the deprivation section as this is one area where the Neighbourhood Plan could target specific policy interventions at a very local level. It should also be noted that the Isle of Dogs & South Poplar OAPF is due to be published for public consultation in Summer 2017 and adopted by Autumn 2017.

The plan would also be strengthened through the use of maps and diagrams describing the existing context and spatial implications of the policies. Within the quick plan, this could be used to identify potential projects / areas for additional focus in the long plan (such as identifying empty sites and public realm projects). It is recommended that this make reference to the emerging OAPF place-making and local connections strategy.

The development statistics outline the permitted and emerging development proposals which have been used to inform population projections. These calculations use occupancy assumptions which are lower than those recorded in the census. The need to acknowledge demographic change is supported, and it is recommended that rather than making assumptions on the future occupancy rates, this is identified as an area where further evidence and monitoring is required to ensure adequate and timely social infrastructure provision.

As part of the OAPF, TfL has been working closely with GLA and the Council to develop a comprehensive transport strategy for the area to address key challenges, for example around crowding, congestion, connectivity and severance, as well as specific issues around construction and freight. In addition to this an emerging Local Connections Strategy and Design Guide has been developed to sit alongside the OAPF. This will look to address the barriers to active travel in the OA, as part of the wider package of transport measures to support both the existing communities as well as the proposed growth in the area over the twenty year OAPF plan period.

Comments on Policies

Density (D1, D2)

It is acknowledged that high density residential development and resulting strain on infrastructure on the Isle of Dogs is an important issue for this plan to tackle. However, it is unclear how policy D1 would work from a development management perspective, as it also stipulates that the policy would relate to demonstrating how 'all existing and approved developments' have also met their infrastructure requirements. It is also unclear what the evidence base for demonstrating this would entail, which would be necessary to find this policy 'sound'. While the provision of infrastructure is a key concern for the Plan area, this policy as drafted could potentially limit all new development coming forward and as such raises a potential issue of general conformity with the London Plan, which seeks to optimise housing delivery.

These policies might be complemented by some spatial element with the results of the OAPF DIF study, when available, which would allow for a co-ordinated and more specific set of infrastructure asks for each site.

It is not necessary to repeat the Housing SPG in policy D2. However, perhaps further interpretation as to how this might be applied in the plan area could make for a more specific and sound policy.

CIL (C1, C2, C3, C4)

There is some repetition of existing planning policy in this section and it is not clear that all of these policies relate to development matters. There are also concerns relating to the conformity of the proposals with CIL regulations.

Further discussion is recommended on how the final policies will be reflected in the OAPF delivery chapter.

Estate regeneration and residents' associations (ER1 to ER9, GR1)

The plan contains many detailed policies relating to estate regeneration (ER1 to ER9). Many of these policies aim to address housing management rather than planning matters. The Mayor of London is seeking to improve estate regeneration processes in London and encourages 'full and transparent consultation' with residents as part of estate regeneration process. This is set out in 'Homes for Londoners: draft Good Practice Guidance to Estate Regeneration' which should be referenced in this document:

https://www.london.gov.uk/sites/default/files/draft_affordable_housing_and_viability_spg_2016.pdf

Policy GR1 relating to establishment of new residents' associations is another policy which better relates to housing management issues rather than traditional planning policies. Although the typologies of high density residential units coming forward within the plan area could potentially justify a more unique approach to management which may also be able to deal with issues relating to build quality and insurance. It may be possible to require a housing management plan to be secured by condition (although this would need to be evidence based).

Empty sites (ES1)

This policy is welcome given the pressure on land uses and lack of open space in the Plan area, however it might be appropriate to provide further information on how this would be applied.

3D Model (3D1, 3D2)

The aspiration to develop a 3D model for the Plan Area is in line with GLA proposals to create a London-wide 3D model. As the GLA is currently looking to commission a model, it would be beneficial to make any future model compatible with a wider GLA model.

However, the wording of this policy should be more specific to ensure it is clear how exactly the model would be used for planning purposes and what part the developer is meant to play in funding its development and ongoing management.

Broadband (BBA1, BBA2, BBA3)

The supply of broadband to homes is a commercial matter unless the policy is making specific infrastructure related requirements on sites. The new London Plan is proposing Policy SI 1 Digital Connectivity Infrastructure, which will facilitate the provision of the digital connectivity infrastructure a modern world city needs. The policy will set out that in collaboration with providers, developers and other key stakeholders, the Mayor will develop guidance/good practice to increase awareness and relevant capability amongst London boroughs and developers on the effective provision of digital connectivity.

In terms of development management, the policy will set out that the development should aim for greater connectivity speeds than set out in Building Regulations across London in order to maximise future-proofing and ensure London's global competitiveness. It will also set out that development should ensure that sufficient ducting space for digital connectivity infrastructure is provided. Additional requirements with regards to communications access and security may depend on the type of the development. And that development should support the effective use of the public realm (street furniture, bins, trees, etc) to accommodate well designed and located mobile digital infrastructure.

It is recommended that this emerging policy be referenced in the neighbourhood Plan and also that these matters could also be included for resolution within a housing management plan or as part of the developer forum (to be set up through the Freight and Delivery work – see below).

Construction Management and Communication (CC1, CC2, CC3)

A core aspiration for the OAPF will be to understand and address the impacts of construction, delivery and servicing freight. TfL is working closely with the Council to develop a strategy for the area, including coordinating the private sector and enabling communications with local residents. As part of this strategy consideration to a variety of mitigation measures will need to take place, including the role of river freight and consolidation centres.

Sustainable Design & Air Quality (SD1, AQ1)

The Mayor welcomes the draft Plan's focus on protecting the environment and health. However, it is unclear how draft policy on air quality and sustainable design can be implemented on technical grounds and whether this approach would affect the viability of development proposals.

A formal opinion on general conformity will be issued when requested at proposed submission stage. Before then, we forward to continuing to engage with you on this emerging Plan to ensure its relationship with the draft OAPF. It would be useful to discuss some of the issues raised in this response in more detail in the coming weeks, particularly to provide an update in the findings of the Development Infrastructure Study.

In the meantime if you have any specific questions relating to this response, please do not hesitate to contact either me or Shelley Gould.

Yours sincerely

A handwritten signature in black ink, appearing to be 'JP', with a long horizontal flourish extending to the right.

Jennifer Peters
Strategic Planning Manager

Cc Unmesh Desai, London Assembly Constituency
Tony Devenish, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL