

Sadiq Khan, Mayor of London
Greater London Authority
City Hall
More London Riverside
The Queen's Walk
London
SE1 2AA

Planning & Building Control
Development & Renewal
Tower Hamlets Town Hall
Mulberry Place
5 Clove Crescent
London E14 2BG
Tel: 020 7364 5000

By email:
yourviews@london.gov.uk

9th December 2016

Dear Mayor Khan,

Re: Consultation on 'A City for All Londoners'

Thank you for giving the Council the opportunity to respond to the Greater London Authority's 'A City for All Londoners' Consultation that closes on 11th December 2015.

Firstly, we acknowledge that this is a summary document which seeks to outline a broad vision as well as the main opportunities and challenges facing the capital, and we welcome the direction it provides. However there are a number of important issues for our borough which the document touches on, and on which we expect emerging documents to provide greater clarity. We have therefore provided comments on these issues, with the expectation that they will be addressed in emerging strategies, including the London Plan redraft.

Accommodating Growth

LBTH understands the pressing need to deliver more housing in London and this is reflected in the significant contribution the borough has made towards delivering London's housing targets. However, the ability to deliver this high level of housing growth is constrained, due to growing pressure on transport and social infrastructure, which sec106 and CIL contributions are unable to alleviate. Without significant regional investment in these areas, the current London Plan (2015) growth targets will be unsustainable.

Given that Part 1 also outlines the intention to bring forward all Housing Zones to full capacity, which would include the Poplar Riverside Housing Zone in the borough, and that this would be in addition to the anticipated development on the Isle of Dogs (as is being explored in the emerging OAPF) and the large quantum of development anticipated elsewhere in the borough, including in Whitechapel and the City Fringe, extensive funding of transport and social infrastructure will be required.

LBTH looks to the London Plan and other emerging strategies to identify how the level of growth expected to be accommodated in the borough will be supported through the funding and delivery of the required infrastructure. We also suggest that now is an opportunity to reconsider London's spatial strategy, beyond the existing City in the East and City in the West. Whilst this document is clear that the intention is to deliver London's growth within its boundaries, this appears to be a missed opportunity to undertake an up to date assessment of the role and function of the Green Belt in the 21st Century.

At a more local level, LBTH is supportive of the Mayor's intention to deliver further river crossings in the east of London, and welcomes the recognition of the opportunity for crossings to the east and west sides of the Isle of Dogs. The Council looks forward to further discussions with the GLA, TfL and other stakeholders regarding the best way to improve connectivity over the river in this location, and how these strategic links can be funded and delivered. In addition, LBTH would like to encourage the Mayor to consider the river crossings in conjunction with the wider infrastructure improvements needed to support the major development on the Isle of Dogs, which includes residential units and employment floorspace. Further collaborative work through development of the OAPF and the associated DIF Study on this is welcomed.

Housing

LBTH shares the view expressed in this document as to the need for more housing in London, and for that housing to be truly affordable for ordinary Londoners. We are extremely supportive of the 50% affordable housing target. We will provide more detailed comments via the consultation on the Affordable Housing SPG with regards to the proposed forms of affordable products and the proposed delivery mechanisms.

LBTH is also pleased to see an acknowledgement of key emerging trends in London, including "build to rent" and "buy to leave". We are in agreement that further research is required in order to inform sensitive policies which can help manage these developments to shape a housing mix which meets the needs of Londoners.

Whilst we also agree that the delivery of further housing will require higher density developments, we would also welcome recognition that there are many successful high density typologies that are not tall buildings. This is of particular importance given the identified difficulties of delivering affordable and family housing within tall buildings. In addition, in order to ensure sustainable and liveable neighbourhoods, residential capacity must take account of local

infrastructure capacity and place making and design concerns, including historic environment designations. We are concerned therefore by the seemingly blanket support for high density development around transport nodes. Instead we would expect the London Plan to provide a more nuanced approach which acknowledges existing local constraints. We are aware that the GLA is currently undertaking further work around tall buildings, and as a borough with a large number of tall buildings and high density schemes, we are very aware of the limitations of relying on boroughs in isolation to manage the future shape and form of this world city. We would therefore urge the GLA to set up a joint working group with the boroughs to undertake a detail study of tall buildings and high density schemes. This will enable everyone involved in developing a strategic vision for the city to fully understand the opportunities and challenges tall buildings and high density schemes present, from design, infrastructure capacity and housing need/affordability perspectives, and to jointly shape a future policy direction for London.

Finally, whilst we acknowledge that this is broad vision document, we are extremely interested in understanding any proposed delivery mechanisms, beyond Housing Zones and the use of public sector land. We look forward to greater detail on proposals to speed up housing delivery at the rate required to meet needs.

Economy

LBTH welcomes the commitment to ensuring that, despite the need for housing, London's economy still receives the priority and space it needs to grow. In light of Tower Hamlets' role as home to two of the main employment locations in London – Canary Wharf and the City Fringe – we support the emphasis on the importance of London's economy. We would welcome more strategic policy guidance on this, in the new London Plan, including a strong policy position on the need to protect employment uses in these areas. On industrial land, we would also welcome further clarification. It is our understanding that the GLA commissioned as well as our own commissioned evidence base identifies a strong demand for, and reducing supply of, industrial land within London. However, this document suggests that there is industrial land which 'may be surplus to current needs'. We would strongly urge the ongoing retention of industrial land, given the importance of retaining a diverse economic base in London.

LBTH welcomes the commitment to mixed use development and the promotion of employment space throughout the city. However we would welcome further clarity and a greater nuance in approach to mixed development which recognises that not all locations are suitable and that there are different and more innovative forms of mixed development. We need to avoid the proliferation of empty ground floor retail units within residential developments, which has been a by-product of this policy.

LBTH also supports the Mayor's ambition regarding the cultural capital, including the greater protection and encouragement of creative workspaces, venues and the night time economy. We have a significant number of cultural businesses in

the borough, developing in key clusters, which we are seeking to protect and promote. We consider it vital that these are also recognised and supported at a regional level and see the forthcoming Culture Strategy and Creative Enterprise Zones as providing an important opportunity to do so. We look forward to commenting on the detail of these proposals, as well as the forthcoming Night Time Economy SPG.

Finally, LBTH notes the Mayor's ambition to work collectively with partners to upgrade and extend London's infrastructure. The council would be keen to work with the GLA, other London boroughs and public/private infrastructure providers to promote the delivery of common strategic infrastructure requirements.

Environment, Transport and Public Space

Given the level of development expected in the borough, and the existing transport capacity constraints, LBTH views the delivery of further transport capacity as crucial to enabling the borough to deliver its housing targets.

Tower Hamlets supports the proposal to deliver Crossrail 2, as the evidence clearly demonstrates that this will unlock significantly more employment, housing and regeneration. However, LBTH consider that for the full potential of Crossrail 2 to be realised, the Eastern Branch must also be delivered. In addition we are concerned by the wording in this document which states that the Mayor would like to work with partners to get the funding in place to deliver Crossrail 2, as this suggests a call for the further use of Mayoral CIL to exclusively fund Crossrail and Crossrail 2. It is our view that whilst Crossrail 2 is a significant infrastructure project, LBTH is due to deliver the highest number of housing units in the country in a restricted area and there are extensive strategic infrastructure requirements beyond Crossrail 2. Therefore it is hoped that this full range of strategic requirements will be met through the resources available to the Mayor.

LBTH welcomes the acknowledgment in the document of the need to change the way we travel and reduce road pressure. However we would like to highlight two important omissions in the discussion presented in the document. Firstly around use of the river – whilst suggestions are given to shifting lorry consolidation centres closer to the river – the actual increased use of the river for commuting and transportation of goods is missing. Our view is that more work is needed to make river travel convenient and cheap enough to become a regular, rather than occasional, transport method. Secondly, the transportation of waste. In increasingly high density areas of London the transportation of waste causes significant congestion and is an area of major expenditure for local authorities. There is a need to plan for waste management in a more strategic manner, along similar lines to heat networks, to overcome the difficulties caused by multiple landowners seeking standalone solutions.

This is related to another omission in the document, which is the broader management of waste across the city via waste apportionment targets. We recognise that it is an important sustainability principle for London to manage its own waste. However, the current apportionment targets create conflicts with other policy requirements, in particular housing targets, particularly for Opportunity

Areas, Intensification Areas and Mayoral Development Corporations. The new London Plan provides an opportunity to reconsider these apportionment targets to better reflect changing land use across London.

LBTH welcomes the commitment to taking strong action to improve London's air quality. The whole of Tower Hamlets is an Air Quality Management Area, primarily as a result of the pollution from the TLRN roads which transect the borough. We would therefore urge the GLA to prioritise Tower Hamlets for any air quality improvement projects. We are also pleased to see the commitment to Zero Carbon, especially in light of the uncertainty stemming from Central Government on this agenda. We will look to the GLA to provide support to boroughs who wish to pursue this goal.

Finally, LBTH has a question relating to the London Infrastructure Plan 2050, and whether this will continue to be brought forward as a separate strategy, or embedded within the other emerging strategies.

A City for all Londoners

LBTH welcomes the principle of 'Good Growth', which appears to focus on the same key issues as our own Draft Local Plan Objectives of Managing Growth and Sharing the Benefits. It is clear we have both identified the same key concerns regarding the level of growth London is required to deliver and proposals on how to ensure London still remains a liveable city for all. We look forward to working together, as both our plans develop, to deliver these objectives.

Finally, we would urge that it is important that the GLA provides a strategic vision for the future of the city not just in terms of growth but the form of that growth. The document provides very little direction or detail in relation to place shaping, design or heritage. This is concerning, as London is a global city with a distinct character. The absence of a spatial, design-based, strategic vision for the city increases the risk of relying purely on components of growth and missing how the growth is accommodated and shaped. This could compromise London's place as a unique global city with distinct character. We would urge the GLA to work with the boroughs to shape this strategic, spatial, vision for London and in that process test the various assumptions about growth, and its location and form, set out within the document.

Yours sincerely,



Owen Whalley
Head of Planning and Building Control



INVESTORS
IN PEOPLE

