

Isle of Dogs and South Poplar Opportunity Area Planning Framework
Public Consultation Report
 October 2019

No	Respondent	No	Comment	Section / page	Action
1	4 Estates Forum	1	The 4 Estates Forum welcome the exclusion of the Barkantine, Kingsbridge, St Johns and Samuda Estates on the Isle of Dogs from the areas set out the OAPF as areas for opportunities for growth on the Isle of Dogs.	General comment	None
	5 Estates Forum	2	The baseline growth scenario of 31,000 new homes for 72,500 by 2041 is not acceptable as the infrastructure of the Isle of Dogs cannot cope with the existing residents and businesses. We appreciate that the proposed 31,000 new homes target includes the 19,500 new homes already given planning permission; however residents really struggle with the current infrastructure, and any further growth without delivering the infrastructure will have a negative impact on the lives of the existing residents of the social housing estates.	General comment	None
2	East End Community Foundation	3	"If the proposed increases in housing numbers of the Draft OAPF are realised, this will result in significant pressure on the already overcrowded public transport system, the parks, libraries and other public amenities of the Isle of Dogs. We would strongly support the provision of additional tube or rail services to the Isle of Dogs to reduce overcrowding and to promote connectivity and access to opportunity. We do not believe that an additional 31,000 homes can be built without additional transport capacity, in addition to the incremental improvements set out in the Draft OAPF."		None
	East End Community Foundation	4	Acknowledge role of workhouse site in OA and Aspen Way SA	Fig 1.3	None
	East End Community Foundation	5	Support new links over Aspen Way subject tonature of link and potential impacts	Fig 2.2, p27	None
	East End Community Foundation	6	Balance between affordable housing, physical infrastructure, CIL contributions will need to be carefully struck	p28/29	None
	East End Community Foundation	7	Housing strategy identifies South Poplar as mid-rise family housing - need to strike balance	p34/35	None
	East End Community Foundation	8	Poplar High Street provision for SMEs - how has it been determined that this location is appropriate for provision? What does blue arrow along Poplar High Street mean? Affordable workspace should be sought across the OA not just South Poplar.	Fig 3.3	Actioned
	East End Community Foundation	9	Align workhouse site requirements with LBTH Local Plan requirements for infrastructure (query reprovision of substations and rationale for that)	p43/43 &58/59	Actioned
	East End Community Foundation	10	Text should not constrain potential for taller buildings - draft Local Plan Policy D.DH6 does not rieve out tall buildings outside of defined zones.	p92-95	None
	East End Community Foundation	11	Reference to 15m width too prescriptive and will hinder sites coming forward	p94/95	None
	East End Community Foundation	12	How practical is it to put together recommendations and not hinder development of OA? Onerous recommendations for studies/masterplans/environmental impacts	section 6, p116-125	None

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3	The PLA is the Statutory Harbour Authority for the Tidal Thames between Teddington and the Thames Estuary. Its statutory functions include responsibility for conservancy, dredging, maintaining the public navigation and controlling vessel movements and its consent is required for the carrying out of all works and dredging in the river and the provision of moorings. The PLA's functions also include for promotion of the use of the river as an important strategic transport corridor to London.	13	It is disappointing given the importance of the River Thames to the OAPF area that the PLA has not been directly invited to provide comments on the consultation.	General comment	Actioned
	PLA	14	The PLA broadly supports the following key opportunities for growth identified on page 8 of the OAPF, particularly numbers 7 and 8 below, and the associated map. However it is disappointing that reference has not been given to the areas Safeguarded Wharves or to encouraging the maximisation of the use of the River Thames for passengers, freight and leisure opportunities and the benefits this would bring to the OAPF area within the key opportunities section. Key opportunities section should be amended to specifically include reference to the River Thames and encourage its increased use e.g: "Enhance the environmental quality of existing green infrastructure such as Mudchute Farm and the Thames. Create opportunities to extend the existing green and blue grids." "Protect and enhance community and heritage assets such as Mudchute Farm, Sailing Club and the dockside character."	p8	Actioned
	PLA	15	The PLA welcomes the inclusion of the Safeguarded Wharves at Orchard Wharf and Northumberland Wharf on the map on page 33 of the draft OAPF which lists permitted and future development sites within the OAPF area. The PLA also supports the reference to the need to consider the use of Safeguarded Wharves as part of the Waste Management Strategy identified within the OAPF (page 63).	p33	None
	PLA	16	More support must be given to the reactivation of Orchard Wharf and the maximisation of use of both wharves, to support the aims of the draft OAPF. Given the scale of future development proposed in this area, the use of the Safeguarded Wharves will help to increase the amount of goods and materials routinely transported on the river, and assist in reducing congestion and improving air quality within the Isle of Dogs OAPF area, helping to meet the challenge to 'manage the performance of the highway network' identified within the draft Transport Strategy.	4.3.2	Actioned

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	PLA	17	Needs to address effective management of construction and freight traffic. The draft OAPF states a coordinated approach is required to actively understand, plan and manage freight across the area. It is disappointing therefore that the OAPF does not appear to fully consider the role that the river can play as part of the solution to construction and freight traffic in the OAPF area. As part of the 'enabling good growth and innovation' section on page 49, innovative use of the river and docks for example, as part of small scale freight and last mile deliveries, does not appear to have been considered. Given the importance and scale of proposed development in this area, this could be a key location for innovative approaches and new technologies to fully deliver on the 'good growth' principles expressed throughout the document. It is further noted on page 52 of the Transport Strategy there is a reference to improved river access as part of freight mitigation co-ordination and the PLA considers this reference should be replicated in the main OAPF document with regards to freight.	p47, p49	Actioned
	PLA	18	The PLA supports the reference to the optimisation of the existing waste transfer station at the Safeguarded Northumberland Wharf on page 58 of the Sustainability and Utilities Strategy but considers that reference must also be made to supporting the reactivation of the Safeguarded Orchard Wharf, which is currently vacant. As noted above, the PLA considers more emphasis could be given to these sites within the OAPF, to support the reactivation and maximisation of use of these Safeguarded Wharves assets within the OAPF boundary.	p58	Actioned
	PLA	19	An indicative potential location for a freight consolidation unit at the North Dock area is shown on the map on page 58. The justification for this location as a freight consolidation unit should be provided and evidence that the use for the River Thames for the transport of materials to, and waste from, the area as part of the solution to improving construction and freight traffic in the OAPF area has been considered.	p58	Actioned
	PLA	20	Section 8, page 143 of the DIF advises that costs associated with possible freight consolidation initiatives are not currently included but further consideration to this aspect is being looked at. The section then goes on to state that the concept of freight consolidation supports making use of alternative modes and vehicle types more feasible, such as bikes, electric vans and rail movements. The PLA considers that the use of the river and docks as part of freight consolidation must also be a consideration particularly with regard to the development of Construction Logistics Strategy quoted in paragraph 8.28 of the DIF.	p143 DIFS	None
	PLA	21	Thames Path – Limehouse to Leamouth - The PLA supports the reference to enhancing the Thames Path from Limehouse to Leamouth and beyond, as well as the references to the proposed pedestrian and cycle crossing between Rotherhithe and Canary Wharf across the River Thames, of which the PLA are involved in ongoing discussions with Transport for London.	p47	None
	PLA	22	Reference is made to improving access to the River Thames and Thames Foreshore. Whilst the PLA supports the reference to improving access to the riverside, there is strictly no right of public access to the foreshore except for navigation (getting in and out of boats) and for fishing and digging of bait. The PLA acknowledges that people access the foreshore, but this is tolerated more than encouraged. In general the PLA is concerned about access to the foreshore for the following reasons: 1.Public safety – the foreshore is dangerous due to tides, soft mud, slip hazards, sharp objects, Weil's disease etc. The public are largely unaware of the tidal nature of the River Thames and the significant dangers that this poses. Every year, the Police, Fire Brigade, RNLI (via the Coastguard) and the PLA has to rescue people who are trapped on the foreshore. 2.Environmental – some of the foreshore provides important habitats for wildlife. 3.Archaeological – there are items and areas of the foreshore which are of archaeological interest. A Thames foreshore permit is only valid for certain locations west of the Thames Barrier up to Teddington whilst searching is not allowed east of the Thames Barrier. Part of improving access to the River Thames and the Thames Path to ensure that appropriate infrastructure is in place. The OAPF must include a reference to the need for future development to provide appropriate riparian life saving equipment such as lifebuoys, grab chains and access ladders along the riverside to a standard recommended in the 1991 Hayes Report on the Inquiry into River Safety. The OAPF must include reference to the need for suicide prevention measures in appropriate locations (such as CCTV and signage with information to access support) as part of any riverside developments.	p58 - sustainability & utility strategy	None

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	PLA	23	<p>The PLA notes in paragraph 4.4.36 of the draft OAPF the reference to a Riverside Strategy which will “consider options and opportunities for managing flood defences, access to the Thames and its foreshore and the provision of the Thames path” The PLA must be consulted on this strategy when available.</p> <p>Page 83 of the draft DIF identifies improvements to the Thames Path to take place between the 2018/19 – 2021/22 financial years. The total costs are expected to be fully funded through CIL/S106 funding sought from developments. The PLA requests to be consulted on any specific proposals for the improvement of the Thames Path in the OAPF area as they come forward.</p>	p65 OAPF & p83 DIFS	None
	PLA	24	On pages 31 and 49 of the Transport Strategy, the PLA supports the reference to improving the Thames Path, enhancing its character and amenity value, and requests to be included in the Thames Path Feasibility Study work looking into the potential for completing the missing links along the Thames Path.	transport strategy	None
	PLA	25	Ref to new pier infrastructure to the east of the Isle of Dogs which will enable new links to Central London, North Greenwich and Woolwich. However the summary section on page 43 which lists the infrastructure required to support growth up to 2041 is missing new pier infrastructure. This must be added to the required infrastructure section of the OAPF under the sustainable transport heading.	p43 & p49	Actioned
	PLA	26	broadly supports the sustainable transport initiatives listed under paragraphs 4.4.9 – 4.4.11F regarding new river bus services, new crossings over the River Lea and Thames (as shown on the map on page 91 of the draft OAPF). Regarding any potential new river crossings, the PLA supports these, as long as they are sited and designed to allow for the continued full range of river uses, and do not negatively effect navigation. The PLA must be involved in any discussions on the proposed new river crossings across the Thames and Lea to ensure that any adverse impacts of the crossings are mitigated. With regard to the proposed crossings across the River Lea highlighted on page 91. It should also be noted that the proposed crossing, east to west from Trinity Buoy Wharf is mapped to go into the currently safeguarded Thames Wharf in the London Borough of Newham. The PLA would welcome discussion on these proposed crossings, at an early stage in their development.	p91	None
	PLA	27	The PLA supports the references in the Transport Strategy regarding making better use of the river for transport, including continually reviewing the operation of the piers to support the movement of people and goods; and the reference to the provision of a new river services pier to the East of the Isle of Dogs to enable direct connections to North Greenwich. The PLA also broadly supports the references on pages 30, 54 and 55 in the Transport Strategy to the proposed new river crossings, including the Silvertown Tunnel, pedestrian and cycling link between Rotherhithe and Canary Wharf and the pedestrian crossings across the River Lea as mentioned above. Broadly the PLA welcomes recognition of the role of improved river services and additional river crossings in improving the public transport network. Subject to full and safe navigational access is maintained. This is in accordance with the PLAs Thames Vision to increase the number of people travelling by river.	transport strategy	None
	PLA	28	Not enough emphasis has been given to the existing water-related clubs and activities in operation within the OAPF area. In addition, there does not appear to be any consideration with regard to the future requirements of these facilities as a result of the planned population increase within the OAPF area. The unique opportunities that are available to encourage and promote water-based activities and sports in this area must be recognised along with the resulting community benefits these activities can bring. The Isle of Dogs and South Poplar OAPF area has a unique sporting identity with regard to the river and docks and this must not be lost as part of this draft OAPF.	Social and Community Infrastructure	Actioned
	PLA	29	Blackwall and Leamouth: The PLA supports the reference under the key opportunities section to making use of Safeguarded Wharves to promote sustainable freight and consolidation. For information it should be noted that Blackwall Radar is a PLA owned radar station located at Northumberland Wharf. It will be important that any tall buildings do not interfere with the operation of the PLAs river radar equipment and the PLA request for reference to this facility is referenced in the OAPF.	p76 designated character areas	Actioned

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	PLA	30	Existing Character, Canary Wharf: Whilst the PLA broadly supports the references under the key opportunities section to seeking opportunities to create visual connections with the Thames, and to completing the dock and river paths for active leisure use, the PLA considers that reference should also be given to protecting and promoting existing water-related leisure activities in this area	p77	Actioned
	PLA	31	Thames Riverfront: As noted above, whilst the PLA supports the majority of the key opportunities listed here, including completing the Thames Path and creating and enhancing visual and physical links to the River. The PLA has concerns with improving access to the foreshore, other than for safety reasons, for the reasons noted above.	p85	None
	PLA	32	Blackwall: The PLA supports the references to the proposed new pier and river services at this location, and the references to improving the Thames Path, noting the PLA's earlier comments on foreshore access.	p91	None
	PLA	33	Canary Riverside: Under the recommendations for this area, it is considered that the PLA should also be involved in the wider masterplan that is identified to be progressed with TfL, Landowners, boroughs and the GLA, particularly with regards to the Westferry Circus area and Thames Path improvements.	p97-8	None
	PLA	34	South Quay: The PLA requests to be consulted on the South Quay Masterplan SPD focused refresh when this comes forward.	p103	None
	PLA	35	Millwall Waterfront: The PLA broadly supports the protection of existing community assets such as the Docklands Sailing and Water sports centre in this character area; this should be expressed where relevant for the other identified areas of change within the OAPF. The PLA also supports the references to connecting missing links in the Thames Path for this area, including the reference to enhanced amenity at the Outer Dock Slipway, and requests to be kept informed of detailed proposals as they come forward.	p105-106	None
	PLA	36	Crossharbour: The PLA requests to be kept informed on the proposed improvements at the Cubitt Town Beach, including improved seating and access to the beach, noting the PLA's comments above regarding access to the foreshore.	p111	None
	PLA	37	PLA request to view and make comments on when available, these include the following: .Freight & Logistics study .Waste Management strategy .TfL feasibility / options study for strategic public transport across inner east London .Integrated Utilities Plan including an Energy Master Plan and an Integrated Water Management Study .Greening strategy .Riverside Limehouse to Leamouth Walking Route study .Legible London strategy .Creative and Cultural strategy Including any consideration around the Trinity Buoy Wharf area .South Dock design and funding study .Area Masterplans including: South Poplar Masterplan, Blackwall, Leamouth, Canary Riverside, South Quay East and West (including South Quay Masterplan SPD refresh), Crossharbour and Millwall The PLA also request to view the detailed delivery plan and funding strategy noted under recommendation three of the draft OAPF and the Riverside Strategy mentioned on page 65 on implementing the key components of infrastructure.	p119 & 65	None
4	Ashbourne Beech	38	Figure 3.3, pp36/37: Can it be explained what the blue arrow to the north of the Centre (running along Pepper Street and Glengall Grove) relates to? It is assumed improved linkages across the Isle but, Figure 2.2, p27 does not include such a link.	Fig 3.3 p.36/37	Actioned

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	Ashbourne Beech	39	The text at p36 states that for Crossharbour there is "...potential for less car-dependent form of development, with a broader range of uses and services with integrated residential communities." This is text that is included in the annex to the London Plan (and has been since 2008) where the summary of the Opportunity Areas is set out. The text was in place at the time of the grant of planning permission in 2014 for the development of Crossharbour District Centre. As such, whilst the broad principle of a less car dependent form of development is acknowledged, it must be recognised that the existing district centre includes a supermarket and associated petrol filling station with a car park of 564 spaces. The 2014 grant of planning permission allowed for over 750 car parking spaces. The emerging proposals are less car dependent than currently exists. The consideration of any fresh application for planning permission must have regard to this existing context.	Car parking at Crossharbour	None
5	LBTH - Local Planning Authority	40	<p>The emerging London Plan sets out an expectation that areabased planning frameworks should clearly articulate the overall vision and long term ambition of the opportunity area. Policy SD1: Opportunity Areas (part A): "To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will..... bring together the range of investment and intervention needed to deliver the vision and ambition for the area"</p> <p>We welcome and support the objectives of how the principles of good growth will be achieved. However, in contrast to the London Plan and other OAPFs, the IoDSP OAPF is lacking a clear long term vision which sets the direction of travel and creates a shared sense of purpose. The emerging London Plan is both ambitious and visionary in nature. The Mayor of London sets out a strong and positive vision for how London should grow and develop over the next 20 years, and the London Plan expects development plans and OAPFs to work towards this shared vision (see sections 0.0.22, 2.1.4 and 2.10.5 of the emerging London Plan). Therefore, the OAPF also needs to articulate a long term, shared vision that reflects the views of stakeholders and local communities and aligns with the principles of good growth, in terms of what the Isle of Dogs will look and feel like in the year 2041. Otherwise, the OAPF could be misaligned to the new London Plan at the point of adoption. A clearly articulated vision will also encourage greater collaboration between partners and provide the long term strategic direction to the future planning of the area. As per other OAPFs (e.g. Old Park & Park Royal, City Fringe/Tech City and Vauxhall Nine Elms Battersea), the vision for Isle of Dogs and South Poplar should be framed in terms of its spatial role in the context of East London (as set out in section 1.1 of the draft framework) and London as a whole. The vision should also aim to reinforce London's position as the world's leading city (as per the London Plan) and its contribution towards meeting London's strategic needs (housing, employment etc).</p> <p>Figure 2.19 of the draft London Plan shows substantial number of areas of deprivation in and around the IoDSP OA, including South Poplar and existing housing estates. In particular, regeneration initiatives in this area should develop a "shared vision" in consultation with local communities (see paragraph 2.10.3 on the new London Plan), to "identify how investment and development should tackle the specific causes of deprivation that impact on the lives of people in the area, while enriching the qualities of the area that make it unique". As such, the vision should assert its intentions to address spatial inequalities across the area. The vision should also be illustrated graphically with an overarching diagram, including broad locations and development quantum, key strategic routes (existing and proposed), town centres and the Central Activities Zone. Previous iterations were based on the spatial vision set out in the Local Plan, which runs to 2031. The vision needs to take a longer term view to 2041.</p>	1.1 London is growing/p 8-9 VISION	Actioned
	LBTH - Local Planning Authority	41	<p>A reference should be included in this section making it clear how 'sustainable development' relates to 'good growth'. This front spread would be a good place to clearly set out exactly what 'good growth' is in relation to the Isle of Dogs and South Poplar, and the New London Plan - maybe in a new text box.</p> <p><input type="checkbox"/> We suggest incorporating the following which is an extract from the Local Plan. This would also help to establish the relationship between the OAPF and the Local Plan early on in the document. <input type="checkbox"/> As the centre of London expands east, Tower Hamlets will embrace its role as the focus for London's growth, making best use of the economic benefits from Canary Wharf, the City and Stratford. The connections between the borough and surrounding areas will be improved whilst maintaining our own distinct EastEnd identity. This growth will be primarily delivered in the Isle of Dogs and South Poplar, the Lower Lea Valley, the City Fringe and at key locations along transport corridors. The benefits of the transformation of our borough will be shared throughout Tower Hamlets and by all our residents, ensuring no one is left behind. <input type="checkbox"/> Tower Hamlets will continue to be home to a wide range of diverse communities. We will support our existing communities and welcome new residents to make their home within liveable, mixed, stable and cohesive neighbourhoods, which provide for a high quality of life. These will contain a wide range of housing types, prioritising family and affordable housing and be served by a range of excellent, shared and accessible services, community and recreation facilities and infrastructure. These will be green, safe and accessible to all, promoting walking and cycling and making best use of our network of parks and waterways including Victoria and Mile End Park; the Thames and Lea river; and our inland dock basins and canals.</p>	1.1 London is growing/p 8-9	Actioned

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	LBTH - Local Planning Authority	42	<p>Given the significance of the IoDSP OA, there is an opportunity to also consider an even wider sub-regional context (as set out in the emerging London Plan), perhaps taking into account some of the observations below:</p> <ul style="list-style-type: none"> o London's OAs are clustered around growth corridors to show spatial development patterns across London and beyond, linked to planned infrastructure improvements, such as Crossrail. These corridors extend outwards from central London through to outer London and beyond into the wider South East (see policy SD3: Growth locations in the wider south east and beyond of the emerging London Plan). o The IoDSP OA forms part of a broader corridor of growth, stretching from the City of London, via the Isle of Dogs and City Airport, along the HS1 high-speed route and river Thames, through to Kent and beyond (known as the "Thames Gateway"). As noted in paragraph 2.1.6 of the emerging London Plan, none of the growth taking place between OAs and growth corridors should be planned in isolation. o Taking into account the above, while the linkages between the Isle of Dogs and other OAs are clearly recognised (section 1.1), the OAPF should establish a stronger link between the OA and the wider growth corridor in which it sits, as per the London Plan. <p>The reference to 'social and transport infrastructure' is useful but needs a little elaboration - if not here, certainly later in the document. What is the definition of social infrastructure within the context of the document? 'Social infrastructure' can mean different things to different people and institutions. E.g. include school and health centres with the context of the LBTH Infrastructure Delivery Plan & Infrastructure Delivery Framework evidence base work.</p> <p>The context map (opportunity in East London) should also show the airport (as per the London Riverside OAPF) and DLR routes. Central London should also be annotated on the diagram as we cannot assume that readers will know this.</p>	1.1 strategic growth context, p10-11	Actioned
	LBTH - Local Planning Authority	43	<p>'It also indicates a direction of travel and provides site specific guidance for developers to bear in mind when drawing up development proposals'.</p> <p>Although we accept the 'direction of travel' wording, we feel parts of this statement are slightly weak and should be strengthened/expanded. For example, should it link to a London Plan policy which these site specific elements are considered to be helping deliver? <input type="checkbox"/> 'This draft OAPF responds to local policies to make a long term plan for the future growth of the OA which responds fully to local community needs while maximising the potential for delivery'. Care is needed over some of the wording used which can conflict at times – for example, is the document a 'long term plan', or a 'direction of travel'. <input type="checkbox"/> Please ensure that the wording within the text box 'Who is this OAPF for?' is aligned to the text set out in part 1.6. As it is, the text box wording could be seen to give the document greater weight than the 1.6 wording. For example, 'specific guidance for developers' is not explicitly referenced in 1.6 and is potentially counter to the 'direction of travel' reference being made. Is the guidance really specific, or is in more high-level guidance? <input type="checkbox"/> Also, would 'take into account be more suitable than 'Bear in mind'?</p> <p>The 'good growth' definition might need a little more in the way of explanation here, particularly in the context of infrastructure. I.e. managing impacts and providing for existing and new populations Poplar? with infrastructure that meets their needs and the needs of the wider catchment. Before 'Who is this growth for', it should first explain what the OAPF actually is, even if just very high level. The first mention of 'what the OAPF is' is in part 1.6. This is already quite far into the document and readers will need to understand this earlier.</p>	1.2 why the IoDSP p12-13	Actioned

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	LBTH - Local Planning Authority	44	<p>The 'SHLAA' should be introduced and explained in this section, maybe as a footnote.</p> <p>The following sentence on page 16 needs further consideration: 'As there are many remaining potential development sites, a higher number of homes could be delivered here in future than previously considered'. □ The indication in the above sentence is unqualified in terms of its exact meaning/evidencing. The number of homes planned for the area is contingent on community consultation, consideration to amenity, preserving infrastructure related uses and it relies on specific consideration to character areas within the boundary of the OA. To infer that there is untapped potential for housing at a higher density in the area without reference to these factors is not in keeping with emphasis based on place-making provided by the LBTH Local Plan.</p> <p>Figure 1.3 refers to enhancing and delivering strategic open space and this is illustrated in the location of Mudchute Park. Are there plans to expand Mudchte Farm? If not then it should say 'enhance'.</p> <p>Within the 'key opportunities for growth' boxes: o Change 'maximise' for 'optimise'. o Clarity needed over the 'reserve' of office employment space. o Although Crossrail and green infrastructure are referenced in these boxes – there is little mention about all other infrastructure types which all underpin growth on the IoDSP – i.e. other transport/movement infrastructure (including walking and cycling), social infrastructure etc.</p>	1.3 p14-15 FIG 1.3	Actioned
	LBTH - Local Planning Authority	45	<p>As per overall comments, we welcome the improvements to this spread. □ Note: there are two 1.3 chapters in the document. Here you say 'London Plan' which we assume is referring to the new London Plan. However, this sometimes isn't clear because in other parts of the document the previous London Plans are mentioned. Consistency is needed throughout the OAPF. □ However, it is noted this in this instance you are probably referring to 'all' London Plans.</p>	1.3 p16-17	Actioned
	LBTH - Local Planning Authority	46	<p>The GLA could go further in this section to develop an outline consultation plan setting out how it will engage with local communities and other relevant stakeholders in the master planning of major development sites and other initiatives set out in this document.</p> <p>The tone here is appropriate, although we are unsure whether the reference to an event that did not have a specific remit to the OAPF led by Mayor John Biggs is required. Best to say that there has been 'full and comprehensive consultation'.</p>	1.4, p18-19	Actioned
	LBTH - Local Planning Authority	47	<p>'Ensuring all development reduces exposure to air pollutants and noise, contributes to London as a zero carbon, zero waste city, improves resilience to climate change impacts and enhances existing green infrastructure'. Although this is an OAPF objective, isn't this more the role of the London Plan to achieve this? There is not enough detail in the OAPF for it to ensure that all development achieves this. Might just need to add the reference 'in accordance with the London Plan...'</p> <p>□ Suggest the following text amendment: 'The evidence base for the proposed levels of potential growth has been robustly prepared and a draft Development and Infrastructure Funding Study (DIFS) has been undertaken which sets out what social infrastructure would be required to support a range of potential growth levels, where it could be provided and how much it would cost.'</p>	1.5, p. 20-21	Actioned

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	LBTH - Local Planning Authority	48	<p>Note: paragraph numbers are '1.6' in this section, not '1.5'. □ Also, a wider comment that paragraph numbers are nowhere else in document – why just here? The diagram is still confusing – it would be worth adding another box around the London Plan, Tower Hamlets Local Plan and Neighbourhood Plan to indicate the 'statutory development plan'. 'The consultation draft is also based...' Again, it should be clarified that the OAPF is supplementary guidance to the 'New London Plan'. 'The draft Isle of Dogs Neighbourhood Plan'. Given the recent outcome of the neighbourhood plan, this wording needs to be updated and phrased differently throughout the OAPF, maybe referring more to a potential future neighbourhood plan. Neighbourhood plans should be treated as plural. Tower Hamlets recently approved the designation of a new neighbourhood planning area in the wider Poplar area, including Poplar High Street and East India Dock Road (a map of the designated area can be downloaded from the following web page: https://www.towerhamlets.gov.uk/lgnl/planning_and_building_control/planning_policy_guidance/neighbourhood_planning/Poplar.aspx). The OAPF should refer to both the Isle of Dogs and Poplar neighbourhood plans. "The London Plan identifies the Isle of Dogs and South Poplar". This is an incomplete sentence. Identifies it as what? 'It will enable the OA to contribute towards meeting London's strategic housing and employment growth in accordance to the principles of 'good growth by looking at Local Plan site allocations in groupings to achieve better planning outcomes and wider objectives. It also has as its focus a key objective to deliver better connectivity and access to opportunities in the Isle of Dogs'. What about infrastructure?</p>	1.6, p22-23	Actioned
	LBTH - Local Planning Authority	49	<p>As regards to the evidence base, no distinction is made between the studies (i.e. the DIFs, Transport Strategy (TS) and Local Connections Design Guide (LCDG) etc) and the separate, interrelated strategies (including social and community infrastructure and sustainability and utilities – see part 4). This distinction is important because it will affect their weight and should be made clearer. I.e. are the DIFS, TS & LCDG really only evidence base, or do they actually form part of the OAPF, as per the diagram in 1.6. □ In relation to the point above, it would be useful to explain how these studies will be used to inform key investment decisions and the determination of planning applications in this area. This section still needs to answer the question of how the document will be used in terms of the growth scenario testing. Not every OAPF takes the same approach as this OAPF in terms of profiling scenarios like this – why was this particular approach applied?</p>	1.6, p22-23	Actioned

No	Respondent	No	Comment	Section / page	Action
	LBTH - Local Planning Authority	50	<p>The emerging London Plan sets out an expectation that areabased planning frameworks should clearly articulate the overall vision and long term ambition of the opportunity area. □ Policy SD1: Opportunity Areas (part A): “To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will..... bring together the range of investment and intervention needed to deliver the vision and ambition for the area”</p> <p>□ We welcome and support the objectives of how the principles of good growth will be achieved. However, in contrast to the London Plan and other OAPFs, the IoDSP OAPF is lacking a clear long term vision which sets the direction of travel and creates a shared sense of purpose. □ The emerging London Plan is both ambitious and visionary in nature. The Mayor of London sets out a strong and positive vision for how London should grow and develop over the next 20 years, and the London Plan expects development plans and OAPFs to work towards this shared vision (see sections 0.0.22, 2.1.4 and 2.10.5 of the emerging London Plan). □ Therefore, the OAPF also needs to articulate a long term, shared vision that reflects the views of stakeholders and local communities and aligns with the principles of good growth, in terms of what the Isle of Dogs will look and feel like in the year 2041. Otherwise, the OAPF could be misaligned to the new London Plan at the point of adoption. □ A clearly articulated vision will also encourage greater collaboration between partners and provide the long term strategic direction to the future planning of the area. □ As per other OAPFs (e.g. Old Park & Park Royal, City Fringe/Tech City and Vauxhall Nine Elms Battersea), the vision for Isle of Dogs and South Poplar should be framed in terms of its spatial role in the context of East London (as set out in section 1.1 of the draft framework) and London as a whole. The vision should also aim to reinforce London’s position as the world’s leading city (as per the London Plan) and its contribution towards meeting London’s strategic needs (housing, employment etc).</p> <p>Figure 2.19 of the draft London Plan shows substantial number of areas of deprivation in and around the IoDSP OA, including South Poplar and existing housing estates. In particular, regeneration initiatives in this area should develop a “shared vision” in consultation with local communities (see paragraph 2.10.3 on the new London Plan), to “identify how investment and development should tackle the specific causes of deprivation that impact on the lives of people in the area, while enriching the qualities of the area that make it unique”. As such, the vision should assert its intentions to address spatial inequalities across the area. □ The vision should also be illustrated graphically with an overarching diagram, including broad locations and development quantum, key strategic routes (existing and proposed), town centres and the Central Activities Zone. □ Previous iterations were based on the spatial vision set out in the Local Plan, which runs to 2031. The vision needs to take a longer term view to 2041.</p>	consultation question - vision?	Actioned
	LBTH - Local Planning Authority	51	<p>‘Sharing the opportunities and benefits of growth with the existing local community including affordable housing’. Why is affordable housing linked to this objective and not the following objective? Also, why only affordable housing and not also access to training, employment, better infrastructure, public realm etc? The phrasing is also unclear – why not the delivery of affordable housing or access to affordable housing? □ The diagram should also show the boundary of the OA</p> <p>2.1 Achieving good growth in the Isle of Dogs & South Poplar 26-27 □ Please see comments on ‘3.2 Housing’ and ‘3.3 Employment + centres’ regarding some of the elements on Figure 2.2.</p> <p>2.2 What are the components of good growth here? 28-29 □ It is still unclear in terms of what is meant by ‘upgrades’ and ‘feasible’ in this context. Please clarify. □ The OA has a high deficiency in open space. The council considers that addressing the open space deficiency should be within Social + Community Infrastructure component.</p> <p>2.2 What are the components of good growth here? 28-29 □ Suggested amendments : Planning for social and community infrastructure to establish what new facilities and upgrades are needed in each of the proposed growth areas of South Poplar, South Quay, Millharbour and Crossharbour and ensuring their delivery. Encouraging community hubs and colocation wherever feasible. Taking an evidenced approach in meeting infrastructure requirements in the key areas of health and education, the support of co-located community hubs and in other vital areas, such as community safety and policing.</p>	2.1 & 2.2, p.26-29	Actioned
	LBTH - Local Planning Authority	52	3 How have the ‘future potential sites’ been identified. This should be clarified in the document.	3.1 32-3	Actioned

No	Respondent	No	Comment	Section / page	Action
	LBTH - Local Planning Authority	53	<p>'Detailed work has been undertaken as part of the evidence base for this draft OAPF to try and establish the full extent of potential housing growth in the Isle of Dogs & South Poplar up to the period 2041. This has indicated that there could be capacity to deliver up to a total of 49k additional homes...' It isn't clear through this wording here that it includes some 19k permitted homes. '.... and so, to factor in flexibility, in terms of future growth potential and ensure that this document is able to respond accordingly to change, this capacity testing work has examined three different scenarios and examined the supporting infrastructure requirements for each'. This statement should link to the DIFS.</p> <p>'(such as estate regeneration schemes which would only come forward following full and transparent consultation with residents)'. We recommend referencing Mayor of London's guidance here.</p> <p>'Different policy compliant levels of affordable housing provision (35%, 40% and 50%) have been tested to ensure that affordable housing is deliverable within these figures. These demonstrate that a minimum figure of between 35% and 43% affordable housing should be deliverable in each of the scenarios'. It is considered that the '43%' could be removed from this statement to just leave the minimum 35% in accordance with local and regional planning policy. The 43% is not necessary and to be justified would require significant justification. 3.2 Housing 34-35 □ Key on figure 3.2 – why is family housing only highlighted in some areas? What is this supported by? LBTH consider that family housing should be provided in most developments.</p> <p>"This OAPF envisages growth primarily of mid-rise and tall buildings in the South Poplar, Canary Wharf, South Quay, Millwall and Cubit Town areas in line with current development trends". This statement is misleading because new development in these areas will primarily be high density.</p> <p>3.2 Housing 34-35 • See below comments in relation to building heights and figure 3.2: o Figure 3.2 identifies that there are "secondary tall building clusters", and although this reflects the outline of the Millwall Inner Dock, Blackwall and Leamouth tall building zones in the LBTH local plan policy D.DH6, the language used is not consistent with the Local Plan. As a result this may be confusing to readers. Nowhere in the local plan do we make reference to there being 'secondary' tall building zones and more clarity is needed on this. o As such, consider aligning the 'building clusters' on this spread with the tall building zones in the local plan. o In particular, the areas shown as the Blackwall, Leamouth and Millwall Inner Dock clusters do not seem to show the full extent of those tall building zones. o It is confusing to refer to the hatched area around One Canada Square as the "Canary Wharf tall building cluster" as the Canary Wharf tall building zone in the plan covers a wider area that adjoins the Millwall Inner Dock tall building zone. Maybe this could read Canary Wharf commercial core instead?</p> <p>o The 'step down approach' needs to be fully recognised in this section, with reference to the Local Plan and the Tall building Study (2018) o What is mid-rise in the context of the IoDSP – is it not tall? Also, what is the definition of tall? More distinction is needed between the super-tall buildings in the Canary Wharf cluster and the tall buildings elsewhere on the island. Overall, a definition should be provided for each of the typologies parts in the key for Figure 3.2. o Furthermore, a recognition that these clusters are indicatively drawn would be useful. Either that, or draw them more accurately as per the Local Plan. Although this is primarily a commentary on housing, the text should also add a view on infrastructure, for example: ...it is recognised that higher levels of infrastructure investment and delivery would be required if the high and maximum housing scenarios were to be further explored in terms of feasibility.</p> <p>Housing delivery clearly cannot be provided in isolation of infrastructure considerations.</p>	3.2, p34-39 Fig 3.2	Actioned

No	Respondent	No	Comment	Section / page	Action
	LBTH - Local Planning Authority	54	<p>Suggest changing the title of Figure 3.3 – it does not just illustrate the employment strategy but also the hierarchy and network of town centres. • There are also a number of smaller neighbourhood centres, including South Quay, City Island and Poplar High Street, which could be shown as neighbourhood centres as identified in the new Local Plan. It is currently difficult to identify the town centres hierarchy on this map. • District Centres/local employment hub – does this show the future centres as part of redevelopment proposals in these areas? If so this needs to be clear. • The text supporting the centres needs to acknowledge that 'genuine' town centres that properly serve the local community must be delivered as part of regeneration. This is particularly relevant for South Quay and Crossharbour where there is a risk that these centres might not be delivered to provide the right town centre/retail offer.</p> <p>With regards to the CAZ zones and Activity Areas, please cross check to the Local Plan polices map to ensure that they broadly align (acknowledging that the OAPF draws them indicatively). For example, there is also an Activity Area which extends to Poplar High Street in the north. • Note: CAZ 'Zone A' is Primary POL and CAZ 'Zone B' is Secondary POL in the context of the Local Plan. All CAZ zones and definitions should be clarified here or in the glossary – readers won't necessarily know what the CAZ is. • There are different coloured arrows on this map. They should be included in the key.</p> <p>A more fine grain analysis of the nature of office based employment would be useful – what about emerging sectors such as tech and what are the different spatial and infrastructure demands of these sectors.</p> <p>'There is a need to diversify the types of businesses located within the area'. Why is there a need for this? It should be clarified.</p> <p>• 'Given the constraints on development within the central CAZ...' What are the constraints on development? 'Central CAZ' – is this in reference 'Zone A'</p> <p>Northern Isle of Dogs needs to be clarified as it is not clear how this differentiates from Canary Wharf – either on the map or maybe in the glossary?</p> <p>Commentary on the job generation created by new infrastructure is not mentioned here and should be mentioned. Community hubs, for instance, will create new employment opportunities.</p>	3.3 Employment + centres 36-37	Actioned
	LBTH - Local Planning Authority	55	<p><input type="checkbox"/> The title of this section is misleading, given that the supporting text relates specifically to housing and employment and excludes the other components of good growth set out in section 2.2, such as sustainability, connectivity, community etc. (Although we appreciate these are covered in part 4).</p>	3.4 Implementing the components of good growth 38-39	Actioned
	LBTH - Local Planning Authority	56	<p><input type="checkbox"/> Housing: 'Minimum of 35% affordable housing to be delivered across all development sites, with the potential for more affordable housing beyond the baseline growth levels'. How will this be secured – through grant-funding or RP-led schemes?</p> <p><input type="checkbox"/> 'Development proposals must accommodate Local Plan compliant housing mixes, however it is noted that family housing may be more appropriate in certain building typologies'. We consider this to be unhelpful wording. The provision of tall buildings should not be able to be used as a way to avoid the provision of family housing (in particular family affordable housing). This links to 3.4.3 which emphasises on site delivery.</p> <p>3.4.4 – There are concerns with the following wording: "Developments should consider over provision of communal spaces distributed throughout the building in very high density typologies". While the Council supports the overprovision of communal spaces, it is not considered appropriate to promote their locations throughout the buildings, especially in areas of open space deficiency. Developments should aim to deliver high quality communal open spaces regardless of their densities.</p>	3.4 Implementing the components of good growth 38-39	None
	LBTH - Local Planning Authority	57	<p>core and wider activity area? In the Local Plan we have a Primary POL (zone A), Secondary POL (zone B) and then an activity area to the north and south of the POL.</p>	3.4.7	Actioned

No	Respondent	No	Comment	Section / page	Action
	LBTH - Local Planning Authority	58	3.4.9 – ‘new’ district centre at Crossharbour – what does this mean? Could more detail about the redevelopment be provided? <input type="checkbox"/> 3.4.10 – emerging production corridor? What is this - more detail needed. <input type="checkbox"/> ‘Maker-spaces’ need to be defined. (3.4.13). Analysis needs to be provided of the changing nature of the Isle of Dogs economy with an understanding expressed of the new types of spaces that these providers will require in fin-tech, tech, other SME sectors, as well as what their colocation and infrastructure requirements will be. <input type="checkbox"/> Is ‘Activity Zone’ meaning ‘Activity Area’? <input type="checkbox"/> 3.4.14 – it is not clear regarding the market uses – the council would be cautious in terms of new markets outside (and sometimes inside) town centres if they detract from the role of our town centres. It might be worth just keeping to ‘meanwhile’ opportunities if that is the point being made. <input type="checkbox"/> Recommendations – can it be clarified who these recommendations are for where applicable? Also, can more detail be provided in some instances – i.e. ‘recommend exploring opportunities’ – what opportunities are these?	3.4	Actioned
	LBTH - Local Planning Authority	59	We feel there is scope to align the framework more closely with the emerging policies set out in the new London Plan, in particular: <ul style="list-style-type: none"> o the linkages between the opportunity area and areas of regeneration (in particular, looking at the potential opportunities arising from development and investment to tackle the specific causes of deprivation that impact on the lives of people who live there, and how it will contribute to the renewal and regeneration of the area, including town centres, as set out in policies SD1 and SD10); and Do you agree with diversifying the employment offer of Canary Wharf? o the linkages between the opportunity area and strategic growth corridors, building on the opportunities identified in part 1.1 of the framework. <input type="checkbox"/> As mentioned above, one of the challenges of high density living would be the delivery of high quality open spaces. The majority of the Isle of Dogs and South Poplar are classified as areas of open space deficiency in the Tower Hamlets Open Space Strategy (2017) and the OAPF should widely promote the delivery of new high quality open spaces. 	consultation question - opps for growth?	Actioned
	LBTH - Local Planning Authority	60	In the first paragraph of this spread when it refers to the ‘supporting infrastructure study’ should the DIFS be referenced? <input type="checkbox"/> It also needs to be acknowledged up front that the infrastructure provision for the ‘target scenario’ is already being planned for by LBTH through the IDP. Under “green infrastructure”, an additional requirement should be added along the lines of: “No loss of waterspace and greenspace”. This is consistent with the Local Plan and the findings of the Water Space Study and Open Space Strategy. <p>The section (Who delivers?) is a welcome addition to the OAPF. It is focussed on the key agencies but others could be referenced to reflect the multi-disciplinary nature of infrastructure delivery, for example:</p> <p>Green infrastructure: “LBTH, developers, government agencies & voluntary organisations”</p> <p>Community, leisure & sport: “LBTH & voluntary organisations”</p> <p>Schools: “Education and Skill Funding Agency (ESFA), LBTH & private providers</p> <p>Also, where LBTH is referenced, it would be helpful to state which council service is responsible. LBTH TO CONFIRM</p> <p>Outdoor playing pitch provision should also be listed alongside sport halls, in view of the shortfall.</p>	Part 4, p.42-43	Actioned
	LBTH - Local Planning Authority	61	<input type="checkbox"/> ‘Now, further investment and the right policies are needed to support ‘good growth’ We support this, but what are these policies? Maybe link back to new London Plan and the MTS?	4.1.1 Transport and movement strategy	Actioned

No	Respondent	No	Comment	Section / page	Action
	LBTH - Local Planning Authority	62	<p>4.2 Social and community infrastructure</p> <p>50 • Again, the DIFS should be explicitly referenced. The DIFs also includes costs.</p> <p>50-57 • It is still unclear whether service providers have been engaged (beyond the Council) – especially for the emergency services and health. Their input is required to consider deliverability.</p> <p>50-51 • Figure 4.2 (Co-location of social infrastructure at community hubs in the Isle of Dogs and South Poplar) is still not fully explained through the text. This should be expanded if possible and should ideally include type and uses of existing and proposed</p> <p>50-51 • 4.2.1 – it should be made clearer that the Tower Hamlets Local Plan and IDP assume a primary school to deliver 2 FE as opposed to 3FE in the OAPF. Ideally, we should be planning for the same size schools for the purpose of consistency.</p> <p>50-57 • Note: IDP should be written out in full: Tower Hamlets Infrastructure Delivery Plan (see section 4.2.1).</p> <p>52-53 • This section currently shows a 'gap' in schools that don't meet the Local Plan baseline. This should be clarified in this section, such as linking in to bolded text that these projections run to 2041? • Furthermore, it is worth mentioning that other secondary schools will be delivered just outside but in close proximity to the IoDSP (I.e. Levin Road Site Allocation) which is within a suitable catchment.</p> <p>52-53 • 4.2.1 - Recommended options: the expansion of existing schools and creation of all through schools. • For further information and context on this issue, see below some observations from officers:</p> <ul style="list-style-type: none"> o There may be scope to expand some of the schools on the island (for example, Cubitt Town and Seven Mills). Some initial feasibility work was done on this in 2015. George Green's may also have scope to expand if pupils were decanted onto another site and the school was rebuilt. It's currently undergoing expansion to provide more sixth form places. o We understand the point being made regarding allthrough schools because in theory it can be more economical with space that way. However, note that the school sites in the Local Plan only allocate for primary OR secondary schools. Westferry would be the only site in the OA that could potentially accommodate and all-through and we doubt it has been feasibility tested for that. o Regarding 'Tower Hamlets land', what about opportunities on GLA/TfL land? Is it better to say public sector land because LBTH have very little land in the area. <p>52-53 • Some examples of 'innovative design solutions' would be beneficial.</p> <p>52-53 • The methodology section in 4.2.1 does not adequately describe the methodology used to produce these figures. It should clearly explain that the estimated number of units were entered into the GLA child yield calculator which includes data from other boroughs, not just Tower Hamlets. • 4.2.1 states that the Local Plan is 'based on school roll projections'. It would be more accurate to say that 'bespoke school roll projections provided by the GLA's school roll projection service serve, as an evidence base for the Local Plan. These projections use a different methodology than is used here and includes factors such as trends in births, migration, pupils flows, and actual school roll data.'</p> <p>The 'requirements' table in 4.2.1 is overstating the number of primary schools needed. If they are assuming a 3FE primary school as stated, this should be: Primary Baseline growth 26FE = 9 schools (not 10) High growth 32FE = 11 schools (not 12) Max growth 38FE = 13 schools (not 14)</p> <ul style="list-style-type: none"> • The infographic on page 43 should be updated accordingly so that it says a minimum of 9 primary schools are needed. <p>56-57 • 4.2.3 – the greater use of water spaces is supported. Clarification should be provided whether the quality of water has been taken into considerations when proposing potential open water swimming in the Millwall Inner Dock.</p> <p>50-57 • As mentioned previously within this comment schedule, this section could also aim to address the current deficiency and projected demand for open space.</p> <p>50-51 • The community hub demarcation in Figure 4.2 (in the vicinity of Manchester Road) appears a little over exaggerated in length and might need refining. Also, a definition of what is meant by 'community hub' would be useful at this point.</p> <ul style="list-style-type: none"> • The definition of social infrastructure is useful here but it has been referred to several times in the document already without description of what it is or what it includes. (See comment in section 1.1). <p>54 • The methodology in 4.2.1 states that the Local Plan runs to 2025 and it should say that it is up to 2031.</p> <p>54-55 • Note: Westferry Printworks should be included within 4.2.2 – GP Surgeries with planning permission.</p> <p>54-55 • Does the reference to GP's include wider uses for health facilities as the Local Plan has taken a broader approach and includes wider range of health facilities beyond GP's. • If these facilities have been included then it needs to be made clearer.</p> <p>56-57 • Note: The IDP Evidence Base shows deficit levels in terms of swimming pools. This might be a helpful reference point for this section. It should be noted that there is a plan for a swimming pool at East India Dock (near the Council offices) also. This has planning permission. • In addition, the Local Plan Site Allocation for Westferry Printworks has an Infrastructure Requirement of Leisure Centre (re-provision) which refers to Tiller Leisure Centre (including swimming pool at 5x lane, 25m)</p>	4.2, p.50-58	Actioned

No	Respondent	No	Comment	Section / page	Action
	LBTH - Local Planning Authority	63	<p>4.3 Sustainability and utilities strategy</p> <p>58-63 <input type="checkbox"/> It is acknowledged that this section has improved and many of the concerns have been addressed.</p> <p>58 <input type="checkbox"/> It is suggested that at the start of section 4.3, near the top of the second column of page 58, where it says "Enhancing access to, biodiversity and resilience of Mudchute Park as a Site of Metropolitan Importance for Nature Conservation", replace "Site of Metropolitan Importance for Nature Conservation" with "Local Nature Reserve", as the latter is the designation that reflects land use.</p> <p>58 <input type="checkbox"/> 'Improvements to access and robustness of Millwall Park and Sir John McDougal Park'. What does robustness actually mean in this context?</p> <p>58-63 <input type="checkbox"/> While the wording around open space, biodiversity and green infrastructure is generally sufficient, the document is very short on specifics of how this will actually be achieved alongside the level of population growth proposed. This should be acknowledged in the document.</p> <p>58-63 <input type="checkbox"/> We feel there is an opportunity to be even more innovative and ground-breaking in this section. For example, the concept of urban forestry ("greening the skyline") could be further explored and embedded into the masterplanning of the key development sites within the OA. <input type="checkbox"/> Given the scarcity of land and breathing spaces, the OAPF has the potential to offer up a refreshing vision of how the skyline of the Isle of Dogs might look in the future as a green landscape. This should be reflected in the supporting text.</p> <p>58-63 <input type="checkbox"/> In relation to the delivery of green infrastructure, development could also give consideration to: <input type="checkbox"/> communal sky gardens; <input type="checkbox"/> garden terraces; <input type="checkbox"/> wildflower meadows; <input type="checkbox"/> plant and tree-lined balconies; <input type="checkbox"/> living bridges; and <input type="checkbox"/> green walls / facades</p> <p>60-61 <input type="checkbox"/> This section appears to have been improved in relation to water quality and leisure value of the docks. However, this could be further improved given that green space is still used as an overarching term which could lead to confusion. <input type="checkbox"/> Consideration should be given to the inclusion of the term 'blue space' or similar to provide greater clarity.</p> <p>There is a typo on page 61 bullet point 6, first sentence 'A detailed study (IWMS) is required in to the overall impact...'. <input type="checkbox"/> Unsure of the wording in the second sentence of the same bullet point - this shouldn't just be an interim measure.</p> <p>58-63 Overall comments on 'zero carbon city' proposals The overarching principles and objectives identified are supported for: <input type="checkbox"/> Ensuring all development reduces exposure to air pollutants and noise, contributes to London as a zero carbon, zero waste city, improves resilience to climate change impacts and enhances existing green infrastructure.</p> <p>Renewable energy to support London becoming a zero carbon city by 2050</p> <p>The proposals to produce a 'utilities and sustainability strategy' are also supported to ensure a coordinated approach to utilities, renewable energy and sustainable construction across all sites to minimise disruption to the wider community. <input type="checkbox"/> However, while the broad principle of becoming a zero carbon city is supported, the document is very short on specifics of how this will actually be achieved given the significant energy use requirements through construction and operation of the proposals.</p> <p>The document identifies in section 4.3 that an 'Energy Master Plan (EMP) should be carried out.' This is supported and timing will be critical to ensure that as many developments are captured in the EMP and committed to developing and delivering a coordinated approach. An 'Energy and Utilities Steering Group' is also proposed to be set and this should also be done at the earliest opportunity to ensure meaningful conclusions and recommendations and integrated into the OAPF.</p> <p>Section 4.3 includes a map showing proposed district heating network, but does not include the current existing Barkantine Heat network. The document should make it explicit that improvements to and extending existing district heating systems should be prioritised. This will benefit those currently linked to the network through reducing carbon intensity of the network.</p>	4.3, p58-63	Actioned

No	Respondent	No	Comment	Section / page	Action
	LBTH - Local Planning Authority	64	<p>58-63 Overall comments on air quality • Although it is referenced, air quality is a significant issue for OA. Please consider comments below through the LBTH air quality officer: • The major through routes near the OA include: o A13 – East India Dock Rd o A1261 – Aspern Way o A102 – Blackwall Tunnel Northern Approach • All are highly polluted (please refer to the GLA/TfL Air pollution forecast map for more information). • We could support this by referencing the GLA Air Quality Focus Areas, one of which is in the OAPF area. • We note that air quality is specifically referenced in the Integrated Impact Assessment. It seems to be focused on delivery of better air quality through encouraging sustainable and active travel. Given the levels of air pollution are highest on major through routes within the area, this is unlikely to have a significant impact on these areas. The OAPF should consider this and as it is a development plan it should specifically reference putting new sensitive land uses – housing & schools in particular away from the most polluted major road corridors. In addition these road corridors will be impacted by high noise levels as well. • Specific encouragement for the provision of less polluting forms of transport in addition to active travel could include:</p> <p>o Provision of electric vehicle charging o Allocation of parking spaces for zero emission vehicle car clubs • Note: If there is anything that can be addressed/referenced in the OAPF to discourage through traffic, it would be a bonus.</p> <p>64-65 • We welcome the ambitious target (90%) of achieving a significant increase in sustainable travel. This is in excess of the London target (80%) and effectively means an almost car-free environment.</p> <p>64-65 • Paragraph 4.4.7 does not make sense – could refer to green enhancements</p> <p>64-65 • Paragraph 4.4.20 - what type of 'technology' is referred to? This is too open ended.</p> <p>64-65 • 4.4.27 – 'Spaces could also be used as temporary schools, should capacity be required'. We are not anticipating temporary schools and we are unsure how this would work. Detailed planning is already taking place to ensure sufficient school provision to support growth so we question the need for temporary schools.</p> <p>64-65 • 4.4.28 – What is the point that is being made here – that public spaces/buildings should be used flexibly for the benefit of the local community? This needs to be a bit clearer. • 4.4.29 – How is this specific to IoDSP? Has the island seen closures?</p> <p>64-65 • This section should place greater focus on the protection of existing waterspace and open greenspace. Please also consider adding text: 'No loss of waterspace and greenspace'.</p> <p>64-65 • 'Increase in 20% green cover' should be reworded to say: "20% increase in green cover" o More clarity is needed on this point. What does it mean? Is this target realistic and can be delivered? What is the current baseline? Please note: This is well below the Mayor of London's commitment to extend London's green cover to 50%. o Does the target relate to buildings (including internal communal areas) as well as spaces and, if so, how will it be measured? How much of this target will be new publically accessible greenspace? o Canary Wharf and the north of the Isle of Dogs possesses very little accessible greenspace (see section 1.5) and much of it is pseudo-private. The lack of 'publically accessible' open space should be acknowledged in the supporting text. The plan could also include a separate target to increase the proportion of publically accessible greenspace, and there could be a requirement that all new open space must be publically accessible.</p> <p>64-65 • This section should also include some text regarding waste management.</p> <p>Consultation questions Have we identified all</p> <p>• The OAPF should also consider (even if it's only high level consideration) the following types of social infrastructure: o Special schools – if the OAPF figure for schools does not the types of infrastructure needed to support growth?</p>	p58-65	Actioned

No	Respondent	No	Comment	Section / page	Action
	LBTH - Local Planning Authority	64	<p>What community infrastructure would you like to see in the Isle of Dogs and South Poplar and where?</p> <p>include special schools/alternative provision then it should. Although numbers are hard to predict we have some figures for the next 5 years which show a need for special schools.</p> <ul style="list-style-type: none"> o Nursery and child care provision – council members have raised concerns about the lack of affordable early education and child care provision1. The demand for early education and care facilities in the area continues to grow in response to the rising birth rate. (This issue is partly covered in Local Plan policy D.EMP2 which seeks to provide new child care provision within new employment space). o The provision of early year facilities will contribute towards reducing the borough’s current below-average levels of achieving good cognitive development at age 5 and enable greater employment rates amongst parents in line with our statutory duty to provide childcare to some 2year-olds and all 3-and-4-year-olds. • As stated previously, the OAPF does not take into consideration the current deficiency and projected demand for open space. In order to support growth, it is important to take open spaces into consideration given various other limitations and constraints that exist. While this has been partially addressed through Part five Public realm and Urban Design, it is important to acknowledge that open space is a part of social and community infrastructure that has been planned for. 		
	LBTH - Local Planning Authority	65	<p>Chapter 5: Public realm + urban design</p> <p>68-102 <input type="checkbox"/> Overall, we consider chapter 5 to be strong and the close working between GLA and LBTH officers has helped strengthen the document. However, as an overall comment it is considered that there is still an opportunity be even more ambitious, innovative and forward-thinking in order to reflect the role and pre-eminence of the area as one the UK’s main employment and creative hubs and a globally important financial centre. This would in turn reflect the Mayor of London’s ambitious agenda set out in the Environment Plan, Smart Plan and new London Plan, including:</p> <ul style="list-style-type: none"> o exploring the opportunities to become a national and international exemplar of low carbon economy, which will help realise the Mayor’s ambition to make London a zerocarbon city (examples of potential initiatives include: the designation of a low emission zone; the expansion of the heat and power network to power all of the homes and businesses in the area; and a requirement that all new buildings are carbon neutral or net positive2); o expanding the concept of the “tech and smart city” (see section 6.1 of the OAPF), having regard to the Mayor of London’s Smart London Plan and local initiatives (e.g. Level 39 in Canary Wharf) to inform the future growth of the area (examples of potential initiatives include: the installation of fibre-optic connectivity at key nodal points, such as Crossrail and DLR stations; zero emission taxi fleets; expansion of electric-charging points); o facilitating a more positive approach to the greening of the urban environment, including the use of innovative techniques, such as vertical greenery and streets in the sky; o placing more focus on promoting the unique qualities of the area to create a more attractive, distinctive and cohesive place, where people want to live, work and enjoy leisure (based on a detailed urban character analysis of the area); and o working with architects and designers to create exemplar and iconic tall buildings of global significance (see Royal Park OAPF, Vauxhall Nine Elms Battersea OAPF and London Riverside). <p>NB: the Canary Wharf Group’s new sustainability strategy sets out a target of making its developments net zero carbon or net positive by 2030.</p>	chapter 5	Actioned
	LBTH - Local Planning Authority	66	<p>68-102 <input type="checkbox"/> As mentioned previously, the OAPF should define what is meant by ‘low, medium and high’ in terms of heights/storeys. I.e. what is medium rise in the OA area could have a very different definition to elsewhere in the borough.</p> <p>68-69 <input type="checkbox"/> Do you mean complement? From an urban design perspective, it would be more appropriate to say “take account” or “have regard to” rather than “complement” (section 5.1). <input type="checkbox"/> The scale of growth within the areas of change (notably, South Poplar, South Quay and Crossharbour town centre) will clearly have a significant impact on the character of the surrounding area (e.g. the predominantly low rise urban grain of Poplar means it is going to be very difficult to achieve a ‘complementary’ form of development in the wider area). We therefore suggest inserting something along the lines of: “Development within the areas of change should respond sensitively to surrounding context and be well-integrated into the immediate area”.</p>	5.1, p.68-69	Actioned

No	Respondent	No	Comment	Section / page	Action
	LBTH - Local Planning Authority	67	<p>□ The comment in relation to squares and public realm has seemingly not been addressed, as 5.4 still provides references to public squares, with no definition. This implies the area will be hard landscaping and it is unclear why soft landscaping cannot be provided within this. □ Overall, the OAPF should look to draw a distinction between open green space and hard civic spaces. □ Furthermore, new development should also provide a clear delineation between public, private and semi-private spaces. □ The typo has been addressed, however it is still not known what is meant by the 'Fashioning Poplar'. □ Again we question the 'urban village' for South Poplar. □ Why should Poplar High Street be a destination? For who? Why not a useful local shopping street? i.e. fulfil the function of a district centre. □ It's also potentially contradictory for it to be both a village and a destination high street.</p> <p>Figure 5.3 – Hercules Wharf is no longer a site allocation</p> <p>5.4 Areas of change 87-113 □ Note: The areas of change are often already areas currently in transformation or with already established plans for development. This should be recognised.</p>	5.4 Areas of change 87-113	Actioned
	LBTH - Local Planning Authority	68	<p>□ General comments on the illustrative masterplan in the section include:</p> <ul style="list-style-type: none"> o Illustrative masterplans for areas of change could show existing block structure of urban fabric, plots with planning permission, under construction and which are opportunities for future growth. o Illustrative masterplans for areas of change show elements which are undeliverable or against existing planning permission in the plan such as park on the Reuter's site or park in place of the existing office building by the Millwall Outer Dock, extent of park by Cuba Street. Also layout of Crossharbour District Centre is copied from a lapsed planning permission, which seems to be unnecessary commitment. o Illustrative masterplans for areas of change contain factual errors such as: public realm around Baltimore Tower marked as a park, extent of Outer Dock Park overlaps existing office building. 	5.4 Areas of change 87-113	Actioned
	LBTH - Local Planning Authority	69	<p>Blackwall □ Creating a supporting 'community hub' at East India. Is this a typo – shouldn't this be either creating or supporting? But either way – what is this hub? □ 'Skateboarding in the new square'. Seems like a strange suggestion – and how would this implemented? Through a skate park or through incidental play? □ Due to the fragmented and disconnected nature of the area, the vision should also make it clear that this new community will be well-integrated with surrounding neighbourhoods, providing a strong sense of arrival and transition to the waterfront. □ If the area is to become a designation in its own right, greater emphasis needs to be placed on the potential opportunities to enhance the quality and quantity of green infrastructure in this area, building on its waterfront setting. Blackwall lacks greenery and access to public open space. □ Delivering a new typology – does this apply to the docklands as a whole? Is it a new typology, or is it building on existing typologies? What is the rationale behind this? □ The masterplan diagram only appears to cover a section of the Blackwall 'area of change' identified on figure 5.3 and includes most of the remaining portion of the character area (Leamouth). □ Insert the name of the DLR station (East India) on the illustrative masterplan.</p>	5.4 Areas of change BLACKWAL	Actioned
	LBTH - Local Planning Authority	70	<p>□ CAZ "A" and CAZ "B" – these definitions need to be explained. □ The proposed greenspace (South Poplar Park) should be identified on the key (green and yellow cross hatching) □ Is there an opportunity to be more ambitious in the design concepts of 'delivering links across Aspen Way', linking to the overall vision for the area? For example, the opportunity to create a state-of-the-art green boulevard across Aspen Way through a series of interlinking bridges, tree-lined avenues and segregated cycle lanes. □ Mention to the landing location for the Rotherhithe-CW river crossing is needed.</p>	5.4.2 93-95 South Poplar	Actioned
	LBTH - Local Planning Authority	71	<p>□ The Rotherhithe to Canary Wharf River Crossing – as one of the key pieces of infrastructure in the area, its role in enhancing links across the river from Rotherhithe (including Canary Water and Surrey Quays) to Canary Wharf should be acknowledged in the vision.</p>	5.4.3 97-98 Canary Riverside	None

No	Respondent	No	Comment	Section / page	Action
	LBTH - Local Planning Authority	72	<p><input type="checkbox"/> The quality of the dock spaces and public realm must be intensified – intensified or improved? <input type="checkbox"/> We welcome the vision’s punchy strapline: “modern living by the water”. However, it should be articulated more clearly what this vision will look like, as per the other “opportunities” sub-sections. <input type="checkbox"/> With its multiple landownerships and individual parcels of land, the OAPF provides the opportunity to ensure that new development works harder to create a distinctive and stronger sense of place. We suggest adding something along the lines of: “South Quay will become a thriving dockside urban neighbourhood, with strong functional links to Canary Wharf and other parts of the Isle of Dogs, incorporating a more diverse range of new community facilities and services and useable and accessible open spaces along the waterfront” <input type="checkbox"/> South Quay illustrative masterplan – the key is missing. <input type="checkbox"/> Forming an integral element of the tall building zone, South Quay would benefit from guidance to inform the built form and massing of tall buildings in this area, including the stepped down approach set out in the Local Plan section and the relationship between tall buildings and the surrounding street scene.</p> <p><input type="checkbox"/> 5.4.4 – there is a lot of reference to high density. Although it’s within a tall building zone, I think development management are more inclined to refer to optimising the site rather than saying high density.</p>	5.4.4 p.101-103 South Quay	Actioned
	LBTH - Local Planning Authority	73	<p>We welcome the strapline: “between blue and green - living close to nature”. Do you mean blue and green ‘spaces’? <input type="checkbox"/> “Millwall will become a leisure and recreation destination where the community can enjoy a range of outdoor leisure activities on the water, dock edge and within new and improved parks”. Do you mean Millwall Waterfront? Also, do you mean a predominantly leisure and recreational designation? The area will also be home to high density housing and other significant uses, as indicated in this section (5.4.5).</p>	5.4.5 p.104-107 Millwall Waterfront	Actioned
	LBTH - Local Planning Authority	74	<p>principles – point 9: Opportunity to increase school capacity or provide a secondary school. Has this been discussed with the education team? <input type="checkbox"/> It needs to be acknowledged in this section that the Crossharbour area of change is not part of a tall building cluster in the emerging local plan. As a result, building heights in this area must be managed sensitively in order to address the local plan height policy and to ensure that the delivery of a new district centre is not compromised.</p>	5.4.6 p.108-111 Crossharbour	None
	LBTH - Local Planning Authority	75	<p><input type="checkbox"/> 5.5.8 – Building heights strategy: We suggest that reference could be made here to taking into account the principles of the Tower Hamlets Tall Buildings Study (2018).</p> <p><input type="checkbox"/> Figure 5.4 – the key is slightly confusing as there are various colours on the map that are not reflected in the key.</p> <p><input type="checkbox"/> Pre-app should read: “pre-application”.</p> <p><input type="checkbox"/> Working groups will be encouraged to submit a growth area masterplan as part of a planning application; this masterplan should be developed through a combined LBTH, GLA and TfL pre-app process. How will this combined process work in practice?</p> <p><input type="checkbox"/> The OAPF could benefit from defining the key growth areas for joint cooperation in spatial terms.</p>	5.5 p.112-113	Actioned

No	Respondent	No	Comment	Section / page	Action
	LBTH - Local Planning Authority	76	<p>1. Blackwall: a. The map (any map) does not cover a new Poplar High Street neighbourhood centre in Blackwall which is an area of substantial change. The map should demonstrate connections of the centre with pan local routes and adjacent areas. b. Mark on the map a connection from the Thames Walk to Canning Town station through City Island and the new bridge c. Blackwall Yard is a development site which should be reflected in the text. A new green space should be a part of redevelopment of this site. Connection from the Poplar High Street neighbourhood centre should be marked. d. Bow Creek River Walk: confusing name for the public open space, especially if there is a Leaway running along it. e. Orchard Wharf seems to be marked on the map as an existing building frontage, which is wrong.</p> <p>2. South Poplar a. Upper Bank Street marked on the map as Bank Street. b. Include improvements to the public realm around Westferry DLR station including reconfiguration of the NW staircase which currently severely constraints public realm in the area. c. Improve pedestrian connection and legibility between Westferry DLR and the river Thames.</p> <p>3. Canary Wharf a. Lack of north-south connections they should be shown on the map: with South Poplar, Preston Road, Poplar Dock. 4. South Quay a. Limeharbour Park is marked in the area currently occupied by Baltimore Tower with associated public realm. Delivery of the park in this location is unrealistic. b. North – south connections through the area should be indicated in order to maintain the presence of South Quay in the street scene of Marsh Wall at least. Eg. Connections from South Quay footbridges should be aligned with relevant streets perpendicular to Marsh Wall. c. Connections to the Thames Path in the western side of the area should be indicated / established. d. Cuba Street public open space should be indicated on multiple sites in order to ensure its deliverability and size appropriate for the area with one of the highest residential density in the world in the context of general deficiency in provision of public open space. 5. Millwall waterfront a. Outer Dock Park is indicated over the existing buildings. 6. Crossharbour a. Urban blocks demonstrated on the plan are taken from lapsed application which will be replaced with something else. The masterplan should indicate principles for building lines and connections only. b. Connection through Pepper street should be indicated as well as improvements to the junction by the Crossharbour station as part of efforts to create a cohesive district centre.</p>	Graphics	Actioned
	LBTH - Local Planning Authority	77	<p>Paragraph 2, last sentence starting “Given”. This implies that funding gap to be solved by high land values which suggests CIL rather than the full range of funding options listed later in the chapter. Propose reworded to something along the lines of: “Section 6.2 sets out multiple options to be explored further for funding the gap and with the right processes in place.....”</p> <p><input type="checkbox"/> Page 120 – ‘Ongoing development management’ text box: <input type="checkbox"/> The implementation of housing management plans should be acknowledged. There is concern about how this could be delivered and whether it would meet the NPPF conditions to be a condition / validation requirement. It would be useful to understand how the GLA considers this could be delivered. <input type="checkbox"/> More guidance on this issue would be appreciated in order to ensure that it does not raise expectations where the planning system cannot be conditioned or enforced.</p> <p><input type="checkbox"/> Recommendation 3, first para. Remove the word “accelerate”.</p> <p>6.2 Phasing and funding of development 124 <input type="checkbox"/> Para 2 on Page 124, sentence starting “Given”. Reword as “Given the high values in the area and multiple potential funding options set out in this section, we recommend.....”</p>	6.1 The delivery plan 120	Actioned
	LBTH - Local Planning Authority	78	<p><input type="checkbox"/> Change to ‘2018 draft local plan’ <input type="checkbox"/> Disagree that the timing of the Local Plan and Neighbourhood Plan allow us to consult jointly <input type="checkbox"/> Note – take account of update to the IoD Neighbourhood Plan <input type="checkbox"/> ‘A list of proposed focus groups with key stakeholders based around key themes will be advertised online’. Did this happen?</p>	7.1 Statement of consultation 131 - 133	Actioned

No	Respondent	No	Comment	Section / page	Action
	LBTH - Local Planning Authority	79	<p>DELIVERY PLAN _ detailed recommendations and a structure for delivery. This and other models need to be considered objectively and the best fit for the area formulated. The Delivery section should acknowledge that these options exist and that it is for LBTH and its delivery partners to decide which is most suitable to this unique task. <input type="checkbox"/> London Borough of Tower Hamlets is committed to managing development on the Isle of Dogs and improving the life of its residents. Growth on the island is of regional and national importance and addressing current and future infrastructure challenges that it faces, is also a strategic matter of local, regional and national importance. With that in mind the challenge ahead, to manage the complex challenge this area brings needs to be tackled through a committed partnership between LBTH, GLA, TfL and Government. <input type="checkbox"/> With this in mind, it is erroneous and misleading to state the responsibilities for the delivery must all fall with LBTH. LBTH can and will lead, but needs to full commitment and investment of these partners for this work to succeed and succeed at pace. <input type="checkbox"/> Request that the GLA share the summary of consultation responses with LBTH and TfL at the earliest stage possible and this need to be considered as part of the roll out of the Delivery of the OAPF.</p> <p>Challenges/risk to overcome as partners <input type="checkbox"/> Organisational structures and bureaucracy may slow decision making, procurement, spending and appointments – need to explore ability to utilise working practices of partnership bodies to avoid unnecessary delays. <input type="checkbox"/> Clarifying partnership arrangements – LBTH should not and will not be the sole body funding the Delivery Board, Delivery Team and infrastructure roll out. Costs of managing this over 25 years likely to be in the tens of millions, notwithstanding the £1.6billion plus infrastructure to manage. GLA, TfL and Government need to be committed partners if this is to succeed. Agreeing the precise nature of funding and governance partnership likely to take some time. Important that LBTH, GLA and TfL take the lead and share burden at the outset, with an agreement on how contributions are shared at a later stage. <input type="checkbox"/> To succeed the roll out needs to be informed by best practice models of delivery from London and beyond the capital. LBTH will need to rely on the support of partner bodies to access information on Delivery Plans, Structures, Funding Packages that is currently restricted from public view. Need the commitment of partners to share information in a timely manner.</p> <p>Next steps for LBTH and partners <input type="checkbox"/> Officers to agree a series of meetings in the next 4 weeks to: - initiate and prepare initial project plan/programme and Business Case for decision makers - exploring options and comparable models - gather details on costs and realistic timing - identify areas for urgent decisions i.e. priority work - identify areas for quick wins, further work and consideration <input type="checkbox"/> Meeting between Mayor Biggs, GLA, TfL, Homes England and HCLG to discuss roll out, partnership working and funding asap. <input type="checkbox"/> Officer report to London Assembly and LGA to inform them of challenges and request support. <input type="checkbox"/> LBTH aims to establish priorities for action and begin roll out October 2018 Establish a forum for engaging with wider public to ensure transparency.</p>	DELIVERY PLAN	None
6	Environment Agency	80	<p>Northumberland Wharf, a safeguarded wharf, is within OA boundary. There are regulated waste activities on the wharf (Environmental Permits 80133 and 104101) which are a household recycling centre and a waste transfer centre, serving the existing communities in Tower Hamlets. The waste transfer station handled approximately 3,000 tonnes of waste last year and the household waste recycling centre handled 150,000 tonnes of waste last year. The waste is transferred from Northumberland Wharf to the Cory Riverside facility at Belvedere. reasonable to assume that the operation will continue to operate for the foreseeable future. With the projected increase in homes, population and development, likely that the waste generated will increase and facilities will need to need to increase capacity to manage demand. There may also be amenity issues associated with the operation of the facilities - high density residential development may not be appropriate in close proximity to a waste transfer site.</p>	p61 & 5.4.1	Actioned
	Environment Agency	81	<p>Policy SI1 of the draft London Plan promotes that development at an Opportunity Area scale should provide methods to achieve an air quality positive standard. In order to demonstrate that this will be achieved it will be important to understand the baseline air quality conditions today. We therefore recommend that you and LB Tower Hamlets carry out a baseline assessment to inform the air quality positive methodology and to ensure that these standards will be achieved at the Isle of Dogs and South Poplar. Due to the historic uses of the area it is highly likely that the land is impacted by contamination.</p>	Air Quality	Actioned
	Environment Agency	82	<p>The scale of redevelopment proposed for the area presents an opportunity to remediate land and improve water quality. Given the strategic scale of the planned redevelopment there is an opportunity for a strategic approach to land remediation. A joined up approach to land remediation, and where appropriate the reuse of materials, would have many benefits from an environmental sustainability perspective and could help to speed up delivery of development.</p>	general comment	Actioned

No	Respondent	No	Comment	Section / page	Action
	Environment Agency	83	<p>The Government's Environment Plan, (A Green Future: Our 25 Year Plan to Improve the Environment), January 2018 sets out the Government's aims to improve the environment, within a generation. It sets an aspiration for projects and plans to achieve environmental net-gain following a natural capital accounting approach. This aspiration is shared by the Mayor and is included in the draft London Plan and published London Environment Strategy. We would like to work with your organisation to develop a strategy of how this can be achieved at the Opportunity Area scale of the Isle of Dogs and South Poplar. This could be included within the scope of the proposed Greening Strategy but there will be clearly be overlap with other studies which you propose to carry out.</p> <p>The higher the density of development and the higher the number of homes, the more strain will be put on the environment, environmental infrastructure and assets. It is therefore important that whichever scenario is pursued also adequately plans for the environmental requirements of the current and future population living and working in the area. Each scenario will require the provision of well-planned, well-connected and multi-functional green infrastructure and this requirement is likely to increase relative to the number of homes planned for the area. It will also become more important for the new development to score highly when assessed against the Mayors 'urban greening factor'.</p>	Part 4	None
	Environment Agency	84	<p>Consultation Question To achieve the objective of good growth we should be collaboratively, pro-actively planning for the environment to ensure that the Isle of Dogs and South Poplar is resilient and can adapt to climate change, specifically the increased flood risk in future. Good growth will achieve net-environmental gain and create a better place for people that live and work in this part of London and for wildlife. 3. The proposed development of the Isle of Dogs and South Poplar presents an opportunity to adopt a riverside strategy to ensure that future changes to the riverside take place in a planned and integrated way which maximise the potential environmental, social, cultural and economic benefits. This will ensure that the area should continue to benefit from the world class standard of flood protection it enjoys today and enable economic growth to continue being generated in Canary Wharf and throughout the Isle of Dogs and South Poplar.</p> <p>To achieve good growth it will be important to adopt a natural capital accounting approach and to set a strategic direction for how environmental net-gain will be achieved.</p> <p>What are the benefits and challenges of high density living? provision of well-planned, well-connected and multi-functional green infrastructure and this requirement is likely to increase relative to the number of homes planned for the area</p> <p>Have we identified all the types of infrastructure needed to support growth? We think that further and more detailed assessment is required for the relevant green infrastructure and all infrastructure that fulfils environmental or eco-system services. We think that further work is required to assess the need for strategic SuDS, Flood risk management infrastructure and waste management infrastructure. The Integrated Water Management Strategy proposed within the OAPF will make recommendations for necessary water management infrastructure interventions and should inform any future infrastructure assessments and strategies. We would be happy to work with you and LB Tower Hamlets on assessing these requirements to support good growth.</p> <p>We believe that the diagram in section 4 could be misleading as it implies that flood defences will be provided by the Environment Agency. This is not necessarily the case and it is likely that any upgrade in flood defences in this area to accommodate future growth would have to be delivered in partnership between us and others. We also do not necessarily agree that flood defences should be considered in the same way as traditional utilities in the proposed strategy but we are pleased that they are considered in the same conversation and we look forward to working closely with you and others further in this area.</p>	part 4	None
7	Canal & Rivers Trust	85	<p>Development within the Isle of Dogs and South Poplar presents a unique opportunity to create vibrant docklands and cohesive and sustainable communities based on environmental, economic, social, physical and mental well-being. We believe the current, somewhat sterile docks have real potential to become animated and enlivened locations, supporting the growth in the OAPF area.</p>	general comment	None
	Canal & Rivers Trust	86	<p>It is important that the framework considers not only the docksides, but also the function of the water space within the docks. The Trust is supportive of public realm improvements proposed for the dock edges, but consideration should also be made of the interface between the water and the dock edges to allow easy access onto water and to encourage opportunities for additional activities on water for recreational, residential and commercial uses. The Trust considers that on water uses are an essential part of the character of the dock environments and essential to invigorating and creating lively, unique places.</p>	general comment	None
	Canal & Rivers Trust	87	<p>The docks should not be regarded as a hinderance and barrier to movement, rather they should be considered a resource with huge opportunity for positive wellbeing outcomes. Severance of people from the water needs to be addressed to unlock interactive, connected and enhanced water spaces with provision for infrastructure for water users. The Trust is keen to work with the GLA, Tower Hamlets and other stakeholders to achieve active, engaged docks within the Isle of Dogs and South Poplar.</p>	general comment	None

No	Respondent	No	Comment	Section / page	Action
	Canal & Rivers Trust	88	Tall buildings adjacent to our waterways can adversely affect ecology, overshadow moorings and have a negative impact on amenity value for both visiting boats and pedestrians on the dockside. Waterfront development should have regard to impact on the water space in terms of potential overshadowing and incorporate variety in terms of heights and breaks in frontage. Where tall buildings are proposed next to our waterways, we would seek heights appropriate and sympathetic to the waterside including setbacks and staggered heights leading away from the water.	general comment re tall buildings and impact on waterways	Actioned
	Canal & Rivers Trust	89	Sustainability + Utilities Waterways can be used for heating and cooling of buildings, and the Trust has been involved in many successful projects on our network, where developments have found the system to be more efficient than air source pumps. Developers should be encouraged to explore this and other innovative technology where their site is adjacent to water. We would like to see the use of water specifically referred to in this section.	p29 - the plan 2.2.	None
	Canal & Rivers Trust	90	Centre + employment Our waterways can encourage a recreation and tourism economy and provide an opportunity for commercial uses on water. The use of the water space itself is an opportunity for on water businesses and employment, facilitated by development around the docks. By encouraging these uses in appropriate locations, development plans can help the waterway attract more people and support the local economy. The framework seeks to diversify the employment on offer, and the use of water is one way of achieving this.	p36, 3.3	Actioned
	Canal & Rivers Trust	91	The housing strategy should recognise the contribution that smaller sites and residential moorings can make to the housing stock. Planning policies should support the provision of new moorings and facilities in appropriate locations, including encouraging developers to make provision for them within new waterside developments.	p34	None
	Canal & Rivers Trust	92	Our waterway corridors provide an ideal environment for sustainable active travel, can be used for the first/last mile of journeys and can have a positive impact on congestion as well as the health and wellbeing of local people.	p42	Actioned
	Canal & Rivers Trust	93	4.1.2 Transport and movement key principles The strategy should also refer to the links and connectivity with Limehouse Cut, Bow Creek and Regents Canal which provide excellent walking and cycling routes to and from the Isle of Dogs, away from road traffic. To support connectivity with these routes, improved wayfinding and public realm is key to increasing walking and cycling. It is positive to see reference to water transport in the strategy. Where it is appropriate to do so, waterborne freight transport during the construction and operation of development is able to support reduction of vehicles on roads and should be encouraged. The Trust has identified areas around the docks which could benefit from public realm improvements including trip hazards that need rectifying, wasted space, inappropriate planting and a lack of appropriate street furniture. The Trust would welcome the opportunity to become a delivery partner for the improvement works.	p49, 4.2.1	Actioned
	Canal & Rivers Trust	94	4.2 Social + community infrastructure Local communities should be able to use the docks as an area for social interaction. The Trust would like to see more emphasis on the positive impact water can have on both physical and mental wellbeing. The waterways themselves should be highlighted for the potential for social and community activities including sailing, canoeing, paddle-boarding and other activities. The street and dock path network can play a crucial role in leisure and sport – particularly given the links to the wider canal network and the Thames path.	p50	None
	Canal & Rivers Trust	95	4.3 Sustainability + utilities strategy The Trust supports enhancement of the environment and promotion of biodiversity and particularly improving the water quality and leisure value of the of the docks. Under the considerations listed for delivering green infrastructure, enhancing biodiversity and improving air quality, the Trust would like to see locations for 'floating reed beds' explored where appropriate.	p58, 4.3	Actioned
	Canal & Rivers Trust	96	Docksides are often suitable for telecommunication routes and the framework should highlight this opportunity.	p61	None
	Canal & Rivers Trust	97	Many developments drain surface water into our waterways, thus reducing the need to upgrade surface water sewers. This is subject to the Trust's agreement and requires controls to protect water quality. Water can also be used as a renewable source of energy to heat and cool buildings and then returned to the waterway. This can provide a cost and energy-efficient approach, which can reduce carbon emissions. The potential for both drainage into docks and heating and cooling should be referred to in the framework.	p62	Actioned

No	Respondent	No	Comment	Section / page	Action
	Canal & Rivers Trust	98	The Trust would like to see the 'area's unique waterfront location' added to, to include 'and dockside location' which is an important historic and cultural asset to the area and part of the character of the OA.	p68?	Actioned
	Canal & Rivers Trust	99	Existing character areas pages 72-85 and Emerging vision for the areas of change pages 86-109 Canary Riverside, South Quay, Millwall Waterfront and Crossharbour town centre all include part of the docks. The docks present an underutilised resource and asset for the communities in these areas. Development should take advantage of the water and the benefits it can provide. We are, in principle, supportive of the quality of dock spaces and public realm being intensified and the continued enjoyment of outdoor leisure activities related to the docks.	p72&78, 86-109	Actioned
	Canal & Rivers Trust	100	The Trust is generally supportive of the following key opportunities identified for these character areas: 5.3.3 Existing character Canary Wharf • 5.3.4 Existing character South Quay • The key opportunity identified for creating high quality waterfront spaces and dock path is supported. The Trust supports improvements to pedestrian and cycling connectivity and completion of dock and river paths for active leisure use. 5.3.5 Existing character Millwall & Cubitt Town • The Trust supports links and visual connections to the waterfront and improved wayfinding as key opportunities for the area.	General comment - support	None
	Canal & Rivers Trust	101	5.4.2 South Poplar the gateway to the Docklands • Waterside square addressing the dock; • Level changes from Aspen way footbridge to dock level at North Dock Square to encourage better interaction with the water; • A south facing dock promenade animated by seating, cafés and retail at North Dock path.	visions for change - support	None
	Canal & Rivers Trust	102	5.4.3 Canary Riverside promenading the Thames • Enhanced access to and environmental quality of the docks to maximise the amenity potential of the water space and improve legibility between the river and the docks of North, Middle & South Docks.	visions for change - support	None
	Canal & Rivers Trust	103	The proposals for Canary Riverside for promenading the Thames are a positive and exciting approach to enliven the Thames. The Trust considers these proposals should also be applied to the docks. The docks would benefit from all the proposals put forward in this section.	visions for change - support	None
	Canal & Rivers Trust	104	5.4.4 South Quay modern living by the water • Activating the dock edge with bars and restaurants for a vibrant local evening economy. Temporary moorings with pop up spaces and events; • North south residential streets connecting Marsh Wall to the waterfront and docklands heritage; • Buildings and public realm design celebrating the docklands heritage, referencing this in choice of materials and detailing, and incorporating dock infrastructure such as cranes; • The Dock path being widen where appropriate, to accommodate outdoor wining and dining along the pedestrianised route; • A new waterside green space celebrating the cutting between Millwall and South Dock • Millharbour and Limehouse Parks; • A pair of new dockside parks providing children's play space and amenities for youth and adults such as sports pitches and outdoor gyms; • A park linking Marsh Wall to South Dock (Meridian Park); • Coherent public realm treatment of the dock path, activated by bars and restaurants at South Dock.	visions for change - support	None
	Canal & Rivers Trust	105	The South Quay illustration on page 103 includes several dock crossings. It should be noted that any new bridges over our waterways require our permission and the approval of the Secretary of State for Environment, Food and Rural Affairs may also be required.	p103	None
	Canal & Rivers Trust	106	5.4.5 Millwall Waterfront between blue and green – living close to nature • Millwall will becoming a leisure and recreation destination where the community can enjoy a range of outdoor leisure activities on the water, dock edge and within new and improved parks; • Existing community assets such as Millwall Dock and the Docklands Sailing and Watersports Centre protected and enhanced to cater for a growing community. • Emerging development enhancing the setting and character of the docks, improving public realm and activating it with cafes and leisure uses; • Development will support intensification of water sports in the wider area; • New parks and open spaces will focus activity on the dock edge, with the dock path accommodating walkers, joggers and cyclists; • Greening dock edge and enhancing the biodiversity of the Docks through sensitive use of natural landscaping and material; • A built environment which promotes use of the dock edge and water for recreation.	visions for change - support	None
	Canal & Rivers Trust	107	Implementing the components of good design 5.5.3 page 112 Where Growth Area masterplans include docks, the Trust should be consulted as a key stakeholder. We offer a free pre-application advice service and would encourage developers to engage with us at an early stage.	p112	None

No	Respondent	No	Comment	Section / page	Action
	Canal & Rivers Trust	108	South Dock Footbridge The Draft OAPF refers to new crossings to increase connectivity. The Trust has provided preapplication advice on the proposed South Dock footbridge to the London Borough of Tower Hamlets. The advice given was generally supportive of the proposal, subject to several requirements including a commercial agreement, provisions of new pontoons to the west of the bridge, removal of the existing South Dock Bridge and specific dimensions to maintain navigation of the water space. We would wish to be consulted further in respect of the detailed design of any proposed crossings.	Delivery	None
	Canal & Rivers Trust	109	Outer Dock Slipway The Outer Dock Slipway has been identified as 'Parks and Greenway' . We would like to point out that the Trust owns land within this area and that it is not public park land as suggested by the document. We would therefore ask that this reference is deleted.	p107	Actioned
8	Ballymore	110	Ballymore welcomes the direction of travel of all these emerging documents and strongly supports the policy emphasis placed on delivering significant new homes and jobs within the OAPF area. welcome the GLA's decision to bring forward an OAPF for the Isle of Dogs and South Poplar and the general scope and ambition of the draft document itself	general comment - support	None
	Ballymore	111	Nevertheless, it is also clear that if the ambition for further growth and intensification is to be realised, there is a need for clear direction from both the GLA and LBTH on how new infrastructure will be delivered and funded – and the role to be played by new development in supporting delivery. We note the recommendations set out in Part 6 of the draft OAPF and whilst we strongly support the intent, we are concerned that the proposed delivery plan process will be multi-layered, protracted and resource intensive. This has the potential to delay, rather than facilitate, future development. We therefore urge both the GLA and LBTH to work closely together to set up a streamlined and well-resourced delivery body to work with developers/landowners, local community, utility companies, infrastructure providers and other key stakeholders. This should be actioned at the earliest possible opportunity and in advance of the OAPF being adopted. Furthermore, it should be made clear within the draft OAPF that decision making on new development will not be put on hold whilst a new delivery plan/body is brought into operation.	general comment - concern delivery. Part 6. Need for delivery body.	None
	Ballymore	112	Cuba Street site (vacant land at the North East Junction of Manilla Street and Tobago Street) – permission was previously refused in 2017 for a residential lead mixed-use scheme (proposing 434 residential units). Revised development proposals are now being formulated in consultation with LBTH and the GLA; • 161 Marsh Wall – a significant development opportunity at the western end of Marsh Wall containing a low density (and dated) office building; • The Design Cube – a business centre and marketing suite located within the Millwall Outer Dock which provides a medium to long-term opportunity to enhance the vibrancy and interest of the dock edge.		Actioned
	Ballymore	113	2.3 As highlighted by the above, Ballymore is delivering new housing within the OAPF area on a strategic scale and is making a significant contribution towards meeting local housing needs. Those developments currently under construction and those anticipated to come forward in the next 5yrs will deliver in excess of 5,000 new homes within the Isle of Dogs & South Poplar OAPF area.	general comment	None
	Ballymore	114	What is your vision for the future of the Isle of Dogs & South Poplar? We strongly support the continued identification of the Isle of Dogs & South Poplar as an opportunity area and we agree that it will play an increasingly important role at epicentre of the anticipated growth within East London. It is clear that East London and the identified network of opportunity areas will be vital in meeting London's development needs. In our view, the continued delivery of new development within the Isle of Dogs & South Poplar area will achieve significant benefits for the immediate locality, but perhaps more importantly; it will drive market confidence in the wider regeneration of East London (a critical objective if London is to meet the housing and job targets set out in the draft London Plan).	general comment - support/market confidence east London	None
	Ballymore	115	3.3 The OAPF area includes one of the most economically important areas in the UK (if not the World) and is extremely well connected by public transport (which will further improve following the opening of the Elizabeth Line). Whilst significant development has already occurred, we agree that the OAPF area continues to retain significant development capacity. Collectively, these factors mean that the area provides one of the most important opportunities to effectively and sustainably contribute towards meeting London's strategic development needs.	general comment - support development capacity	None
	Ballymore	116	We support the key opportunities identified for growth within the OAPF – particularly: • Maximising opportunities for a range of new homes to be delivered – meeting local and London-wide need; • Upgrading Canary Wharf to a 'Metropolitan Centre' and providing opportunity for further expansion in its role and range of services/retail offer; • Breaking down the physical and socio-economic barriers between Canary Wharf and the surrounding area; • Utilising the opening of the Elizabeth Line to stimulate further growth in housing and jobs; • Enhancing the environmental quality of existing green infrastructure – albeit, we recommend this objective is extended to include the network of docks and the river-side walkways.	general comment - support	Actioned

No	Respondent	No	Comment	Section / page	Action
	Ballymore	117	We agree that the OAPF area has the potential and capacity to exceed the draft local and strategic targets for new homes and jobs – and it is therefore important that all targets continue to be expressed as minimums within emerging policy documents. It is also important to recognise that the OAPF area has a key role to play in meeting London wide housing need and as such the opportunity for housing growth should be maximised.	general comment - support growth	None
	Ballymore	118	3.6 We note the sensitivity testing undertaken on the various growth scenarios within section 1.3 of the draft OAPF. Given the draft London Plan objective to deliver a high level of affordable housing; the continued need to upgrade and improve social and physical infrastructure and the funding gap identified in the accompanying Development Infrastructure Funding Study (DIFS) Nov 2017, we would urge the GLA and LBTH to work towards the high and maximum growth scenarios. In our view, this offers the best opportunity in realising the objectives referenced above.	general comment - support high growth scenarios	None
	Ballymore	119	It is also evident that the housing market is changing in London with new and innovative products coming forward. It is important that the OAPF (and future planning policy) does not stifle the opportunity for innovation and we recommend that the OAPF recognises and supports the opportunity for a range of housing types – including Build to Rent, co-living, discount market sale, and starter homes. These products have the potential to contribute towards meeting housing needs and increasing affordability for Londoners.	p34, housing strategy	Actioned
	Ballymore	120	3.8 As explained in section 1.6, we welcome the intention to adopt the OAPF as Supplementary Guidance to the London Plan. However, given the importance of the OAPF in supporting and delivering new development, there may be benefit in progressing the document through an Examination in Public to increase the planning weight given to the proposed policy approach.	suggest EIP/AAP	None
	Ballymore	121	Consultation Question – What should good growth in the Isle of Dogs & South Poplar mean? We broadly support the OAPF's approach towards achieving 'Good Growth' – in particular: <ul style="list-style-type: none"> • Delivering increased numbers of homes to meet local and strategic housing need. However, in our view, the OAPF should seek to deliver more than 31,000 homes to assist the delivery of the necessary social and physical infrastructure and support the delivery of affordable housing; • Balancing the delivery of housing with employment – although we believe this should be extended to include other uses (including leisure, retail and community uses); • Maintaining and enhancing the status of Canary Wharf as global business and financial centre. 	suggest addition to other uses	Actioned
	Ballymore	122	reference to the provision of a minimum of 35% as affordable housing. Whilst the need to deliver affordable housing is recognised (and supported), it is important that the OAPF remains flexible and is not prescriptive in setting a minimum % target. This approach departs from both the draft London Plan 2018 (Policy H6) and LBTH's draft Local Plan Review 2018 (Policy S.H1) where '35%' is expressed as a threshold (for the viability tested route) or as a target for individual schemes to meet, subject to viability.	p29, section 2.2	Actioned
	Ballymore	123	Given that new development is expected to make a significant contribution towards the improvement and upgrade of social and community infrastructure in the OAPF area, it is important that policy strikes a reasonable balance. For instance, where a scheme is delivering a new school or other community uses, it may not always be possible or viable to deliver a high level of affordable housing. In such cases, planning policy/guidance must recognise that an appropriate balance will be struck, which recognises scheme viability. Imposing an inflexible minimum requirement on affordable housing delivery may ultimately reduce the availability of funding and preclude the ability of new development to deliver/fund other key social infrastructure. We therefore urge the OAPF to express '35%' as a target, rather than a minimum.	p29, section 2.3	Actioned
	Ballymore	124	Support the improvement of improving public transport accessibility and improved connections within the OAPF area. We would also encourage the draft OAPF to consider how existing streets can be improved and made more pedestrian friendly. Whilst new development has significantly upgraded the pedestrian environment within the OAPF area, a number of the main adopted streets (including Marsh Wall and Limeharbour) continue to suffer from a poor pedestrian environment (despite significant S.106 and CIL funding being made available).	general comment support	None
	Ballymore	125	The creation of a utilities and sustainability strategy is also supported. In our view, the utility companies have a key role to play in ensuring that the identified scale of development for the OAPF area can be achieved.	general comment - support utilities strategy	None

No	Respondent	No	Comment	Section / page	Action
	Ballymore	126	Consultation Questions – Part 3: The Opportunities for Good Growth - As noted in our representations above, the OAPF should seek to deliver more than 31,000 homes to assist the delivery of the necessary social and physical infrastructure and to support the delivery of affordable housing.	general comment - support exceeding 31k	Actioned
	Ballymore	127	Identifies the permitted and future development sites within the OAPF area. We are pleased to note (and support) the inclusion of Ballymore's Cuba Street site and 161 Marsh Wall. We expect both sites to be brought forward for redevelopment in the short-term (i.e. the next 5 years). We would also recommend the inclusion of the Design Cube (located in the Millwall Outer Dock) as a 'future potential site'. Whilst the Design Cube is currently in use as a business and marketing centre, the intention is to consider potential development options in the short to medium term.	fig 3.1	None
	Ballymore	128	Fig 3.1 also continues to identify Orchard Wharf as a safeguarded wharf. It is apparent from the recently published Safeguarded Wharf Implementation Report (2018) that wharf capacity in London far exceeds current and predicted need. In particular, by 2041 wharf 'capacity' in the north east region (which includes Orchard Wharf) is predicted to exceed 'need' by 2.9 million tonnes per annum. This raises significant questions over the continued need to safeguard many of the protected wharves within the key regeneration areas (where there is significant need for other uses). We therefore urge the GLA to robustly review the status of Orchard Wharf (which has remained largely vacant since 1993) and consider whether an alternative approach should be pursued.	fig3.1	None
	Ballymore	129	<p>The Housing Strategy (Sections 3.2 and 3.4) makes reference to different levels of affordable housing provision having been tested to ensure that affordable housing is deliverable. The OAPF notes that a minimum figure of between 35% and 43% should be deliverable in each growth scenario. We have a number of observations on this statement:</p> <ul style="list-style-type: none"> • whilst the need to deliver affordable housing is recognised (and supported) it is important that the OAPF is flexible and is not prescriptive in setting a minimum target; • it is important that the OAPF is consistent with both the draft London Plan 2018 (Policy H6) and LBTH's draft Local Plan Review 2018 (Policy S.H1) where '35%' is expressed as a threshold (for the viability test route) or as a target for individual schemes to meet, subject to viability; • we understand that as part of the accompanying DIF study general viability testing has been undertaken. However, the testing appears to have adopted a very generalised approach and the viability assumptions adopted are not considered to be reflective of the challenges facing new development coming forward on certain sites within the OAPF area; • the methodology does not appear to test the impact on the viability of development (and affordable housing delivery) where new development is required to deliver a key piece of social infrastructure (i.e. a school); • the scenario testing does not appear to make allowances for predicted cost inflation or anticipated future trends in the capital value of residential accommodation. In particular, it is inevitable that continued inflation in build costs (which is predicted to outstrip any value increase) will have a significant and noticeable impact upon development viability; • it is not clear how the various assumptions have been applied since the viability scenario models do not appear to have been included within the DIF study; • it is unclear how Benchmark Land Value has been applied in the various scenarios – added to which, BLV is a complex issue for sites on the Isle of Dogs where market value for land has been increased by policy support for high density development. This often drives land values above BLV – even allowing for a 20% premium; • it is not clear whether the scenario testing has assessed the impact/benefit of other types of housing products including Build to Rent, co-living, discount market sale, and starter homes. These products have the potential to contribute towards meeting housing needs and increasing affordability for Londoners. 	sections 3.2 and 3.4	Actioned
	Ballymore	130	<p>In view of the above, it is important that the OAPF (and future policy) strikes a reasonable balance which recognises:</p> <ul style="list-style-type: none"> • the complexity of bringing forward individual development sites in the OAPF area; • that certain sites will be expected to deliver social/community infrastructure (i.e. schools, affordable workspace etc), which will increase development costs and may reduce the opportunity to deliver 35% affordable housing; • that the OAPF must be consistent with affordable housing policy as set out in both emerging local and strategic development plans; • that viability testing is an integral part of affordable housing policy for London. 	General comment on viability	Actioned

No	Respondent	No	Comment	Section / page	Action
	Ballymore	131	Part 6: Delivery and Monitoring Funding Recommendations It is noted that section 6.2 highlights the significant funding gap required to fund the enabling infrastructure which should be delivered in the first 5-10 years. Whilst it is recognised that CIL and S106 will provide some level of funding, the OAPF relies heavily on the further exploration of public funding sources. The lack of confirmed funding sources, calls into question the deliverability of the framework's aims and the effectiveness of the Framework. We therefore seek clarification with regards to the proposed funding streams.	Part 6	None
	Ballymore	132	We support the broad approach to emerging residential characters set out in Fig 3.2. However, we would recommend that the illustrative plan be updated and the various character areas be joined together. At present, the illustration includes large gaps (or white areas) between the various designations – meaning the approach to development within the white areas is unclear. We also recommend the Millwall Inner Dock tall building cluster should be extended slightly to the north west to include the completed Landmark development & the Leamouth cluster should be extended to the south east to capture the taller elements included within the Goodluck Hope (Leamouth South) development.	fig 3.2	Actioned
	Ballymore	133	<ul style="list-style-type: none"> • the overall transport and movement strategy is supported; • we would urge the GLA to investigate the re-opening of West India Pier – which could provide an alternative river crossing/service from Canada Water. The pier is only a short walk from Marsh Wall and Canary Wharf and would significantly increase connectivity into/out of the OAPF area; • the intended Thames Clipper pier/stop at Trinity Buoy Wharf should be included on Fig 4.1. Thames Clipper is expected to provide a stopping service at the recently upgraded pier in 2019/20; • we note that two potential River Lea crossings are identified on Fig 4.1. In our view, the northern link (from the Goodluck Hope development to the Limmo site in Newham) is unnecessary – given that the recently installed London City Island Bridge will provide direct access to the Limmo site. Rather priority should be given to the eastern crossing from Trinity Buoy Wharf to Thames Wharf (which is likely to be released for redevelopment following the completion of the Silvertown Tunnel). The inclusion of a footbridge will enable the continuation of the Thames path towards the Royal Docks; • as per our comments above, a number of the main adopted streets (including Marsh Wall and Limeharbour) continue to suffer from a poor pedestrian environment. We would urge LBTH (and GLA) to develop a strategy for upgrading the pedestrian environment in these key locations; • we support the extension of the Thames River Path and welcome the intended extension to Goodluck Hope and Trinity Buoy Wharf on the Leamouth Peninsula; • we welcome the draft OAPF's recognition that free state schools and private schools can make a key contribution in ensuring the delivery of primary and secondary schools within the area. Where a new school is to be provided as part of a new development, it is important that there is flexibility in identifying an operator (and a developer is not reliant on a state funded solution only). This will ensure that an operator can be found quickly to prevent development projects from being delayed; • we agree that addressing the deficit in green space within the OAPF area is difficult, given the physical constraints of the area, and we welcome the support for innovative solutions to the delivery of new open space. However, we recommend that greater focus is given to the dock areas and dockside walkways – which appear to have been omitted from previous open space calculations undertaken by LBTH. The dockside walkways already provide a vibrant network of well used open space – and there is considered to be significant scope for further improvement. For instance, there is considered to be potential to expand the walkways into the dock area itself (via platforms extending over the dock edge to increase useable open space and amenity opportunities (note: this is an approach adopted by many European cities). We would urge the OAPF to support and encourage options for improving and extending the dockside areas; • the involvement of the utility companies in the formulation of the OAPF is welcomed – and we would encourage both the GLA and LBTH to maintain their involvement as individual development projects come forward; • it is noted that LBTH is investigating alternative waste disposal options – including underground vacuum collection systems. Whilst alternative (and innovative) methods to waste collection are supported, future guidance/policy should not tie itself too closely to one particular technology or option. Ballymore would welcome the opportunity to discuss options for improving waste disposal with both LBTH and the GLA. 	Part 4+138:13913 9:139138:13 9139:1139:1 41	None

No	Respondent	No	Comment	Section / page	Action
	Ballymore	134	Section 5.3.2 (Blackwall & Leamouth) - Orchard Wharf is identified as a safeguarded wharf and continues to be promoted for re-use for sustainable freight transport. As per our comments above, whilst the site is still subject to a longstanding safeguarding direction, it is apparent from the recently published Safeguarded Wharf Implementation Report (2018) that wharf capacity far exceeds current and predicted need across London. By 2041 wharf capacity in the north east region (which includes Orchard Wharf) is predicted to exceed 'need' by 2.9 million tonnes per annum. We therefore urge the GLA to robustly review the status of Orchard Wharf (which has remained largely vacant since 1993) and consider whether an alternative approach should be pursued; • Section 5.3.4 (South Quay) – this section refers to the height of emerging residential towers as “predominately 40 storeys”. However, it should be noted that a number of current and permitted schemes with the South Quay area far exceed this height (Wardian – 55 storeys, South Quay Plaza – 68 storeys, Alpha Square – 65 storeys, Meridian Gate – 53 storeys etc). The reference should instead be amended to “residential towers of predominately 45-55 storeys”. • Fig 5.3 – the South Quay area of change should be extended to include 161 Marsh Wall as a “Site Allocation” – thereby ensuring consistency with Fig 3.1; • Fig 5.3 – we also recommend the inclusion of the Design Cube (Millwall Outer Dock) as a potential future development site;	5.3.2	None
	Ballymore	134	Section 5.4.1 (Blackwall) – the Thames River Path (identified on the illustrative plan on page 91) should be extended across the river frontage for Orchard Wharf and onto the Goodluck Hope development and Trinity Buoy Wharf. The Goodluck Hope development secures this connection and it would allow a direct link to the Thames Clipper pier on Trinity Buoy Wharf;	5.4.1.	Actioned
	Ballymore	135	• Section 5.4.4 (South Quay) – we support the opportunity to deliver high density residential developments within the area alongside bustling ground floor commercial uses and facilities for the local community. We also agree that it will be important to improve the quality of the dock spaces and public realm to support continued growth in the area; • Section 5.4.4 (South Quay - Indicative masterplan) – we support the broad approach outlined on the illustrative masterplan for South Quay (page 103). In particular, we support the inclusion of Ballymore’s development sites at Cuba Street and 161 Marsh Wall – which are both anticipated to come forward for redevelopment in the next 5 years. Whilst we note the reference confirming that the masterplan is not intended to be prescriptive, the level of detail included on the masterplan (particularly the location of open space) is considered unhelpful. For instance, the masterplan indicates the provision of new open space centrally within Ballymore’s Cuba Street site. Whilst this reflects the design of previous development proposals for the site, it is possible the site layout (and location of any open space) may change as a new development scheme is formulated for the site. It is therefore important that the masterplan illustrations included within the OAPF do not pre-judge the outcome of the future planning process for individual sites;	section 5.4.4	None
	Ballymore	136	• Section 5.5 – we note the encouragement is given to developers/landowners to establish working groups and develop Growth Area Masterplans. However, this process is unlikely to work unless the GLA and LBTH take a leading role in coordinating and establishing the priorities for each masterplan area – particularly where a number of landownerships exist; • Section 5.5 (para 5.5.8) – we recommend that this paragraph is amended to note that where building height strategies are to be developed, these should respond to the existing context “and the likely future context/vision”; • Fig 5.4 – as per our comments above, we support the identification of Ballymore’s development sites at Cuba Street and 161 Marsh Wall as “Future Potential Sites” on the plan. However, the plan should also identify the Design Cube located within Millwall Inner Dock.	Part 5 detailed design comments	None
	Ballymore	137	Agree needs to be a clear strategy for the delivery of new development and required infrastructure & vital that both the GLA and LBTH take a lead role in coordinating and implementing the future strategy. Recommendations set out in section 6.1 of the draft OAPF for establishing a delivery plan and process strongly supported, BUT we are concerned that the delivery process will be multi-layered (with a number of interconnecting forums, panels and steering groups), protracted and extremely resource intensive. Likely that the delivery plan (set out on page 117) could take a number of years to establish and reach full operation. This has significant potential to delay, rather than facilitate, future development.	Part Six: Delivery and Monitoring 6.1	Actioned

No	Respondent	No	Comment	Section / page	Action
	Ballymore	138	Given the importance in delivering new development in the short-term (i.e. next 5yrs), it is vital that LBTH and GLA confirm that both funding resourcing is already in place to implement the delivery plan. Furthermore, a timetable for implementing the delivery plan should be provided as a matter of urgency, alongside clear confirmation that decision making on new development will not be suspended whilst the delivery plan is put into action. At present, the draft OAPF is entirely silent on these important issues. Given our concerns above, we believe that consideration should be given to implementing a streamlined delivery plan focused on a single well-resourced delivery body solely responsible for working with developers/landowners, local community, utility companies, infrastructure providers and other key stakeholders. This delivery body should include representation from LBTH, GLA and TfL and be responsible for identifying and coordinating delivery of key infrastructure.	Part Six: Delivery and Monitoring 6.1	Actioned
	Ballymore	139	We broadly support the funding recommendations set out in section 6.2. Given that the extent of public mainstream funding for transport and social infrastructure is likely to be uncertain (at best), we support consideration being given to alternative funding solutions – particularly business rate retention, stamp duty retention, TIF etc. We are also aware that LBTH has received significant New Homes Bonus payments from central Government in recent years (2018: £20,749,465), which could also assist in supporting future infrastructure delivery. We agree that developer contributions (from S.106 Agreements and CIL rates) will have an important role to play. However, as mentioned above, it is important that the OAPF recognises that a reasonable balance must be struck. For instance, where a scheme is delivering or directly funding a new school or other community uses, it may not always be possible or viable to deliver a high level of affordable housing. Added to which, if GLA or LBTH CIL rates are significantly increased in the future, this will increase pressure on scheme viability and may impact upon the ability of new development to deliver affordable housing or provide key social infrastructure on-site.	Part Six: Delivery and Monitoring 6.2	None
	Ballymore	140	Out of the two case studies, the Croydon model would appear to be more closely aligned with the context and challenges likely to be experienced within the Isle of Dogs & South Poplar area.	general comment p127	Actioned
	Ballymore	141	• Section 5.4.1 (Blackwall) – as per our earlier comments, the illustrative plan (page 91) should identify the Trinity Buoy Wharf Thames Clipper Pier (due to come into service in 2019/20) and delete the northern bridge link (from the Goodluck Hope development to the Limmo site in Newham). In our view, priority should be given to the eastern crossing from Trinity Buoy Wharf to Thames Wharf (with the former site being released for redevelopment following the completion of the Silvertown Tunnel);	p91	Actioned
	Ballymore	142	the delivery body should avoid undertaking extensive studies or preparing masterplans and design strategies. A number of the evidence base studies identified under Recommendation 2 (page 119) would appear excessive, costly and potentially very time consuming. Ballymore would welcome the opportunity to work closely with both the GLA and LBTH (and any delivery body established) and would be more than happy to share their experience.	p119	None
	Ballymore	143	Ballymore also welcomes the intention to re-establish a reinvigorated Developer Forum – and is keen to be part of the forum once set-up. The previous LBTH run forum was a useful opportunity to share experience and provide important feedback. We also support continued close liaison with the Utility Companies.		None
9	New City College	144	The College is planning to re-develop its Poplar campus. This will be an ambitious project to create a flexible learning space that can be adapted to meet the changing priorities of local - and wider London - labour market. It will be a first choice destination for students, providing them with the skills and knowledge required to succeed. The College's re-development plans include a significant quantum of residential units, built to finance the development of the college campus.	general comment	None

No	Respondent	No	Comment	Section / page	Action
	the largest college in east London. It provides education and training to 20,000 students from 14 to 18-year-olds as well as adult learners. Around 4,000 of them study at the Poplar campus and most come from within Tower Hamlets. The college is a large employer with circa 1,200 employees in total of which circa 350 are based in Poplar.	145	The College is broadly supportive of the aims of the Isle of Dogs and South Poplar OAPF. The College's main concern on the OAPF is the inflexible approach it takes to building height in different parts of the OAPF area. Specifically, in the section on the emerging residential character of the area, figure 3.2. (inserted below) illustrates an assumption that tall buildings and subsequently high density developments would only be supported in specific clusters within the OA. Whilst the College recognises that there will be sites within the OA that are not considered suitable for taller buildings, there are locations outside of the proposed tall building areas that could be suitable. Limiting tall buildings to these defined areas could result in failure to maximise the potential capacity of some development sites. This guidance should be flexible to ensure, where the case can be made, tall buildings outside of these zones could come forward.	fig 3.2	None
	New City College	146	South Poplar has been allocated as a 'midrise family' area. It is unclear what scale of building might come forward in the high and midrise areas. It should be noted that buildings of circa 50 storeys have been permitted in the midrise areas, such as New Providence Wharf, and it should be made clear that the OAPF is not intended to be a brake on building heights or scheme densities where these might otherwise help to maximise delivery in line with the plan's ambition for growth. It should be noted that draft London Plan policies promote a proposed comprehensive design-led approach to determine the capacity of sites, rather than focussing purely on the connectivity of the site and the local context. Furthermore the draft London Plan tall building policy notes the role that tall buildings play in providing legibility, and that in some cases development will be at a scale that will enable them to define their own context.	p.34	Actioned
	New City College	147	Growth Scenarios We note that the high growth scenario, outlined in section 1.3, assumes lower densities of development than current development trends. As has been made clear in many application decisions and in the recalibration of the Mayor's own development policies around density, density itself is not at issue. High density optimises the potential of sites in line with the ambition of the OAPF. Where development is of a high quality, high densities should not be resisted. We therefore consider that a high growth (or presumably baseline) scenario, should not assume a continuation of current density trends but instead assume an increase in high density growth	p.16	None
	New City College	148	Barriers to Growth The OAPF provides an opportunity to plan positively for the future and improve connections throughout the OA. The unfortunate severance created by the construction of Aspen Way and the DLR in the 1980s has created a barrier for investment and constrained development. However, schemes such as the redevelopment of Poplar Business Park, Chrisp Street, Blackwall Reach and Republic; have each sought to carry the benefits of wider investment from the Isle of Dogs further north. The OAPF should encourage more investment north of Aspen Way and provide a framework for improving transport connections in this area.	1.2	Actioned
	New City College	149	Housing Strategy We support the identification of a minimum target for housing delivery. The OAPF should make clear that delivery at levels in excess of this target will be positively encouraged. Whilst we support the identification of a minimum target for 35% of these homes to be affordable, for the avoidance of doubt, and consistency with national policy, the OAPF should make clear that the percentage arriving from development proposals will be the 'maximum reasonable' up to a target of 35%. In addition, other potential community benefits of development proposals should be considered alongside affordable housing delivery.	3.2	Actioned
	New City College	150	We note that Section 5.1. outlines the need for joined up growth across multiple land ownerships. Policies that create interdependencies between adjoining land owners need to be carefully drafted if they are not to delay development coming forward. Policies that might start by looking at existing character areas as determinants of context also need to consider wider context, strategic ambition and emerging development in order to determine an appropriate form of development for a given site. Character areas should not prescribe scale and density, the delivery of which should be considered on a site by site basis.	5.1	None

No	Respondent	No	Comment	Section / page	Action
	New City College	151	Poplar is bound to the south by the very large scale infrastructure of Aspen Way and the DLR and it provides a home for the DLR depot. The towers of the Canary Wharf Estate to the south dominate the skyline, whereas the South Poplar side is mostly characterised by low quality older social housing. In our view, the area certainly does not have a 'village feel'. It is fundamentally urban in character and this urban context should be used to inform new development coming forwards. Poplar Business Park and Blackwall Reach have both shown how taller buildings can arrive north of the Aspen Way Corridor to break down the perception of Canary Wharf being the edge of such height. This strategy should be continued and encouraged.	5.4.2	None
	New City College	152	South Poplar Area for Change We support the vision for South Poplar and the emphasis to be placed on the College.	general comment - support vision for South Poplar	None
	New City College	153	The OAPF should set out an ambition rather than a prescription. The ambition to deliver a site wide masterplan should not delay development from coming forward, but a programme should be established for that piece of work now. Further, the OAPF should avoid prescriptive comments such as defining an ideal width for a passage way. The width of this road, and other similar roads, is dependent on multiple landowners moving forward with their re-development plans and refraining from building to their red-line boundaries. Target measurements are likely to create onerous conditions preventing development rather than supporting it. Instead, the OAPF should promote the ambition of wider passage ways opening up the transition from South Poplar to Canary Wharf.	p98	None
10	East End Community Foundation	154	<p>Propose that to support the long term viability of community social infrastructure and to promote community cohesion and access to opportunity, a proportion of CIL funds, perhaps 10%, raised from all the new development within the OAPF area should be designated for a new Isle of Dogs and South Poplar fund (50% expendable and 50% to an endowment) which could be managed by EECF working closely with the Mayor's office and with the local authority.</p> <p>With a potential population of 150,000 including a lot more social and affordable housing, and a large number of additional children and young people, the community infrastructure demands of the Isle of Dogs and South Poplar are likely to increase substantially.</p> <p>EECF is the product of the merger of two local community foundations – the Isle of Dogs Community Foundation (IDCF) and St Katharine's and Shadwell Trust, both established by the London Docklands Development Corporation. We are one of the leading Community Foundations of the UK and was The Charity Awards winner last year in the good practice grant-making and funding category. With £22m of assets under management and an annual grant expenditure of £1m we are a significant community asset in East London.</p> <p>Since its founding over 27 years ago we have had a unique role in supporting local community groups and projects in the OAPF area. We are the primary local grant making charity with strong roots into the local community.</p> <p>We are also uniquely regarded as a capable and dependable partner of Government. IDCF was the first community organisation to successfully lead a £3.8m Single Regeneration Budget (SRB5) bid. We have successfully managed European Social Fund grants and were appointed by London Borough of Tower Hamlets to manage a £5m programme of Section106 funding from two significant developments on the Isle of Dogs – the forerunner local planning document to the Draft OAPF.</p> <p>As EECF we were awarded and successfully managed programmes such as the national Grassroots programme from the Cabinet Office – having stepped in to deliver a matchfunded grant programme which other community foundations were unable to manage. We have been appointed by local Housing Association Poplar Harca to deliver their local grants programme. We are the local delivery partner for Comic Relief funds and for the Evening Standard Dispossessed fund. During the period when the Government appointed Commissioners oversaw London Borough of Tower Hamlets services, we were appointed to manage the assessment of applications for the Borough's mainstream grants programme. So, we are an experienced and reliable partner for the assessment of local need and the delivery of targeted grants programmes.</p> <p>Our grant making programmes are focused on the relief of poverty and access to economic opportunity.</p>	6.2, p125	None

No	Respondent	No	Comment	Section / page	Action
11	Lyca Group/Savills	155	supportive of the messages relating to the strategic growth of East London and the specific growth opportunities provided by the Opportunity Area, highlighted in Part 1. We welcome the recognition that despite high levels of growth in the area to date, there are still many further opportunities for growth within the OA.	general comment - support growth in OA	None
	Lyca Group/Savills	156	welcome the focus of the OAPF on delivery and endorse the ambition to ensure that the emerging OAPF is flexible enough to respond positively to any number of different social-economic futures that might emerge.	general comment support flexibility	None
	Lyca Group/Savills	157	Many sites will accommodate tall buildings on sites which are constrained in terms of their site area. The ability for individual sites to offer extensive opportunities for public realm is therefore limited. The OAPF must recognise the extent to which each site can and cannot contribute to this through a single application for development. Requirements that create interdependencies between adjoining land owners therefore need to be carefully drafted to ensure they do not prevent or delay development coming forwards. High quality placemaking and design is capable of being delivered on individual sites whilst respecting any wider masterplan or delivery vehicle.	general comments on prescriptive interdependencies	None
	Lyca Group/Savills	158	Part 3: Opportunities for Good Growth We support the ambition to ensure that development allows opportunities for local people to access employment and homes. This principle is well established through the existing planning system. With regard to the residential sector, house prices for new and historic properties remain unaffordable for many, even a maximum growth scenario cannot deliver the volume of homes that London needs at the pace required. It should be stressed, therefore, that all new residential development will go some way to meeting the need of Londoners for homes. This should be clearly recognised and acknowledged.	part 3	None
	Lyca Group/Savills	159	South Quay has been identified as a 'predominantly high rise, mixed use' area. It is unclear what scale of building might come forward in this area. It should be noted that buildings of 60 storeys have been permitted in the midrise areas and should be made clear that the OAPF is not intended to be a brake on building heights or scheme densities where these might otherwise help to maximise delivery in line with the plan's ambition for growth.	5.3.4	None
	Lyca Group/Savills	160	It should be noted that draft London Plan policies promote a proposed comprehensive design-led approach to determine the capacity of sites, rather than Figure 3.2 also introduces the notion of 'family' housing without explanation.	p35, fig 3.2	Actioned
	Lyca Group/Savills	161	support the identification of a minimum target for housing delivery. The OAPF should make clear that delivery at levels in excess of this target will be positively encouraged. We also support the identification of a minimum target for 35% of these homes to be affordable (at paragraph 3.4.1). However, to ensure consistency with national policy, the OAPF should make clear that the percentage arriving from development proposals will be the 'maximum reasonable' in the context of viability and other considerations. Delivery of new homes should not be delayed by unrealistic or inappropriate demands for affordable housing in the context of individual site viability.	general comment - support growth in OA	Actioned
	Lyca Group/Savills	162	location of affordable housing should be considered in the same context as the London Plan policies. Whilst there should be a preference for on-site provision noted in paragraph 3.4.3), the adopted plan for the Borough makes clear that there is a cascade of preference which can accept off site provision or payments in lieu. It is not the place of the OAPF to change or introduce new policy.	p.38, 3.4.3	Actioned
	Lyca Group/Savills	163	It is also unclear on what basis schemes might be required to over-provide communal amenity space (paragraph 3.4.4) and this should be deleted from the framework.	p38, 3.4.4	None

No	Respondent	No	Comment	Section / page	Action
	Lyca Group/Savills	164	The emerging residential character of the area, outlined in figure 3.2. (inserted below), is inflexible as it only supports tall buildings and subsequently high density developments within specified clusters within the OA. Whilst we recognise that there will be sites within the OA that are not considered suitable for taller buildings, there are locations outside of the proposed tall building areas that could be suitable. Limiting tall buildings to these defined areas could result in failure to optimise some development sites potential capacity. This guidance should be flexible to ensure, where the case can be made, tall buildings outside of these zones could come forward.	p35, fig 3.2	None
	Lyca Group/Savills	165	due consideration should be given to much wider range of employment opportunities than those discussed. The reality of land uses which result in positive job creation diversifies greatly and the benefits schemes which could include hotels as an employer for example, should be encouraged. This section seeks to make provision for SME's through the delivery of affordable workspace. It should be made clear that it is flexible terms rather than subsidised rents that should be provided to deliver space for SME's. Strategies around employment growth appear uniquely focussed on an anticipated increase in demand for new office space. Alternative scenarios, such as flexibility of lease agreements and size of units, should be tested and planned for accordingly within the OAPF. If an ambition to deliver subsidised workspace in schemes is to be included in the OAPF, the framework should acknowledge the impact this is likely to have on the delivery of other planning benefits and that the Borough and Mayor are making a positive choice in this regard.	p36, 3.3	Actioned
	Lyca Group/Savills	166	The plan sets out an ambition to further enhance the pedestrian and cycle networks within and beyond the Borough. The plan should recognise that provision for cyclists and pedestrians is already good and should identify specific opportunities where intervention is desirable and where upgrades should take priority over the delivery of other planning benefits.	local connections	None
	Lyca Group/Savills	167	The Development Infrastructure Funding Study (DIFS) assessment identifies significant infrastructure requirements in this regard and where the delivery of this infrastructure cannot be sustainably delivered by a tax on development profit alone, the Government, Mayor and Borough should be invited to subsidise development that delivers the highest densities of homes and jobs with allocated grant funding. The OAPF should set out how such funding might be accessed by the development industry. Perhaps this could be a first objective of the proposed 'Delivery Team' reference on page 117?	p117	None
	Lyca Group/Savills	168	We support the coordination of development proposals to ensure that sites enable rather than prejudice the delivery of planned routes, places and spaces but caution against the rigid requirement to bring sites forward together or for the delivery of specific proposals and the benefits flowing from each to be delayed though an overly prescriptive strategy around the delivery of infrastructure.	general comment	None
	Lyca Group/Savills	169	notes that school provision forecasts are maximum (i.e. worst case) scenarios and therefore unlikely realistic case scenarios. To avoid overprovision and the suppression of other plan objectives, these forecasts should be replaced with ranges based on different likely demographic trends and a median outcome adopted. Indeed, it is unclear what allowances are to be made to secure provision of primary and secondary schools on allocated sites in the development management process and this should be explained in the text of the OAPF. Given the parallel need for homes and schools, the delivery of one should not be held up by the need to deliver the other.	4.2.1	Actioned
	Lyca Group/Savills	170	Paragraph 4.2.3. notes that the Borough intends (and is willing) to rely on provision at the Olympic Park for swimming, 12 minutes north of Canary Wharf. The plan does not appear to consider whether other infrastructure uses might be located at the Olympic Park to make best use of this significant investment in infrastructure.	4.2.3.	None
	Lyca Group/Savills	171	We strongly support the DLR Underline Linear Park as an innovative response to the OA and Borough's needs for green and open spaces.	strong support	None
	Lyca Group/Savills	172	Policies that might start by looking at existing character areas as determinants of context need to consider wider context, strategic ambition and emerging development in order to determine an appropriate form of development for a given site. Character areas should not prescribe scale and density, the delivery of which should be considered on a site by site basis. Finally, as an overarching observation, it appears confusing to define one set of character areas in Figure 3.2 and another in 5.1. Consistency would be beneficial.	p34	Actioned

No	Respondent	No	Comment	Section / page	Action
	Lyca Group/Savills	173	Existing Character: South Quay Whilst the OAPF suggests a predominant new building height of 40 storeys, Landmark Pinnacle is 76 storeys, Alpha Square is 60 storeys, and Wardian is 55 and 50 storeys. Even Pan Peninsula, completes more than ten years ago is 48 storeys. Perhaps the OAPF should settle on 55 storeys as the typical median height.	p.78	Actioned
	Lyca Group/Savills	174	South Quay Area for Change - vision supported. Ambition for over delivery of communal space should be tempered if other priority delivery items are not to be suppressed. Coordinated servicing strategies need to be considered in the context of delivery phasing and the self-sufficiency of individual land parcels. Reference is made to creating 'comfortable' streetscapes and internal accommodation. This is unclear and reference should instead be made to existing environmental standards and precedent for their interpretation in high density urban areas. Whilst cranes area a feature in some locations around the docks, there are no surviving examples in South Quay and new crane structures should not be introduced. The 'underline' is supported alongside an animated dockside path, albeit widening should not be prescribed. In line with best practice around delivery, building plot parcels should acknowledge existing land ownership boundaries and building footprints.	south quay Area for change	Actioned
	Lyca Group/Savills	175	Section 5.5 continues to re-emphasise the need for multiple land owners to consider a comprehensive approach to development and possibly even arrange working groups. This approach appears wholly unrealistic and a potential impediment to growth as discussed in this representation. Whilst it is agreed that any new development would need to demonstrate how it sits into a wider masterplan or site allocation, seeking to arrange working groups for parties to share extremely sensitive commercial information is an ill-conceived approach to a plan which promotes extensive development. We suggest this element of the guidance is amended to reflect a desire for parties to collaborate but it is for the LPA to ensure that each site that comes forward, does so having due consideration to the cumulative impacts of that development.	5.5	None
	Lyca Group/Savills	176	South Quay: Local Connections - various potentials for delivering open thoroughfares throughout South Quay. In particular, it is noted that the indicative Masterplan (shown below) includes 'Meridian Park'. Whilst the public benefits of introducing a park are recognised, it is felt that these can be gained through a variety of means and design techniques and therefore proposals should not be restricted by a requirement to provide open park land within the site boundaries. Contributions to the public realm should be considered upon and reflected on as part of the design development for a site, and have the ability to evolve as a scheme progresses. Whilst labelling the plan indicative is helpful and necessary, such a diagram could set unrealistic expectations of what is practicable and viable to deliver. New open space will be important in terms of good design and good place making principles for any re-development but this could come forward in a variety of ways and the framework should therefore be clear in terms of flexibility of delivery.	5.4.4. 'Meridian park'	None
12	BA Pensions/Savills	177	Duplicate comments as representation 11		None
13	Savills	178	Duplicate comments as representation 11		None

No	Respondent	No	Comment	Section / page	Action
14	OHG/Quod - One Housing's extensive interests across Tower Hamlets as one of the largest housing association in the Borough, managing over 5,100 homes. This includes approximately 3,500 homes in the Isle of Dogs and South Poplar area. One Housing also works regularly with local authorities and residents elsewhere to consider all options to improve the quality of the stock they own and manage, and to provide new homes and opportunities to meet their wider mission.	179	<p>One Housing aim to build affordable homes for people who struggle to afford a place to live. The emerging Tower Hamlets Local Plan 2031 states that at least 21,100 new affordable homes are required over the plan period (2016 – 2031), assuming the level of housing support through Universal Credit remains constant. This equates to an average of 1,407 dwellings per year (45% of the overall need), highlighting the urgency of delivering against this aim within the Borough.</p> <p>There are two principal ways that One Housing achieves its aim: by regenerating its existing housing stock; and, by building new affordable housing. The main sources of funding for these activities are building, selling and renting homes on the open market and other commercial ventures.</p>	general comment	None
	OHG	180	The Mayor's Good Practice Guide to Estate Regeneration: Better Homes for Local People (February 2018) recognises that suitable approaches to regeneration will vary from minimal intervention to more ambitious regeneration plans. One Housing is committed to working closely with residents and communities to provide full and transparent engagement and consultation, should any changes to existing homes be considered. One Housing therefore welcomes the strong focus on community engagement within the draft OAPF, most notably section 3.2: 'Housing Strategy' which asserts that "estate regeneration schemes... would only come forward following full and transparent consultation with residents".	section 3.2	None
	OHG	181	One Housing recognise the importance of delivering 'good growth' and are supportive of its role at the heart of the draft OAPF. The emerging London Plan (December 2017) confirms how important the delivery of affordable housing is to achieving 'good growth': "Affordable housing is central to allowing Londoners of all means and backgrounds to play their part in community life. Providing a range of high quality, well-designed, accessible homes is important to delivering Good Growth, ensuring that London remains a mixed and inclusive place in which people have a choice about where to live" ¹ . In the context of the Isle of Dogs and South Poplar area, the draft OAPF seeks to deliver 'good growth' by taking a balanced design-led approach to development capacity. It recognises the sizeable existing population and is underpinned by more community consultation than would typically be appropriate, which is supported by One Housing.	general comment - supports good growth	None

No	Respondent	No	Comment	Section / page	Action
	OHG	182	<p>Range of estate regeneration interventions</p> <p>The Mayor's Good Practice Guidance to Estate Regeneration: Better Homes for Local People (February 2018) acknowledges that there are various physical interventions which might be adopted to support estate regeneration, ranging from repairs to comprehensive redevelopment, and that the appropriate response will vary between estates.</p> <p>"The range of physical interventions available to support the delivery of estate regeneration projects includes: repairs to, and refurbishment of, existing homes; building new homes on 'infill' sites; and demolition and rebuilding. Different schemes will require different interventions, or a combination of some or all of the above: there is no 'one size fits all' approach"².</p> <p>A pragmatic and bespoke response will therefore be required for individual projects, which should be informed by the considerations including (but not limited to):</p> <ul style="list-style-type: none"> • the existing characteristics and quality of an estate; • the financial resources available; • any regeneration or redevelopment plans that affect the wider area; and • the wishes of residents and other stakeholders. <p>Proposed Amendment – Paragraph 5.5.12, draft OAPF The purpose of the OAPF is to strategically guide development in the Isle of Dogs and South Poplar. suggest amend as shown below to introduce some additional clarification: The Good Practice Guide to Estate Regeneration: Better Homes for Local People (February 2018) recognises that estate regeneration comprises "various combinations of refurbishment, investment, intensification, demolition and rebuilding".</p> <p>It is considered reasonable that the level of additional design work identified in the OAPF would only be triggered when a significant amount of redevelopment occurs, as this brings the commensurate potential to improve the wider estate and its integration into the surrounding neighbourhood.</p>	para 5.5.12	Actioned
	OHG	183	<p>Timing of possible estate regeneration - The draft OAPF is reasonable in assuming that higher levels of growth (i.e. above the baseline scenario) could commence from 2022 onwards³. This appears at odds with the approach taken to estate regeneration, where partial or full estate regeneration is assumed to only occur post-2031 without presenting underlying evidence or justification. Without the underlying evidence to support this it is not reasonable to assume that any form of estate regeneration couldn't happen before 2031. It is possible that, with resident consultation and subject to a ballot, estate regeneration could happen earlier. It is therefore suggested that proportionate flexibility should be added to the draft OAPF.</p>	1.3	Actioned
	OHG	184	<p>Proposed Amendment – Section 1.3, draft OAPF The draft OAPF rightly acknowledges that growth generally within the Opportunity Area is dependent on a range of variables but this flexibility is not applied to estate regeneration. It is therefore proposed the assumption that full or partial estate regeneration would only occur post-2031 in the high and maximum growth scenarios (Section 1.3) should be removed.</p>	1.3	None
	OHG	185	<p>2 Section 2 (page 8), Mayor's Good Practice Guidance to Estate Regeneration (Better Homes for Local People) (February 2018)</p> <p>"Should any form of estate regeneration come forward in the future, that includes significant demolition and rebuilding of existing homes sufficient to be referred to the Mayor*, additional design work will need to be considered to ensure any proposal takes the opportunity to truly reintegrate into the surrounding neighbourhood".</p> <p>* Under the criteria in the Mayor of London Order (2008).</p>	p8	Actioned

No	Respondent	No	Comment	Section / page	Action
	OHG	186	<p>Growth scenarios</p> <p>One Housing support the acknowledgement in the OAPF that a range of variables may impact on the future rate of growth within the Isle of Dogs and South Poplar. They are therefore encouraged by the flexible approach taken to growth within the draft OAPF and the associated growth scenarios and the proposal to regularly monitor and review the OAPF.</p> <p>Opportunity Areas are London's major source of brownfield land and the intention of their designation is to assist and encourage their redevelopment to unlock the significant capacity for housing and commercial uses. Policy SD1(B6) of the New Draft London Plan (2017) suggests that Boroughs should "meet, or where appropriate exceed, the indicative guidelines for housing and/or indicative estimates for employment capacity" set out in the Plan. The adopted London Plan (2016) sets minimum targets for housing delivery, as recognised within section 1.34 in the draft OAPF. Proposed Amendment – Baseline Growth Scenarios in the draft OAPF It is therefore considered that the 'baseline growth scenario' would be better defined throughout the draft OAPF as the "minimum growth scenario". This would ensure consistency with the language used in other Mayoral planning documents including the London Plan and the stated intention of Opportunity Areas to deliver growth.</p>	1.34 - growth scenarios	None
	OHG	187	<p>The OAPF notes that this scenario is 'aligned with the draft LBTH Local Plan and New London Plan targets' (section 1.3) and that the London Plan sets minimum targets for housing delivery. Renaming the scenario in this way would therefore be clearer and more consistent with policy in the London Plan.</p>	section 1.3	Actioned
	OHG	188	<p>"This chapter has not considered the potential for estate regeneration. Should any form of estate regeneration come forward in the future, that includes significant demolition and rebuilding of existing homes sufficient to be referred to the Mayor", additional design work will need to be considered to ensure any proposal takes the opportunity to truly reintegrate into the surrounding neighbourhood".</p> <p>* Under the criteria in the Mayor of London Order (2008).</p> <p>The Good Practice Guide to Estate Regeneration (February 2018) recognises that estate regeneration comprises "various combinations of refurbishment, investment, intensification, demolition and rebuilding".</p>	5.5.12	Actioned
	OHG	189	<p>The draft OAPF does not expand upon Policy D8: 'Tall Buildings' in the draft New London Plan (December 2017) to clarify what constitutes a tall building in the context of the Isle of Dogs and South Poplar. This is particularly relevant given existing/permitted high density development and evidence that growth levels beyond the Tower Hamlets Local Plan 2031 (Regulation 19) (October 2017) could, in principle, be sustainably delivered.</p> <p>It is recommended that the heights which would require proposed developments to be referred to the Mayor of London under the Mayor of London Order (2008) should be adopted to define tall buildings within the Isle of Dogs and South Poplar area for the purposes of the draft OAPF.</p> <p>The New London Plan (December 2017) states that for the purpose of assessing applications referable to the Mayor, a tall building is a development that meets one or more of the following descriptions:</p> <ul style="list-style-type: none"> • it falls within the Thames Policy Area and is more than 25m in height • it falls anywhere else within the City of London and is more than 150m in height • it is more than 30m in height elsewhere in London. <p>To ensure a consistent approach by the Mayor and to minimise the potential for confusion, it is considered that the heights referred to above and which would require proposed developments to be referred to the Mayor of London under the Mayor of London Order (2008) should be adopted to define tall buildings within the Isle of Dogs and South Poplar area for the purposes of the OAPF.</p>	fig 3.2	None
	OHG	190	<p>Baseline growth scenario (page 17) Amend the name of the "baseline growth scenario" to "minimum growth scenario".</p> <p>The OAPF recognises that the London Plan sets minimum targets for housing delivery and renaming the scenario in this way would be clearer and more consistent with the London Plan.</p>	p17	None

No	Respondent	No	Comment	Section / page	Action
	OHG	191	Section 1.3 Remove the assumption that full or partial estate regeneration would only occur post-2031 in the high and maximum growth scenarios. The draft OAPF reasonably assumes that higher levels of growth (i.e. above the baseline scenario) could commence from 2022 onwards (figure 6.2). This is inconsistent with the approach taken on estate regeneration, where partial or full estate regeneration is assumed to only occur post-2031 without justification. It is reasonable that evidence base studies, consultation and ballots could conclude that estate regeneration is appropriate significantly prior to 2031.	1.3	None
15	Canary Wharf Group	192	The text clearly acknowledges how constrained the Isle of Dogs is in particular being compact in area surrounded on all sides by the River Thames and only having one road on and off the island. Fig. 1.1 then highlights expectation for growth in the IODSP OA as well as OAs to the east and north. The cumulative effect of all these growth areas coming forward will be detrimental to achieving the Mayor's objective of 'good growth' if significant and meaningful social and transport infrastructure is not put in place in this OA. The draft OAPF must address this.	1.1 p.10-11	None
	Canary Wharf Group	193	We disagree with the general statement that there are "physical and socio-economic barriers between Canary Wharf and the surrounding area." If these 'barriers' existed in a general sense why would there be the amount of development that has either taken place or is in the pipeline to take place around Canary Wharf? All marketing material associated with these developments refer to the proximity of Canary Wharf for social, transport and leisure infrastructure. This statement should be deleted or amended to provide greater clarification. The provision of the Elizabeth Line station at Canary Wharf has had a catalyst effect for attracting new development in the area but the capacity of the Elizabeth Line will not support the growth being in this OA. Additional strategic transport infrastructure needs to be put in place and this should be reflected in this draft OAPF.	1.2 p.14	Actioned
	Canary Wharf Group	194	The thick arrow running north-south and east-west across the site should be removed. It is misleading and does not define local connections. The planning permission for Wood Wharf allows for up to 3,610 homes. The relevant annotation should be updated accordingly. The base plan for Wood Wharf is not reflective of the scheme that has planning permission and is under construction. This should be updated accordingly. It is not clear why key sites like North Quay, Riverside South and Billingsgate are not identified as site allocations when they are in the draft local plan and when they will clearly deliver significant numbers of new jobs and new homes. This should be amended. Canary Wharf is now identified in the draft London Plan as a Metropolitan Town Centre. This should be reflected in the key as a separate legend distinct from the town centre legend.	1.3 p.15	Actioned
	Canary Wharf Group	195	As stated in 1.2 above we don't agree with the comment "Addressing physical severance and barriers to accessing infrastructure, jobs, and services to ensure IoD&SP share the benefits of Canary Wharf." The area around Canary Wharf and London is already benefitting from the success of the regeneration of Canary Wharf. The draft OAPF talks about combining sites to deliver open space. We support this but it is unclear how this will happen in practice. This need to be made clearer in the OAPF.	1.4 p.20	Actioned
	Canary Wharf Group	196	Second sentence is missing some text. Reference to "maximising investment in transport capacity upgrade", but there are no serious proposals in the draft OAPF for significantly increasing transport capacity. We have concerns about the soundness of the evidence base. See detailed representations enclosed ON DIFS & TRANSPORT.	2.1 p.22, Para. 1.5.1 & 2.2 Page 23, Para. 1.5.2	Actioned

No	Respondent	No	Comment	Section / page	Action
	Canary Wharf Group	197	In terms of "maintaining the status of Canary Wharf" reference should also be made to retail, leisure and residential in addition to business and financial service location.	2.3 p.26	Actioned
	Canary Wharf Group	198	The diagram needs to be updated as follows: - No key for the green outlined areas on the map and we query whether these are shown in the correct locations; - New strategic link shown across the Aspen Way Footbridge through the North Quay site should be referred to an enhanced or improved link as there is no intention to create new link here; - Nothing in the key to indicate what the grey dotted lines are and if these are not shown in the correct locations; - CAZ A equivalent area shown over part of the Wood Wharf site that has residential building on it. This should be removed; - New strategic link shown from the northern end of Upper Bank Street over Aspen Way. This will be very technically challenging to deliver if at all possible and is not consistent with the emerging draft Local Plan. The annotation should be removed;	2.4 p.27	Actioned
	Canary Wharf Group	199	A balance needs to be struck between delivering more homes in the OA and delivering a minimum of 35% affordable housing. OA by their very nature can face more challenges around viability and therefore there should be some flexibility around the 35% requirement. Reference to viability needs to be included. The proposals under "Transport + Movement" are passive and will not adequately mitigate any of the development capacity scenarios being proposed. This needs to be revisited.	2.5 p.28	Actioned
		200	We have challenged the 110,000 new jobs figure referred to in the draft London Plan (see a copy of our representations attached). This figure should be revised.	jobs figures	None
	Canary Wharf Group	201	We support proposals for joining up site ownerships to deliver new connections etc., but in particular parks/open spaces. However the OAPF should go further by identifying such sites for parks/open space and suggesting that compulsory purchase powers will be used to ensure delivery. Developers in the area who cannot deliver the required amount of open space on their sites should make financial contributions towards this process.	2.6 p.29	None
	Canary Wharf Group	202	Diagram should show bridge link between the Wood Wharf site and Canary Wharf and per the detailed consent.	3.1 p.32-33	None
	Canary Wharf Group	203	The various growth assumptions for housing are very optimistic and are not backed up by the necessary social and transport infrastructure that needs to be delivered in order to support that level of growth particularly if that growth is to amount to good growth. The affordable housing percentages of between 35% and 43% are not realistic and not supported by robust evidence. If the draft OAPF wants to achieve even the baseline amount of new homes the affordable housing expectations need to be reviewed with a view to being more flexible.	3.2 p.34	Actioned
	Canary Wharf Group	204	North Quay and Riverside South sites should be part of the Canary Wharf tall building cluster given their existing implemented planning permissions. Diagram should be amended accordingly.	3.3 p.35	None
	Canary Wharf Group	205	The draft OAPF states that expanding the retail and employment functions of Canary Wharf will be key to maintaining and improving its strength and success of this place. As we have previously stated particularly in the pre-application discussions we had with the GLA and LBTH on our recent North Quay proposals, whilst this is true this will not happen if we are not able to also bring in other land uses to this place particularly residential. Residential is key to maintaining a thriving town/metropolitan centre. It creates a more diverse and vibrant environment which is now highly sought after by businesses and their employees looking to establish here. If we are to continue increasing jobs in this location we must be able to deliver residential development too. The draft OAPF should be amended to reflect this.	3.4 p.36	None

No	Respondent	No	Comment	Section / page	Action
		206	The draft OAPF recognises that delivering office space outside of the Canary Wharf core is vital. We support this but the draft OAPF needs to be go further in ensuring that this happens. We have seen many sites around Canary Wharf which previously had employment uses on them being redeveloped for residential development with some small 'token' commercial space being provided in some instances. This is not good enough. Greater emphasis should be placed on providing a good amount of quality smaller unit office space which would attract business that would support the businesses in Canary Wharf.	3.4 p.37	None
	Canary Wharf Group	207	The grey line running up from the bottom of the Isle of Dogs through to South Poplar needs to be revised. It's misleading as it is suggesting that the heart of Canary Wharf town/metropolitan centre is to the east of where it really is. The Crossrail Station symbol has also moved to the east to conveniently line up with this line; this is not accurate. The main entrance to the Crossrail station is further west directly opposite One Canada Square. This diagram needs to be amended accordingly.	3.5 p.37	Actioned
	Canary Wharf Group	208	As stated above we don't support a minimum of 35% affordable housing. There must be a degree of flexibility introduced and the amount of affordable housing that can reasonably be provided needs to be subject to a viability testing process.	3.6 Page 38, Para. 3.4.1	None
	Canary Wharf Group	209	3.7 Page 38, Para. 3.4.2 This is too prescriptive. Draft London Plan is not prescribing housing mix. Delete text. 3.8 Page 38, Para. 3.4.6 Reference to 'draft Housing Management Plans'. Having to go through this process would slow down the delivery of development. Nor appropriate for an OAPF document to be seeking this. 3.9 Page 39, Para. 3.4.7 Refer to comments above in respect of job numbers and the need for flexibility around land uses. Amend text accordingly.	3.7, 3.8, 3.9	Actioned
	Canary Wharf Group	210	We are very concerned that the amount and type of infrastructure being proposed is not sufficient to meet the various growth scenarios. We are also concerned that infrastructure will not be delivered. The draft OAPF needs to be more robust and specific about where, how and when the infrastructure will be delivered.	4.1 Pages 42-43	None
	Canary Wharf Group	211	The draft OAPF recognises that "transport is fundamental to delivering this good growth..." but the improvement measures that are being proposed are all passive e.g. walking and cycling and will not support the amount of growth being proposed. Whilst we support these passive measures, they have to be part of much more significant strategic transport improvements such a new a train line. We have made separate representations on this in respect of the Mayor's Transport Strategy which we have attached for reference. If significant strategic transport measures are not proposed in the draft OAPF, good growth will not happen and as such we cannot support the growth scenarios being proposed. Why on the diagram is a greater emphasis being shown in respect of the proposed new South Dock bridge? This should be amended. It should also be made clear that this is proposed, not existing. We do not support a cycling route over the proposed new South Dock bridge through the Canary Wharf estate. There would be too many conflicts with pedestrians which have to be the priority. A distinction between existing and proposed walking/cycle/bus/river connections should be made clear. There is no bus route over the proposed Montgomery Bridge connection from Wood Wharf to the Montgomery Street. The diagram needs to be amended accordingly.	Pages 44-45	None

No	Respondent	No	Comment	Section / page	Action
	Canary Wharf Group	212	<p>New bridge link from Upper Bank Street over Aspen Way to South Poplar shown. See comments under 2.4 above. We dont think this will be feasible.</p> <p>For the avoidance of doubt no new bridge links are being proposed as part of any redevelopment proposals for the North Quay site. As part of the pre-application discussions on the previous planning application for the site it was agreed with the GLA, TfL and LBTH that enhancements to the existing Aspen Way footbridge was acceptable.</p> <p>An enhanced cycle route appears to be shown passing through our North Quay site. This is not acceptable and it was agreed with TfL as part of our previous planning application discussions that a dedicated cycle route will not pass through the site; there will be too many pedestrians and there are significant level changes. Accordingly the diagram needs to be updated.</p> <p>The diagram places undue emphasis on a link through to the Canary Wharf over the proposed new bridge over South Dock. As such this suggests that the route over the existing bridge over South Dock to the west is less important. This is not correct and should be amended accordingly.</p> <p>A cycle route is being shown over the proposed bridge over South Dock. As advised previously this will not be supported by Canary Wharf as there will be too much conflict between pedestrians and cyclists and pedestrians are the priority.</p>	4.3 p.46-47	None
	Canary Wharf Group	213	The OAPF acknowledges that "further capacity is vital to support both existing communities and further growth." It is therefore surprising that the only strategic transport proposals are improved frequencies on both the DLR and Jubilee Line. Our analysis shows that even with the Elizabeth Line, and DLR and Jubilee Line upgrades there will be very limited spare capacity in the public transport network for this area (see attached). If the amount of growth being proposed in the draft OAPF is to succeed then proposals for significant improvement in strategic transport in addition to those proposed need to be brought forward and should be clearly set out in this OAPF.	4.4 Pages 48-49	None
	Canary Wharf Group	214	We are concerned that the amount of social and community infrastructure required to support the various growth scenarios has been underestimated. There is also lack of clarity as to how the OAPF will actually ensure that the necessary social and community infrastructure proposed will be delivered and where it will be located. (See attached for more detailed comments on this section of the draft OAPF).	4.5 Pages 50-57	None
	Canary Wharf Group	215	A 'community hub' is shown on the diagram page 51 on our Wood Wharf site, but there this is not part of the planning permission that is current being built out. Although our Wood Wharf development is proposing significant social and community infrastructure which are perhaps the components of a 'community hub' it would be misleading to suggest that a 'community hub' would be provided in one location. The diagram should be amended accordingly.	p51	Actioned
	Canary Wharf Group	216	Reference made to a library on the Wood Wharf site. The OAPF should make clear that this is only in the event the existing library (Idea Store) at Churchill Place is not retained and no other Idea Store comes forward on the Island. The existing Idea Store at Churchill Place is in the centre of Canary Wharf and is very well established. Therefore the current proposal is to enter into a new lease with the Council to retain it.	4.5 Pages 50-58	Actioned
	Canary Wharf Group	217	A proposed district heating centre is shown on the North Quay site. This does not however form part of the North Quay planning application. What background work has been prepared to support this request? This should be removed.	4.6 Page 59	None
	Canary Wharf Group	218	Reference to skills and training facilities on Wood Wharf should be removed as this is not within the development proposals.	4.7 Page 65, para. 4.4.27	None

No	Respondent	No	Comment	Section / page	Action
	Canary Wharf Group	219	A "New and Improved connection between Poplar + Canary Wharf" is shown in the location of the existing Aspen Road footbridge. As explained above, this connection will be "improved" and not "new". The reference to "new" therefore needs to be removed. As stated above the proposed new connection across Aspen Way from Upper Bank Street is very technically challenging if at all possible. The OAPF needs to recognise this. The existing bridge over South Dock opposite the West Winter garden is identified as being "new or improved". What is being proposed? It is not clear in the draft OAPF.	5.1 Pages 70-71	Actioned
	Canary Wharf Group	220	Reference made to Wood Wharf being a "residential neighbourhood". It would be more appropriate to describe it as a "mixed use neighbourhood comprising xxxx" or a "residential neighbourhood with offices, retail, leisure, community, etc uses". Given that residential development is coming forward in Canary Wharf and identified in LBTH's site allocation, a further key opportunity should be "Achieving high quality homes, streets and amenity at high resi densities" (as per the South Quay opportunities on page 78).	5.2 Page 76	Actioned
	Canary Wharf Group	221	Under public realm reference made to "semi-privatised" and "semi-public". This is misleading. Both should be referred to as publically accessible. Under height and massing, not all buildings do step down from Canary Wharf – Hertsmere House, Newfoundland and the extant North Quay and Riverside South schemes are some examples. This needs to be reworded accordingly.	5.3 Page 77	None
	Canary Wharf Group	222	Given that the majority of the 'South Poplar' area of change lies within Canary Wharf (as shown on the diagram on page 33), it should be renamed "Canary Wharf and South Poplar". By identifying it as South Poplar only, people will view what is appropriate in terms of development quantum/scale differently. Under South Quay we don't think it is accurate to describe the area as having "bustling ground floor commercial uses.."	5.4 Page 86	None
	Canary Wharf Group	223	<p>The 'CAZ A Equivalent' boundary needs to be marginally pulled back from the southern boundary of our North Quay site so that is clear that the North Quay site is in CAZ B. The reference to "employment led mixed use" in CAZ B should be changed to "CAZ strategic functions led mixed use" in line with the CAZ SPG.</p> <p>The Mayor's forward to the OAPF refers to the need to focus development in town centres and to intensify development around wellconnected transport nodes with the Isle of Dogs having some of the best transport links in London. The 'Strategic Vision' also refers to the IoD and South Poplar sitting at the heart of a wider East London growth area (Section 1.2. states they have a key role at the epicentre of this growth) and has the potential to make a significant contribution to meeting London's housing and employment needs. The Strategic Vision diagram states that growth will be focussed along transport corridors and strategic transport upgrades such as the Elizabeth Line and DLR. North Quay sits on top of the Elizabeth Line station and Poplar DLR station and development on the site should be maximised. By imposing a height transition within Canary Wharf will only constrain development in the main area that will help deliver jobs and homes. As above, other approved developments in this part of Canary Wharf do not have a significant step-down from One Canada Square. The diagram should therefore be made clearer.</p>	5.5 Pages 92-93	Actioned

No	Respondent	No	Comment	Section / page	Action
	Canary Wharf Group	223	<p>5.6 Pages 94-95 'Delta Junction' - this can't just be a pedestrian space, it has to accommodate vehicles as well, and is likely to be the principal vehicular and servicing access to the future North Quay development. The text should be reworded accordingly. Also pre-application discussions with DLR on the previous development proposals indicated that the space could not be covered so the uses suggested would not be acceptable.</p> <p>'North Dock Square' should be referred to as 'Public Space'. Given the level changes it will never be a square in the traditional sense.</p> <p>'South Poplar to Canary Wharf' – North Quay does not propose a new, green bridge link. There is an existing bridge link which is fit for purpose and is being retained.</p> <p>The "Key proposed building frontage" annotation show key frontages on every side of all buildings; this is unachievable. There must be servicing on at least one of them. Further the extent of the proposed building area footprint should be extended to reflect the previous proposals, the principles of which were accepted.</p> <p>A 'Primary Connection' is shown across the Aspen Way footbridge route across Aspen Way has been viewed more as a secondary connection. Further this route is being promoted as a cycling route. This is not realistic given the change in levels and the likely pedestrian flows within the future North Quay development. This should be amended accordingly.</p> <p>As stated above extending Upper Bank Street across Aspen Way will be technically challenging. This needs to be reviewed. 5.7 Page 97 Wood Wharf bridge connection to Montgomery Square not shown in the approved position</p> <p>5.8 Pages 102-103 Reference to a cycling connection over the both the existing and proposed new South Quay footbridges is misleading. These routes can be accessed by cyclists pushing their bikes over the bridge but they won't be able to cycle on the bridges given the pedestrian flows. This should be made clearer.</p> <p>Link 13 not realistic as this is the lock entrance to the docks.</p>		
16	East India Dock	224	The type of development which has been consented and is currently underway at Republic, includes the creation of active and animated bases of the existing office buildings including Retail, Restaurant and Leisure spaces to provide the range of spaces required for an agile working environment to thrive. In addition, the works include a new public realm scheme which seek to provide a range of meeting and resting spaces for the users of the estate.	Context	None
	East India Dock	225	broader mix of non-commercial land uses than currently exist on site to compliment the significant commercial office space. We anticipate the flexible non-commercial uses as potentially including community, education, hotel and other compatible uses, whilst retaining a viable office function on the estate. We would encourage the GLA to ensure that the emerging OAPF is clear in its recognition of this vision.		None
	East India Dock	226	In respect of the existing character of the Blackwall and Leamouth area, the OAPF references a range of industrial uses still remaining in the area. We would suggest that the description of the area is amended to remove reference to an industrial character.	5.3	None
	East India Dock	227	Additionally in respect of the existing urban form, height and massing of the area, it is considered that the description of height is not accurate with residential buildings significantly exceeding the estimate of 30 storeys with New Providence Wharf rising to c.45 storeys	5.3	Actioned
	East India Dock	228	it is unclear what the supporting 'community hub' sought at East India comprises and whether this is consistent with emerging plans for the Republic. As set out previously, Republic seeks to reposition the existing office uses at East India Dock for the modern agile workforce of the future. This ambition involves creating the place and amenities which will sustain that workforce. Therefore, it is considered that this wording should reflect this ambition.	5.4 areas of change	Actioned
	East India Dock	229	Tall buildings should be permitted in appropriate locations throughout the character area, in line with the Tall Buildings Zone identified in the emerging Tower Hamlets Local Plan.	5.4	None

No	Respondent	No	Comment	Section / page	Action
	East India Dock	230	Implied demolition of Capstan House in order to extend the Import Square. As part of the Republic development, which is on site at present this building is currently being refurbished and extended delivering a new public realm scheme across the estate. This proposal is therefore not a practical proposition and should be deleted. Further new public realm can be delivered in other ways at Republic where intensification of footprint is encouraged	5.4.1.	Actioned
	East India Dock	231	We note that the high growth scenario assumes lower densities of development than current development trends. As has been made clear in many application decisions and in the recalibration of the Mayors own development policies around density, density itself is not at issue. High density enables the potential of sites to be optimised in line with the ambition of the OAPF. Where development is of a high quality, high densities should not be resisted. We therefore consider that a high growth (or presumably baseline) scenario, should not assume a continuation of current density trends but instead assume an increase in high density growth, underpinned by exemplar design.	1.3	None
	East India Dock	232	London is a changing place, and as the roles and the fabric of places evolve, so do building typologies. This is a natural process in city change. To 'fix' London would be to severely constrain its ability to accommodate growth and policies should therefore be designed to encourage and manage this growth whilst recognising that places can and will change over time. The flexibility should therefore be given to deliver development which contributes to the future of London as a global city.	1.3	None
	East India Dock	233	concerns remain over the total quantum of job generation remaining constant at 110,000 as identified in all three growth scenarios. Limiting the potential for job generation could reduce the flexibility of how people choose to live and work in Isle of Dogs and South Poplar in the future.	1.3	None
	East India Dock	234	the Canary Wharf tall buildings cluster should be extended to include the full area of the high rise building zone. Additionally, it is unclear what scale of building might come forward in the high and midrise areas. It should be noted that buildings of 60 storeys have been permitted in the midrise areas and should be made clear that the OAPF is not intended to be a brake on building heights or scheme densities where these might otherwise help to maximise delivery in line with the plan's ambition for growth. We suggest that the definition of such low rise areas could therefore be adjusted to read 'predominantly low rise' or similar.	3.2, housing strategy	None
	East India Dock	235	This approach is considered to be in conflict with draft London Plan policies which promote a proposed designed approach to determine the capacity of sites, rather than focussing on the connectivity of the site and the local context. Furthermore, the draft London Plan tall building policy notes the roll that tall buildings play in providing legibility, and that in some cases development will be at a scale that will enable them to define their own context.	5.3.4	Actioned
	East India Dock	236	consider that the East India Dock Estate is very much part of this context of large scale higher density urban buildings and where opportunities exist to intensify and optimise the development potential of the site through replacement rather than refurbishment of existing buildings, it is our view that taller buildings are an appropriate response to context	general comment	None
	East India Dock	237	Blackwall should also be identified as a suitable place to introduce a greater provision of local job opportunities as this chimes with the ambition for the estate. Republic has the capacity to create flexible work space at a range of sizes which combined with an increased provision of similar space could help generate a greater local knowledge economy for small start-ups, thus having a significant impact on the Isle of Dogs and South Poplar's wider economy. If an ambition to deliver a greater number of SMEs in Blackwall is to be included in the OAPF, the framework should recognise the benefits of introducing subsidised workspace. This would have substantial positive effects towards offering an alternative creative scene to Canary Wharf and Blackwall.	3.3	Actioned
	East India Dock	238	The OAPF recommends exploring opportunities to maximise links with local education providers whilst also encouraging the utilisation of empty sites to serve community needs as part of a good growth agenda. The Republic scheme epitomises these aspects of the Mayors position of good growth through its desire to deliver flexible workspace, educational and creative uses on a previously underutilised site.	3.4	None

No	Respondent	No	Comment	Section / page	Action
	East India Dock	239	However, it is our view that the opportunity created by Poplar High Street to create a substantive connection between Canary Wharf and Poplar and Blackwall is underplayed in the OAPF and that Poplar High Street is under performing as a centre. It is our view that Poplar High Street could benefit from a greater critical mass, increased identity and anchor uses if it is to become the hub of a creative village that effectively mixes those key elements identified earlier of 'work, live and play'.	4.1	None
	East India Dock	240	Fundamentally, in contrast to the methodology set out in 4.2, the Infrastructure Study undertaken should not be used to place a limit on the development potential in the OAPF if delivery is to be maximised. Rather, the infrastructure requirements of the 'maximum delivery' outcome should be established and planned for. This is a very different approach to plan making and one that would be more consistent with the stated ambition of the OAPF. Paragraph 4.2.1 notes that school provision forecasts are maximum (i.e. worst case) scenarios and therefore unlikely realistic case scenarios. To avoid overprovision and the suppression of other plan objectives, these forecasts should be replaced with ranges based on different likely demographic trends and a median outcome adopted. Indeed, it is unclear what allowances are to be made to secure provision of primary and secondary schools on allocated sites in the development management process and this should be explained in the text of the OAPF. Given the parallel need for homes and schools, the delivery of one should not be held up by the need to deliver the other.	repeated comments	None
	East India Dock	241	We note that Section 5.1 outlines the need for joined up growth across multiple land ownerships. Policies that create interdependencies between adjoining land owners need to be carefully drafted if they are not to delay development coming forwards. Policies that might start by looking at existing character areas as determinants of context also need to consider wider context, strategic ambition and emerging development in order to determine an appropriate form of development for a given site. Character areas should not prescribe scale and density, the delivery of which should be considered on a site by site basis. 6.2 Funding Recommendations It is noted that section 6.2 highlights the significant funding gap required to fund the enabling infrastructure which should be delivered in the first 5-10 years. Whilst it is recognised that CIL and S106 will provide some level of funding, the OAPF relies heavily on the further exploration of public funding sources. The lack of confirmed funding sources, calls into question the deliverability of the framework's aims and the effectiveness of the Framework. We therefore seek clarification with regards to the proposed funding streams.	repeated comments	None
17	Hondo Enterprises/Regal	242	Figure 1.3 should be updated to recognise the boundary of Site Allocation 19 (Development Management Plan, 2013) and Site Allocation 4.3 (Draft New Local Plan, 2018).	fig 1.3, p15	Actioned
	Hondo Enterprises/Regal	243	At Figure 2.2 the Site is identified to fall within the Crossharbour Key Centre where residential development is supported.	General	None
	Hondo Enterprises/Regal	244	OAPF states that a minimum of 35% of new dwellings are sought to be delivered as affordable. Whilst we note that the policy position seeks to deliver at least 35% both at a regional and local level, there should be flexibility on this quantum which is subject to viability testing. This is particularly crucial should, as the OAPF suggests, that developments are expected to provide extensive social and community infrastructure.	2.2, p28	Actioned
	Hondo Enterprises/Regal	245	We strongly support the identification of the Site for future development. However, we note that the Site is identified as a key proposed building frontage (Page 111) which extends across numerous land ownerships. Aspirations for large scale site assembly noted, the practicality of this is not always achievable and as such we consider that the proposed building frontages should not be included within the OAPF as these will inhibit flexibility of well-designed individual developments to be brought forward. Feasibility studies undertaken to date demonstrate that the Site can come forward independently of further site assembly. We note that the OAPF is a supporting document to the strategic policies set out within the London Plan. We also note that Paragraph 21 of the NPPF (2018) requires that strategic policies are limited to those necessary to address strategic priorities. In our opinion this should be limited to identifying areas as suitable for development as achieved through Figure 3.1.	p111, & fig 3.1	None

No	Respondent	No	Comment	Section / page	Action
	Hondo Enterprises/Regal	246	Cubitt Town is identified at Figure 3.2 for residential properties in a range of heights. It is noted that the LBTH draft New Local Plan identifies the Site within the Millwall Inner Dock (Isle of Dogs) Tall Building Zone. The Site is further identified as falling within an area for a secondary tall building cluster. We strongly support this designation & the identification of the Site at Figure 3.3 identifies the Site as a District Centre/Local Employment Hub.	3.2, 3.3 & housing strategy	None
	Hondo Enterprises/Regal	247	The Site sits within LBTH's Crossharbour Site Allocation 4.3 which refers to the area needing to provide a new primary school, community space, health centre and supermarket as well as new homes. We support LBTH's identified requirements for Site Allocation 4.3 and note that given that the new Local Plan is based on up to date evidence that the OAPF should seek to replicate what has been identified as required by LBTH and their preferred location for these uses. As noted, the Site sits within part of a wider allocation where significant social infrastructure is expected to deliver. The intention is for this Site to provide a residential-led development with supporting ancillary uses but not for education or large-scale retail uses.	part 4	None
	Hondo Enterprises/Regal	248	Significant level of detail provided. As noted previously, the purpose of this document is to set out the strategic objectives of the London Plan rather than provide onerous conditions for proposals. As such, we consider that the OAPF should seek solely to identify sites suitable for development. The responsibility for preparing detailed site allocations should sit with LBTH.	5.4.6	None
	Hondo Enterprises/Regal	249	Careful consideration to ensure that the creation of such working groups and the preparation of Growth Area masterplans does not potentially inhibit the ability for planning applications to be brought forward in a timely manner. Such initiatives must avoid becoming a further barrier to planning applications for good development being progressed.	5.5.1.	None
18	Greenland/Hertsmere London Ltd/Savills	250	<p>We write on behalf of Greenland Herts mere (London) Ltd ("Greenland") setting out both our support for the draft OAPF and our suggested amendments to it.</p> <p>The Greenland Group is a global property development group, appearing in the Fortune Global 500. It has experience of delivering high quality developments in cities across the world over four continents and in ten countries. These include New York, Los Angeles, San Francisco, Toronto, Singapore and Sydney. It is now committed to delivering this model to London and has successfully completed Phase 1 of its new development in Wandsworth, comprising 326 residential apartments and 35 commercial units.</p> <p>Greenland are the owner of the 2 Hertsmere Road site in Canary Wharf, which has a live consent for the residential led Spire London development which comprises 67 storeys, 861 homes, supporting amenity uses, flexible commercial space and new public realm.</p> <p>In the context of Greenland's current investment in the Isle of Dogs within the London Borough of Tower Hamlets ("LBTH") through the Spire London site, and in relation to any other sites which Greenland may seek to bring forward in the Isle of Dogs in the future, Greenland supports the aspiration of the OAPF to provide a framework for a part of London that, beyond any other, has transformed the City over the last three decades through a progressive and pro-growth approach to planning. We are of the view that any OAPF must continue to embrace this 'can do' approach in order to ensure that the Isle of Dogs continues to fulfil the opportunity that it creates for London.</p> <p>Whilst the OAPF acknowledges that London is growing and that the Isle of Dogs has a significant role to play in meeting this challenge, the Mayor should ensure that the banner of 'good growth' does not artificially limit the potential of this unique, central and accessible area. London has varying characteristics, some historic and some established more recently, and the diversity of the City ought to be capable of being celebrated in both its people and its places.</p> <p>The ambition of the OAPF should therefore focus on providing a framework that responds to community needs but that also maximises and facilitates the delivery of new development. Greenland are keen to ensure that the OAPF enables these twin objectives to be achieved without prioritising one over the other.</p>		None

No	Respondent	No	Comment	Section / page	Action
	Greenland/Hertsmere London Ltd/Savills	250	<p>2</p> <p>Representations to OAPF Consultation</p> <p>We set out below an Executive Summary highlighting Greenland's key suggested amendments to the draft OAPF in relation to Affordable Housing & Viability, Density, and the Requirement for multiple landowners to consider a comprehensive approach to development. Further detail is set out in the body of the representation.</p> <p>Executive Summary</p> <p>Affordable Housing & Viability</p> <p>Greenland note the aspiration of the OAPF to provide 35% affordable housing, but suggest that in line with other adopted and emerging regional and local policy, that the amount of affordable housing should be the 'maximum reasonable' in the context of viability and other considerations.</p> <p>Density</p> <p>We suggest that high density development optimises the potential of sites to deliver schemes which contribute to meeting the government demand for housing delivery. The draft new London Plan no longer contains the density matrix, and in its place promotes a design led approach to density, where higher densities proposed through high quality design would be considered acceptable. We therefore suggest that the draft OAPF should not assume a continuation of current density trends, but an increase in high density growth.</p> <p>Requirement for multiple landowners to consider a comprehensive approach to development</p> <p>The draft OAPF suggests the need for multiple land owners to consider a comprehensive approach to development and possibly even arrange working groups. This may not be practical where for example lease events do not align. Greenland suggest this approach is unrealistic in practice, and that the draft OAPF is amended to reflect a desire for parties to collaborate but makes clear that it is for the Council to ensure that each site that comes forward does so having due considerations to the cumulative impacts of that development.</p>		
	Greenland/Hertsmere London Ltd/Savills	250	<p>Part 1: Introduction</p> <p>We are supportive of the messages relating to the strategic growth of East London, and the specific growth opportunities provided by the Opportunity Area (OA), highlighted in Part 1 of the OAPF. Greenland have demonstrated their ongoing commitment to LBTH through undertaking extensive engagement with LBTH throughout the design and delivery process for Spire London, and support the OAPF's recognition that LBTH has an increasingly important role as a key borough for delivering London's growth.</p> <p>We welcome the recognition that despite high levels of growth in the area to date, there are still many further opportunities for growth within the OA. The recognition that this part of London has a key national role at the epicentre of London's growth, with baseline scope for 31,000 homes and 110,000 jobs, provides a clear foundation on which to build.</p> <p>Flexible Growth</p> <p>We welcome the focus of the OAPF on delivery and endorse the ambition to ensure that the emerging OAPF is flexible enough to respond positively to any number of different social-economic futures that might emerge, not least as the result of Britain's decision to end its membership of the European Union. However, it remains clear that the levels of population growth anticipated by the Mayor are such that the requirement for new homes and jobs will remain significant. So too, that the Isle of Dogs is an area with the capacity to sustainably accommodate this. The OAPF should ensure that a range of new homes and jobs are supported to meet the full range of need. Indeed, this is a sentiment echoed in the recent ministerial letter to the Mayor dated 27th July 2018. Both residential and commercial uses should be prioritised and dense development supported where proposals for either or both uses can meet their own impacts and are acceptable in townscape terms.</p>		

No	Respondent	No	Comment	Section / page	Action
	Greenland/Hertsmere London Ltd/Savills	250	<p>3</p> <p>Growth Scenarios</p> <p>We note that the high growth scenario, outlined in section 1.3, assumes lower densities of development than current development trends. As has been made clear in many application decisions and in the recalibration of the Mayor's own emerging development policies around density, density itself is not problematic. High density development optimises the potential of sites to deliver new development in line with the ambition of the OAPF and wider regional and local policy frameworks.</p> <p>Where development is of a high quality, high densities should not be resisted. Indeed, as one of the most prominent and best-connected clusters of tall buildings in London, the northern Isle of Dogs is arguably one of the most appropriate locations for such development to occur. We therefore consider that a high growth scenario, as is envisaged by the baseline assumptions in the draft OAPF, should not assume a continuation of current density trends but an increase in high density growth. The draft document should make this clear. It is also, notably, anticipated by the Borough and reflected in the extension of the Canary Wharf cluster in the draft Tall Buildings Zone designation contained within the emerging Tower Hamlets Local Plan.</p> <p>At 2.1, the OAPF begins to describe how 'good growth' will be delivered. In Part 3, an objective is included which seeks to balance the demand for housing with the demand for employment growth. Yet in all three growth scenarios the total quantum of job generation remains constant at 110,000. There is an implicit emphasis, therefore, on the provision of residential uses. Whilst this is not itself problematic, it should be stressed that not all sites will be appropriate for the delivery of housing or commercial space and each application should therefore be considered on its own merits.</p>		
	Greenland/Hertsmere London Ltd/Savills	250	<p>Part 2: The Plan – The Components of Good Growth</p> <p>We agree that a component of good growth is high quality place-making and design. However, it is notable that wider place-making and design is often the result of cumulative decisions. In areas such as the Isle of Dogs, many sites will accommodate tall buildings on sites which are constrained in terms of their site area. The ability for individual sites to offer extensive opportunities for public realm is therefore limited. The OAPF must recognise the extent to which each site can and cannot contribute to this through a single application for development. Requirements that create interdependencies between adjoining land owners therefore need to be carefully drafted to ensure they do not prevent or delay development coming forwards. High quality placemaking and design is capable of being delivered on individual sites whilst respecting any wider masterplan or delivery vehicle.</p> <p>The draft OAPF seeks to enhance the retail and service offer of town centres of Canary Wharf. The ambition to increase the vitality and viability of town centres is supported by Greenland, but we suggest that these services are brought forward in conjunction with the key uses they support, including residential.</p>		

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	Greenland/Hertsmere London Ltd/Savills	250	<p>Part 3: Opportunities for Good Growth</p> <p>We support the ambition to ensure that development allows opportunities for local people to access employment and homes. This principle is well established through the existing planning system. With regard to the residential sector, house prices for new and historic properties remain unaffordable for many, even a maximum growth scenario cannot deliver the volume of homes that London needs at the pace required. It should be stressed, therefore, that all new residential development will go some way to meeting the need of Londoners for homes. This should be clearly recognised and acknowledged.</p> <p>Housing Strategy</p> <p>We support the identification of a minimum target for housing delivery. The OAPF should make clear that delivery at levels in excess of this target will be positively encouraged. We also note the identification of a minimum target for 35% of these homes to be affordable (at paragraph 3.4.1), in keeping with the aspirations of the Mayor of London. However, to ensure consistency with national policy, the OAPF should make clear that the percentage arriving from development proposals will be the 'maximum reasonable' in the context of viability</p>		
	Greenland/Hertsmere London Ltd/Savills	250	<p>and other considerations. Delivery of new homes should not be delayed by unrealistic or inappropriate demands for affordable housing in the context of individual site viability.</p> <p>We support that in terms of housing mixes, the OAPF notes that family housing may be more appropriate in certain building typologies, and welcome site specific discussions to enable the delivery of the most appropriate mix for a site.</p> <p>In addition to the Affordable Housing targets, the location of affordable housing should be considered in the same context as the London Plan policies. Whilst there should be a preference for on-site provision noted in paragraph 3.4.3), the adopted plan for the Borough makes clear that there is a cascade of preference which can accept off site provision or payments in lieu. It is not the place of the OAPF to change or introduce new policy.</p> <p>Paragraph 3.4.3 states that development should be 'inclusive, mixed and well-designed schemes, which are tenure blind'. We support the ambition to ensure that the tenure of a building cannot be determined from its quality, but also recognise that where multiple buildings are brought forward on any given site, that these may need to be expressed differently for positive townscape reasons. Where the quality of the building is not diminished, it is our view that buildings of varying architectural styles should still be capable of meeting the tenure blind test.</p> <p>It is also unclear on what basis schemes might be required to over-provide communal amenity space (paragraph 3.4.4) and this should be deleted from the framework.</p>		
	Greenland/Hertsmere London Ltd/Savills	250	<p>Centres & Employment</p> <p>The Spire London site is located within CAZ: Category B equivalent in the draft OAPF. The OAPF notes that development in CAZ A will maintain existing employment floorspace, CAZ B will be employment-led mixed use, transitioning to the surrounding residential context as shown in the diagram below from p 93 of the OAPF.</p> <p>As the Spire London site already has a current planning permission for a residential led scheme, we suggest that additional flexibility is considered in the wording of the OAPF to encourage a wider variety of development to come forward, especially in relation to the new Crossrail station which will improve the local connectivity of the area and therefore increase the scope for the area to accommodate a greater quantum of development.</p> <p>In the draft London Plan, Canary Wharf has been upgraded to a Metropolitan Centre. Draft London Plan Policy SD7 (Town Centre Network) notes that Metropolitan Centres should be the focus for the majority of higher order comparison goods retailing, whilst securing opportunities for higher density employment, leisure and residential development in a high quality environment.</p> <p>As such the OAPF should acknowledge the wider range of uses appropriate to a thriving town centre at Canary Wharf, including residential.</p>		

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	Greenland/Hertsmere London Ltd/Savills	250	<p>Part 4: Supporting Growth with Infrastructure</p> <p>The Development Infrastructure Funding Study (DIFS) assessment identifies significant infrastructure requirements in relation to cycling and pedestrian network improvements. Where the delivery of this infrastructure cannot be sustainably delivered by a tax on development profit alone, the Government, Mayor and Borough should be invited to subsidise development that delivers the highest densities of homes and jobs with allocated grant funding. The OAPF should set out how such funding might be accessed by the development industry, or at least how it envisages it may be accessed.</p> <p>We support the coordination of development proposals to ensure that sites enable rather than prejudice the delivery of planned routes, places and spaces but caution against the rigid requirement to bring sites forward together or for the delivery of specific proposals and the benefits flowing from each to be delayed through an overly prescriptive strategy around the delivery of infrastructure.</p>		
	Greenland/Hertsmere London Ltd/Savills	250	<p>Social & Community Infrastructure</p> <p>We recognise the acceptance that infrastructure requirements are liable to fluctuate due to demographic and economic factors. As such, the OAPF envisages that requirements will be reviewed every 5 years. In addition, locations for such provision are described as indicative and subject to change. Clarity on the initially proposed locations should be provided as at present this section of the OAPF is too generalised and fails to provide certainty on the approach proposed.</p> <p>The uncertainty within the current draft should not result in development being artificially held back whilst infrastructure requirements are reviewed and re-reviewed. Fundamentally, in contrast to the methodology set out in 4.2, the Infrastructure Study undertaken should not be used to place a limit on the development potential in the OA if delivery is to be optimised. Instead, the infrastructure requirements of the 'maximum delivery' outcome should be established and planned for. With this as a target for infrastructure provision the baseline growth scenarios can be exceeded without risk of negatively impacting the existing and future community of the Isle of Dogs. Whilst a different approach to plan-making, this would be more consistent with the stated ambition of the OAPF.</p>		
	Greenland/Hertsmere London Ltd/Savills	250	<p>Placemaking & Design</p> <p>Within this section of the OAPF, specific reference is made to the objective to seek to celebrate an areas unique character. Clearly, this approach is laudable, but can often be cited as a reason to control or restrict change. Clarity is therefore required to demonstrate how the ambition to maximise the potential for delivery set out at the head of the OAPF can be achieved in this context</p> <p>Part 5: Public Realm and Urban Design</p> <p>Policies that might start by looking at existing character areas as determinants of context need to consider wider context, strategic ambition and emerging development in order to determine an appropriate form of development for a given site. Character areas should not prescribe scale and density, the delivery of which should be considered on a site by site basis, in keeping with the emerging draft London Plan.</p> <p>From a usability perspective, we note that it could be confusing to define one set of character areas in Figure 3.2 and another in 5.1. It is considered that consistency would be beneficial.</p> <p>Spire London lies within the Existing Character Area of Canary Wharf, and the Canary Riverside Area for Change.</p> <p>Existing Character: Canary Wharf</p> <p>The draft OAPF identifies Canary Wharf as a global business district and one of the UK's two main financial centres. It refers to the Wood Wharf area to the east as an emerging neighbourhood with a different character, bringing forward office, residential and community uses. We note that other fringe zones also have a different blend of uses within them, specifically West India Dock which includes hotels, a cinema, restaurants and bars, work spaces, and residential accommodation</p>		

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	Greenland/Hertsmere London Ltd/Savills	250	<p>Canary Riverside Area for Change</p> <p>The Spire London site is noted as a 'key proposed building frontage' at the western end of North Dock. Greenland support the draft OAPF's aspiration of 'enhancing access to and environmental quality of the docks to maximise the amenity potential of the water space and improve legibility between the river and the docks.'</p> <p>The Canary Riverside Area for Change primarily focuses on the River Thames frontage. Greenland support the draft OAPF's ambition that 'at the fringe of the strategic employment area, uses will begin to diversify to knit back in to the surrounding communities', but suggest that reference to 'future uses creating a smooth transition from the residential uses to the south to the employment uses to the north and east' is amended to include reference to the mixed use nature of the north and east, including residential uses coming forward.</p> <p>Implementing the Components of Good Design</p> <p>For consistency, the diagram in Section 5.5 should include the Spire London site as a permitted site, in line with the rest of the draft OAPF. Section 5.5 continues to re-emphasise the need for multiple land owners to consider a comprehensive approach to development and possibly even arrange working groups. This approach appears wholly unrealistic and a potential impediment to growth as discussed in this representation. Whilst it is agreed that any new development would need to demonstrate how it sits into a wider masterplan or site allocation, seeking to arrange working groups for parties to share extremely sensitive commercial information is an ill-conceived approach to a plan which promotes extensive development. We suggest this element of the guidance is amended to reflect a desire for parties to collaborate but makes clear that it is for the LPA to ensure that each site that comes forward does so having due consideration to the cumulative impacts of that development.</p>		
	Greenland/Hertsmere London Ltd/Savills	250	<p>Part 6: Delivery and Monitoring</p> <p>Funding Recommendations</p> <p>It is noted that section 6.2 highlights the significant funding gap required to fund the enabling infrastructure which should be delivered in the first 5-10 years. Whilst it is recognised that CIL and S106 will provide some level of funding, the OAPF relies heavily on the further exploration of public funding sources. The lack of confirmed funding sources calls into question the deliverability of the framework's aims and the effectiveness of the Framework. We therefore seek clarification with regards to the proposed funding streams.</p> <p>Next Steps</p> <p>We trust these representations are clear and would be pleased to clarify or provide further information on any element as appropriate. We would likewise welcome a broader dialogue with officers to ensure that the potential for change in the Isle of Dog is captured in the emerging OAPF.</p>		

No	Respondent	No	Comment	Section / page	Action
19	Rockwell/Savills	251	<p>Rockwell is pleased to engage with the Mayor's emerging draft Isle of Dogs and South Poplar Opportunity Area Planning Framework (hereafter "OAPF") and also the draft Isle of Dogs and South Poplar OAPF Transport Strategy. This submission, made on behalf of Rockwell to the Mayor of London, sets out both our support for the draft OAPF and our suggested amendments to it. It also flags our broad support and specific concerns associated with the Transport Strategy alongside the clarifications which we consider necessary. Our responses to each document are set out under separate headings.</p> <p>Rockwell Property is a developer with a track record delivering high-quality developments in the Isle of Dogs (hereafter "IoD") and continues to invest in the area. Rockwell supports the aspiration of the OAPF to provide a framework for a part of a London that, beyond any other, has transformed the fortunes of our City over the last three decades through a progressive and pro-growth approach to planning. It is of the view that any OAPF must continue to embrace this 'can do' approach in order to ensure that the IoD continues to fulfil the opportunity that it creates for London.</p> <p>Whilst the OAPF and Transport Strategy acknowledge that London is growing, and that the IoD has a significant role to play in meeting this challenge, the Mayor should ensure that the banner of 'good growth' does not artificially limit the potential of this unique, central and accessible area. Whilst setting out what a fantastic part of London this could become, for example, many of the infrastructure improvements do not appear to have undergone a specific 'need' testing. The OAPF and Transport Strategy should therefore focus on providing a framework that responds fully to community but maximises and facilitates the delivery new development. Accordingly, Rockwell is eager to ensure that the framework and strategy enables these twin objectives to be achieved without prioritising one over the other. Representations to OAPF Consultation</p> <p>Part 1: Introduction</p> <p>We are supportive of the messages relating to the strategic growth of East London and the specific growth opportunities provided by the Opportunity Area, highlighted in Part 1. We welcome the recognition that despite high levels of growth in the area to date, there are still many further opportunities for growth within the OA. The recognition that this part of London has a key national role at the epicentre of London's growth, with baseline scope for 31,000 homes and 110,000 jobs, provides a clear foundation from which everything else should flow.</p> <p>Barriers to Growth</p> <p>The preparation of an OAPF provides an opportunity to plan positively for the future and improve connections throughout the Opportunity Area (OA). There is clear scope to extend the amount and intensity of development southwards and northwards from Canary Wharf. To an extent, this is already in</p>		Actioned
20	Klein's Wharf	252	<p>We note that the draft OAPF identifies our site at 122/126 Westferry Road E14 3SG, as a 'future potential site'. There is no detail to explain what this designation means. We own the site and operate our business there. We have not yet made any decision regarding its future. We would however support a designation to allow a change in the future but would require this to be discussed with us before this is progressed any further.</p>		Actioned
21	Robert Indescon Developments/White Young Green	253	<p>By way of background, the site at Greenwich View Place (hereafter 'the Site') is a business centre comprising seven buildings with five 2-3 storey data centres and two 8 & 9 storey, 1990s office buildings. The Site is positioned on the dockside of Millwall Outer Dock in the Isle of Dogs. The Site and surrounding area has long been identified for regeneration by the London Borough of Tower Hamlets ('LBTH'). Surrounding sites are at various stages of development, including the neighbouring Westferry Printworks.</p>	context of site	None

No	Respondent	No	Comment	Section / page	Action
	ROIDS owns the long leasehold interest of Greenwich View Place, a large site within the proposed Opportunity Area (site plan appended). ROIDS is a key landowner in the area and have successfully brought forward high-quality regeneration projects on other sites in the OAPF area.	254	<p>The adopted LBTH policies map (2013) identifies the site as within the Millennium Quarter Site Allocation (No. 17). The LBTH Managing Development Document sets out a high-level vision for the site allocation including mixed-use development, strategic housing development and a district heating facility (where possible). Other compatible uses are also encouraged including commercial floorspace and open space. The site allocation ('4.7 Millharbour South') for mixed use development has been brought across into the LBTH Regulation 19 Local Plan which has been submitted for Examination in Public. The draft LBTH Local Plan also identifies the Site as within the Millwall Inner Dock tall building zone designation where tall buildings (>30m) will be directed (draft policy D.DH6). The site therefore is ideally located for mixed use regeneration and has been identified consistently in local plan and regional policy for high-density, comprehensive redevelopment.</p> <p>The OAPF identifies the Site as within a future potential site for growth (Figure 3.1 OAPF), supporting the delivery of at least 31,000 homes and 110,000 jobs across the whole OAPF area. The housing strategy for the OAPF also shows the Site as within a 'Secondary tall building cluster' (Figure 3.2). The OAPF emerging vision diagram for the 'Millwall Waterfront' area (section 5.4.5) shows the northern end of Greenwich View Place as 'key proposed building frontage'. However, a large area of the Site comprising the southern end overlooking the docks is shown as a new Outer Dock Park. The supporting text states: "Development on the Greenwich View sites should enlarge the proposed open space on Westferry printworks to create a local waterfront park." It is noted that the provision of a new park in this location is also included in the submission version of the draft LBTH Local Plan. ROIDS will conduct separate discussions with LBTH.</p>	5.4.5	Actioned
	RIOD	255	<p>The vision of the OAPF to transform the area and accommodate a high level of growth and economic activity is strongly supported. The demand for additional open space in the area has been established, most recently in the LBTH Open Space Strategy 2017, the findings of which were incorporated into the draft Local Plan. Due to the existing deficiency, it is understood that new development will not be permitted to rely on nearby public open space. The provision of open space as part of development proposals is therefore cemented in existing local policies and is strongly supported. However, quantum and location of such open space as specified in the OAPF are not justified at Greenwich View Place and if upheld strictly will blight the potential for development on this Site.</p>	5.4.5	None
	RIOD	256	<p>The Site of the proposed park is currently occupied by a large 8 to 9 storey, 210,000 sq ft office building and a 30,000 sq ft data centre. While the Site is occupied by a profitable office building and data centre this appears directly in conflict with the prospect of it ever becoming a public park. To identify a third of this Site Allocation as open space will therefore limit – potentially prohibit – the delivery of employment space and housing in the future for the wider site allocation. The allocation would disincentivise the 5 under-lessees and the head leaseholder from ever bringing their parts of the Site forward for redevelopment in the future</p> <p>The justification for the size and location of open space allocation is unclear. While it is recognised that new open space should come forward with development, the quantum has not been linked to any measure of demand or likely scale of development to come forward.</p>	5.4.5	None
	RIOD	257	<p>The specific location of the park on what is potentially the highest value area of this Site in this key location at the southern end of Isle of Dogs (ie. a waterfront location on the bend of Millwall Inner and Outer Docks) has also not been justified. Notwithstanding this, an aspiration to connect any open space with that to be created as part of the Westferry Printworks open space is acknowledged and supported. However, the new 'East Park' at Westferry Printworks is located to the north west of the proposed Outer Dock Park – and therefore does not link directly to this Site. A position to the north of this would create a park that would effectively be an expansion to East Park, rather than the current proposal which would create a dislocated open space. It should also be noted that the size of East Park will be significantly reduced under the revised scheme for Westferry Printworks, where the landowner has suggested within their recent community engagement exercise a desire to bring forward plans for a new 32-storey tower.</p>	5.4.5	None

No	Respondent	No	Comment	Section / page	Action
	RIOD	258	<p>the location within a site allocation and identified regeneration area in the context of policies directing increasing heights (as appropriate) and densities does not support the allocation of this particular site as a large open space. There is therefore inconsistency between the proposal to create the new park and wider strategic policies for the area.</p> <p>We would therefore recommend that the identified open space be given a less prescriptive quantum and location. Without such amendments, the Isle of Dogs and South Poplar OAPF as proposed is not sound when judged against the core tests of soundness set out in the revised NPPF (paragraph 35), for the following reasons:</p> <ul style="list-style-type: none"> • The Plan is not positively prepared, as the quantum and location of the proposed new park is not justified by objectively assessed infrastructure requirements and undermines the identified need for housing and commercial development in this location. • The Plan is inconsistent with the NPPF and will prohibit the delivery of development in what is recognised as a suitable, sustainable location for growth. 	SUMMARY 5.4.5	None
22	Cllr Candida Ronald Ward Councillor for Blackwall & Cubitt Town. This representation is not related to my cabinet responsibilities nor is it on behalf of the Cabinet	259	<p>1. There are some things in the OAPF which are welcome and others which are less so. It identifies some of the challenges we face but doesn't address the key issue of how to manage conflicting development pressures on an area which is already home to a large and thriving population. I have particular concerns about design, preservation of green & blue open space, the infrastructure funding gap and sustainability.</p>	general comment	None
	Cllr Candida Ronald	260	<p>2. The development of the Isle of Dogs offered an amazing opportunity to be inspired by a unique water-filled landscape. Up to now, a range of planners have failed to rise to this opportunity and we have piecemeal development on the Island which does little to respond imaginatively to its physical assets. I cannot think of another dockside regeneration which has been executed so poorly. Future generations will look at the Isle of Dogs and wonder at our dismal choices. I am not convinced that the OAPF is going to improve matters.</p>	general comment	None
	Cllr Candida Ronald	261	<p>3. I absolutely support the focus on making the most of our water, enhancing views over it, preserving access to it, and recognising its importance as precious public realm rather than a feature to be viewed from high rise luxury towers.</p>	supportive comment	None
	Cllr Candida Ronald	262	<p>4. I also welcome the identification of our community assets – Mudchute, Millwall Park, Island Gardens, East India Dock basin, John McDougall Park, St John's Park – as spaces which need protection and enhancement.</p>	supportive comment	None
	Cllr Candida Ronald	263	<p>5. However the OAPF does not set out how these precious green and blue assets will be protected in the face of developments which seek to hedge them about and build right up to their perimeters (Asda development) or adversely affect the wind required for sailing in the docks (Westferry Printworks). There is a huge gap between the conflicting demands of development/developer profit and the need for open space. The document offers no answers on how this tension will be resolved.</p>	4.3 & throughout	Actioned
	Cllr Candida Ronald	264	<p>6. We already see developers coming forward with unpalatable plans, citing the OAPF as their justification for increased numbers and reduced green space (Westferry printworks and its vertical "playspace"). There is little acknowledgement in the document of the need to protect the abundant wildlife with whom we share the locality. The accompanying HRA report does not address the impact of surface water run-off on our local eco-system.</p>	HRA	None
	Cllr Candida Ronald	265	<p>7. The section in the report on funding causes concern – the financial assumptions are sketchy and the economic impact of Brexit has not been accounted for. There is a conflict between the need for developments to deliver funding for infrastructure and a requirement for 35% social housing, which I support. The document offers no answers on how this conflict will be mediated and prioritised.</p>	6.2	Actioned

No	Respondent	No	Comment	Section / page	Action
	Cllr Candida Ronald	266	8. The funding section implies that every pound of potential available GLA funding will come to the OA, while acknowledging this is unlikely. It is entirely possible, even probable, that the identified funding gap will be much larger & pressure will be brought to bear on LBTH to approve unsuitable developments on the grounds of money. How does the GLA intend to ensure that the required funding is in when needed and that "flexibility" is more than a word on a page? Much greater clarity is needed on this matter.	6.2	Actioned
	Cllr Candida Ronald	267	9. I would point out that we did not ask the GLA to designate the Isle of Dogs and South Poplar as an OA and it's a bit rich for the GLA to cast its eyes on the borough's funding streams eg Business Rates Retention, which will be needed for service provision across the borough. The funding gap calls into question the suitability of using a process designed for brown field sites for a densely populated area like the IoD and South Poplar. The document talks about the need for flexibility in the face of changing circumstances but the reality is that ever greater developments are being delivered while the infrastructure gap continues to grow and the only people being "flexible" are the residents whose lives are being adversely impacted. There is certainly no sign of development "go-slow" while the financing for infrastructure is still uncertain.	6.2	None
	Cllr Candida Ronald	268	10. Another area of concern relates to design. The document is notably silent on the unimpressive design of some of the buildings which have already landed amongst us, for example, the Madison, Lincoln Plaza (winner of the Carbuncle Cup) and the Liberty which is a dull, stolid, generic building in an unsuitable location.	Part 5	None

No	Respondent	No	Comment	Section / page	Action
	Cllr Candida Ronald	269	11. The examples used throughout the OAPF document of “precedents,” which might influence design in particular areas bear no relationship to what is happening on the ground and strike me as fantastical and potentially misleading. The initial legibility of the cluster at Canary Wharf is disappearing behind a wall of unimpressive, second-rate monoliths and a series of “cliff edges”, particularly east to west, are beginning to emerge. This is not a cityscape of which anyone should be proud and the document offers no practical guidance to rectify this.	Part 5	None
	Cllr Candida Ronald	270	12. It would be useful for the document to set out what powers the GLA has to enforce good design, explain who gets to choose the architectural character of any given area and what is the status of these “precedents” in planning decisions. Greater clarity is needed.	Part 5	None
	Cllr Candida Ronald	271	11. The document talks about “good growth” but what that means is open to interpretation. Yes, we desperately need more social housing in the area but residents are crying out for low-rise homes, near to the ground with good play space. That is not what is being delivered currently on the Isle of Dogs. How will this conflict be mediated and resolved? It would be helpful for the GLA to address this issue which is pertinent to other parts of our city.	general comment	Actioned
	Cllr Candida Ronald	272	13. My final concern is about what happens to the spaces in-between the nominated “areas of change”, for example between Blackwall and South Poplar, between South Quay, Crossharbour + Millwall, and Selsdon Way, south of Pepper Street. Developers on the IoD love a vacuum and transitions between nominated areas need to be addressed.	figure 3.1	None
	Cllr Candida Ronald	273	15. “ <i>challenging physical characteristics</i> ” – this defines the area in terms of “challenge” rather than acknowledging the extraordinary canvass we are dealing with. In my opinion it should be viewed through the prism of an opportunity to do something fabulous.	p8, fig 1.3	None
	Cllr Candida Ronald	274	16. <i>Protect and enhance community and heritage assets such as Mudchute Farm, Sailing Club and the dockside character</i> – this is welcome but Mudchute and the Sailing Club are under threat from the developments at Asda and Westferry Printworks. The document needs to set out how they will be protected, enhanced and prioritised.	fig 1.3	None
	Cllr Candida Ronald	275	17. <i>additional jobs = 110k</i> – what are these jobs and where are they situated? The figures are presented as three growth scenarios but the jobs figure is the same in each scenario. They don’t tally with the London Labour Market Projections 2017. A more logical approach would be to model three different scenarios as has been done with the housing numbers, acknowledging that 110k is likely to be maximum growth.	p9 jobs figures	None
	Cllr Candida Ronald	276	18. <i>Centres & employment</i> – what modelling has been done in response to the Brexit challenges and relocation of several large tenants away from Canary Wharf? More up-to-date information needs to be provided.	p19	None
	Cllr Candida Ronald	277	19. Direct discharge to the docks. The dock water is brackish; this policy risks damage to the current eco-system. This is not protecting our assets but exploiting and harming them. This idea needs to be nipped in the bud; developers are already picking up on it. I can’t find any reference to an assessment of what impact such a policy would have on the sustainability of wildlife.	p31	Actioned

No	Respondent	No	Comment	Section / page	Action
	Cllr Candida Ronald	278	20. Page 46 – I'm delighted to read that East India Dock Basin is to see public realm improvements. I assume the Lee Valley Strategic Park which includes the Basin will be responsible for funding this but there is no mention of them in the funding recommendations. Why is this?	p46	None
	Cllr Candida Ronald	279	21. North Greenwich river crossing –a Thames Clipper stop is needed on the eastern side of the Isle of Dogs but there is little public rationale for it at the Blackwall site identified in the document. It should be further south nearer to Wood Wharf. There is a strong suspicion amongst residents that the reason this location has been chosen is for the benefit of the Radisson Hotel and its guests wishing to go to the O2. It is concerning that economic considerations appear to have been prioritised over the transport needs for the area. This doesn't fill one with confidence about how infrastructure decisions will be made in the wider OA.		None
	Cllr Candida Ronald	280	22. Marsh Wall will be a lively new urban community hub with local shops colonising the underline space. Currently there are very few retail outlets which survive at the bottom of the enormous towers being built on the Island. Developers offer them, no-one can afford them and they are swiftly converted to residential (cf Arena Tower planning application). How will the OAPF ensure these are affordable, can compete with the Canary Wharf offer, and are local? Further evidence is required.		None
	Cllr Candida Ronald	281	23. Developments will collaborate across site boundaries to create a continuous network of public realm and open spaces cf Skylines application where the proposed green space is on the southern end of the site instead of meeting with the green space at the Madison to the north. There is hardscaping proposed for the northern end of Skylines but we need green space to soften the environment, not more concrete. How will this aspiration be enforced?		None
	Cllr Candida Ronald	282	24. Page 52 <i>Limeharbour park</i> – where is this? There aren't currently two spaces where parks could align on both sides of Millwall Dock. What is the status of this aspiration? Is it enforceable in planning terms?	p52	None
	Cllr Candida Ronald	283	25. Page 53 – how will the Docklands sailing centre be protected from the adverse impact of Westferry printworks? More detail is required.	p53	None

No	Respondent	No	Comment	Section / page	Action
	Cllr Candida Ronald	284	26. Page 55 <i>development will negotiate the change in scale between Island Gardens and South Quay</i> . How? Arena Tower, Westferry Printworks and the Liberty which are already in conflict with this ambition. What does “negotiate the change in scale” mean in practical terms which are enforceable in planning guidance?	p55	None
	Cllr Candida Ronald	285	27. Page 59 – <i>funding gap of £162m-£197m...first five years will be crucial</i> . Given the current state of London’s property market what is the probability of coming anywhere close to these numbers? More up-to-date information is required.	comment	None
	Cllr Candida Ronald	289	28. I welcome the identification of issues of housing management particularly in regard to high rise buildings and their insurance, fire safety procedures, and management of play space and communal areas. What powers do the GLA have in monitoring and enforcing housing management plans? More detail is required.	p61	None
	Cllr Candida Ronald	291	29. <i>Refresh</i> – I would argue that economic circumstances in the local area have already changed since this document was drafted last year and updated employment studies are required now.	comment	None
	Cllr Candida Ronald	294	30. Page 63 TFL business plan. What happens if the bid for funding is not successful?		None
	Cllr Candida Ronald	296	31. Assumptions around CIL, business rate retention, new homes bonus – these are matters for LBTH and there is no guarantee that the Council will choose to push all its investment into this area. What is the likelihood of the funding being available and if it isn’t who pays for the infrastructure? More evidence is required.	comment	None
	Cllr Candida Ronald	299	32. In summation, I welcome the document’s focus on green and blue space and its ambition to make sense of a disparate number of poorly executed developments across the piece. The identification of required infrastructure is also useful in helping residents to understand what they should be expecting and campaigning for.	supportive comment	None
	Cllr Candida Ronald	301	33. My major concern is the difference between the lofty aspirations set out in the document and the reality on the ground. Developers are already citing the OAPF growth scenarios as a reason to increase mass and scale of planning applications, with a cursory nod to infrastructure provision and increased pressure on green and blue space. I do not believe that this will deliver a cityscape worthy of its setting but will rather encourage more of the incoherent muddle that is being built out.	general comment	None
23	Alpha Grove	304			
	Alpha Grove Freeholders Association (AGFA), an umbrella group for the Freeholders on the Barkentine Estate who are also known as the “Cottages” and hereof, “AGFA” on the Barkantine Estate on the Isle of Dogs (IoD)	306	AGFA welcome the exclusion of the main four social Estates and specially the Barkantine Estate, on the Isle of Dogs where we fall under. From the areas set out the OAPF as areas for opportunities for growth on the Isle of Dogs. Even though we are excluded, yet we remain vulnerable as the local Housing Association can and are trying to demolish homes like ours to build upwards and their argument is that they are catering towards the London’s unrealistic target of 70,000 homes by 2041	general comment-support exclusion of estates	None
	Alpha Grove	309	The baseline growth scenario of 31,000 new homes is not acceptable within a small space as the Isle of Dogs; as the infrastructure of the Isle of Dogs cannot cope with the existing residents and businesses. We appreciate that the proposed 31,000 new homes target includes the 19,500 new homes already permitted with full plans by Tower Hamlets Council; however as local residents we really struggle with the current infrastructure, and any further growth without delivering the infrastructure will have a negative impact on the lives of the existing residents of all types of residents living on the IoD and specially the social housing estates such as ours	general comment - concern baseline scenario	None

No	Respondent	No	Comment	Section / page	Action
	Alpha Grove	310	The plan fails to encourage the ethos of a "family home" and only encourage flats and then not enough family sized flats either. It only encourages numbers and front doors but not quality family homes. If this plan is published we will end up with concrete jungle of flats and that cannot be a good thing. London is known for its family oriented homes with gardens; which ensure quality life. But unfortunately this plan encourages the demolition of such good houses with gardens to make way for high rise block of flats. This certainly cannot be a good thing. The plan should have clause to save houses with gardens where possible and it fails to build new and protect the current family sized houses with gardens	general comment - concern lack of family housing	Actioned
	Alpha Grove	311	This plan also fails to address the need of local shops and businesses; the current layout of our estates clearly encourages the "Corner shops" to carry on with their businesses and ensures a competitive market for the consumers in the area. New block of flats only provides one Tesco or a chain alike, thus creating a monopoly of price hikes; which does not help the residents that end up living in these future regenerated estates. There is no policy to protect current small businesses but encourage large giant corporations to monopolise on the vulnerable residents that will eventually live in these future blocks	centres & employment	Actioned
	Alpha Grove	312	The plan does to ensure that we the current residents and specially Freehold Land owners to truly be part of the regeneration by way of joint venture or ensure a like for like scheme; where residents like us and the leaseholders can be truly compensated. Only a like for like or in some cases a joint venture can truly compensate the residents that are already living on the Estate	general comment leaseholder compensation	None
	Alpha Grove	313	This plan does not encourage landlords such as the AGFA to create community land trust and try to build themselves; something this plan needs to explore prior to finalising the plan This plan also needs to have policies on how private landlords such as AGFA can build themselves and open up to social renting. Not just rely on the council and housing associations only. In modern day Inner London Private Landlords such as AGFA can still build three houses on the existing land with one house; thus provide at least 33.33% of the built houses to social (or affordable) housing. But cannot do it without the policy and political help that it needs. This kind of policy needs to be developed at this stage. The only thing groups such as AGFA needs are a London wide policy. And you would not need to provide any financial help to gain these additional homes; you just simply need to introduce a policy within this plan. This type of houses will have minimal impact on the current infrastructure, yet can deliver a significant number of homes towards the OAPF' ambitious housing target	general comment	None
24	TfL Commercial development	314	TfL CD broadly supports the contents of the draft OAPF. It is welcome that the documents identifies that agree that on the key drivers for achieving this is to "overcome the physical barriers of the DLR tracks and Aspen Way, through proposals for better connections and supporting the delivery of this improved physical infrastructure". the TfL DLR depot and surrounding land between Aspen Way and Poplar High Street as a key development opportunity.	p13	None
	TfL Commercial development	315	The development of the TfL DLR depot site which lies between Aspen Way and Poplar High Street is the only way that this severance can be overcome and the employment centre of Canary Wharf can be physically linked with the rest of the borough. The development of this site will require the provision of significant infrastructure in order to be deliverable, including decking over an expanded depot to ensure it remains operational into the future and providing bridge links over Aspen Way to link Poplar to Canary Wharf – a key strategic objective for Tower Hamlets and the GLA. TfL CD is currently preparing development proposals to provide the necessary infrastructure on the site and along with a significant quantum of development to help fund its delivery.	general comment - support	None
	TfL Commercial development	316	Aspen Way site allocation (which includes the DLR Depot) is not included on the diagram. The draft Tower Hamlets Local Plan recognises this site as the best opportunity to overcome severance caused by both the DLR and Aspen Way. As both a LBTH site allocation and the key site which presents the only opportunity to link South Poplar and Canary Wharf (recognised by the arrows within the diagram), this site should be included within the OAPF diagram.	p15	Actioned

No	Respondent	No	Comment	Section / page	Action
	TfL Commercial development	317	The DLR depot site will have a PTAL rating of 6A and development can be optimised on this site providing a significant contribution to meeting housing targets within the Opportunity Area. P35 partially identifies the DLR depot site as being suitable for predominantly high rise mixed use development. Extending the area in this diagram to include the entire TfL depot as being suitable for predominantly high rise, mixed-use development, would increase certainty and likelihood of optimisation of housing on the site. Development on the site will need to be placed on top of a deck covering the expanded DLR depot. The deck required to house the re-provided depot would be at least as tall as the 3-6 storey apartment blocks which characterise South Poplar to the north of the site. The OAPF should recognise that any development taking place on the TfL depot site will need to be significantly taller than the existing built form to the north of the site.	p35	None
	TfL Commercial development	318	this section could better recognise the essential role that an expanded depot will play in increasing capacity of the DLR in the future which will improve transport and movement in the wider borough and beyond. The depot will house the new rolling stock for the DLR going forward. Any deck provided will need to be over the top of a re-provided and upgraded depot with a transfer slab to ensure it is capable of withstanding residential development meaning that the deck and bridge link will be similar in height to the buildings surrounding the north of the site.	p47	Actioned
	TfL Commercial development	319	It is welcome that the OAPF recognises that the development of the depot site/Aspen Way Tower Hamlets Site Allocation can provide "a new attractive and vibrant place within the area." Given the extraordinary costs of development infrastructure (recognised in the costs of providing bridging and decking infrastructure and open space on the site) a significant quantum of development will be required to fund this infrastructure and this will have to be in the form tall buildings. The OAPF should recognise this within this section of the document.		None
	TfL Commercial development	320	The OAPF does not currently identify the redevelopment of the DLR depot in the 'key opportunities' section of this page. This site is allocated as one the main parcels of land in the draft Tower Hamlets Local Plan and the development of this site is the key opportunity to "address the severance of Aspen way and the DLR tracks improving access to Crossrail." To fund the essential infrastructure to overcome severance, high quality development in the form of tall buildings will be required on this site which will create a new attractive and vibrant place within the area with its own character. The development of this site should be referenced within this section as a key opportunity.	5.3.1 p73	Actioned
	TfL Commercial development	321	It is welcome that the OAPF and OAPF local connections study recognise that there is an opportunity to improve links across Aspen Way and create a new gateway to the Docklands. The development of the DLR depot site will be key in improving these transport links and creating the "urban village" which "contrasts and but complements the characters and function of Canary Wharf and South Poplar." Development on the site will need to be placed on top of a deck covering the reprovided DLR depot. The deck required to house the depot would be at least as tall as the 3-6 storey apartment blocks which characterise South Poplar to the north. The OAPF should recognise that any development taking place on the Poplar Site will be significantly taller than the built form to the north of the site.	5.4.2 p93	None
	TfL Commercial development	322	The diagram under the title "Character and urban form in building heights to Canary Wharf" could be clarified and improved. No reference to location is made and whilst it can be assumed that the diagram establishes the suitability of tall buildings on the DLR depot site adjacent to Aspen Way, we suggest that this can be confirmed more explicitly in the document. However, there is no mention of the challenging level changes of approximately ten metres on the site or the need to expand the existing DLR to ensure a future increase in capacity for DLR line. Development will need to take place on top of the deck and this will make even the ground floors of new development significantly taller than the 3-6 storey apartment blocks which characterise South Poplar to the north of the site. Diagrams and text should be altered to reflect this. TfL CD agrees with the OAPF that it is essential to provide a deck and bridge links to overcome the issue of severance. TfL CD is working up a development scheme on the DLR depot site which will enable the provision of a pedestrian and cycle bridge to link South Poplar with Canary Wharf. South Poplar. However, to fund the provision of such complex infrastructure, a significant quantum of development will be required in the form of tall buildings.	5.3.1 p73	None

No	Respondent	No	Comment	Section / page	Action
	TfL Commercial development	323	Point 3 (Workhouse Pocket Park and Link) states that a direct route and line-of-site from Poplar High Street to Canary Wharf of at least 15m width should be accommodated as part of any development scheme. While TfL CD agrees that there is need for a direct link from Poplar High Street to Canary Wharf the need for a 15m wide link should be justified within the document. Any proposed development on the DLR depot will have a mass and form which will respond to the need to allow for rights of light / daylight and sunlight and this would enable views from Poplar High Street to Canary Wharf. The impact of a 15m wide route would be to further reduce the building footprint on the site meaning that any proposed development would need to be taller to fund the provision of infrastructure (including the link).	p95, 5.4.2, Delivering links across Aspen Way	None
	TfL Commercial development	324	Point 4 (South Poplar Park) states that a generous connection across Aspen Way should be provided which includes clear line of site from North Dock and Poplar Library. This policy needs to be clarified for the following reasons: <ul style="list-style-type: none"> • Poplar Library is not in the vicinity of the development and is located on Gillender Street at least 1,500m to the North East of the site and not currently visible from the site. It is impossible for the development to provide a clear line of site from North Dock to Poplar Library. • The diagram shows proposed building frontages which would block the line of sight from North Dock to the Park and wording on the diagram should be amended to reflect this. The OAPF needs to be amended to reflect the key points above and provide coherent policy in regards to the Aspen Way / DLR depot site.	p95, 5.4.2, Delivering links across Aspen Way	Actioned
	TfL Commercial development	325	sets out proposed building frontages it does not mention potential building heights. The OAPF can better recognise the suitability of the site for tall buildings within the diagram and text in this section and identify within policy that tall buildings will need to be provided on the site to enable development and infrastructure delivery to come forward.	5.4.2 p93	Actioned
	TfL Commercial development	326	TfL CD agrees that it is important that development delivers the infrastructure required to deliver links across Aspen Way including decking of the existing DLR Depot and providing bridge links over Aspen Way to Canary Wharf; however, the cost of this infrastructure should be considered. The supporting Infrastructure evidence base document prepared by Peter Brett Associates estimates the cost of providing links and deck over an expanded DLR depot at £38 million. This is a significant cost and to fund this required infrastructure high quality residential-led development in the form of tall buildings will be required to optimise the development on the site.	p47	None
25	Docklands Settlement and Island Sports Trust	327	potential to expand existing changing room or uses to the arches. That the six arches owned by LBTH ,should be made a community asset and supported with a commitment to assign funds from the Community Infrastructure Levy and S106. The two charities are currently working on a scheme to turn four these arches into a community café and an event space and have raised 450K towards the project . Community Benefit would be the café and events space will provide flexible, supported employment suitable for returners to work. Staff who have been successfully employed within the café will be guaranteed an interview with Compass Group, a leading catering contractor. In this way, the café will act as a starting point for a sustainable career in catering. The refurbishment of these four arches will mean, for the first time in 20 years there will be toilets and refreshments for the park users plus first aiders available to park users who will be employed in the café.	4.2.3 millwall park arches supportive comment	None
	Docklands Settlement and Island Sports Trust	328	As a new community project, the arches have an opportunity to bring people from the Isle of Dogs' diverse population together. Not just another community space but a whole set of spaces that will have a range of opportunities, designed to appeal to the whole community. A steering group will be set up to ensure that the scheme continues to meet the needs of people locally. There are nine other arches that we also have long leases on but these are not owned by LBTH .	4.3.2	Actioned

No	Respondent	No	Comment	Section / page	Action
26	Riverside South	329	By way of background, we confirm that planning permission for a major redevelopment of the Riverside South site was first granted in 2005 (ref: PA/03/00377). Further applications were submitted and approved in 2008 (ref: PA/07/00935) and 2009 (ref: PA/08/02249) ("the 2009 permission") for two similar, very large floorplate commercial buildings (see details below). Crucially a material operation under the 2009 permission was carried out within the specified time limit. Further a Certificate of Lawfulness confirming that operations commenced prior to the expiry of the 2009 permission was issued by Tower Hamlets in November 2012 (PA/12/02639/NC). Therefore the 2009 permission remains alive and would be a material consideration for the determination of any future planning application at the site. The 2009 permission for Riverside South approved two towers of 241.1metres AOD and 191.34m AOD, comprising 341,924 sq m of commercial space.	general comment - context of site and planning permission status	None
	Riverside South	330	Riverside South is a unique site both in the context of the Isle of Dogs and also the Borough. It is a large brownfield site measuring over 2 hectares. It is on the edge of the Canary Wharf Estate and has a continuous frontage to the River Thames. The recent planning history of the site shows that it has huge capacity to deliver a large amount of floorspace for the Borough. It is evident therefore that the site can deliver a large proportion of the GLA's and Borough's employment and/or housing targets. In addition, other scheme benefits relating to social, green and blue infrastructure can be delivered by the Riverside South site. The arrival of the Elizabeth Line at Canary Wharf later this year, in addition to on-going enhancements to existing public transport infrastructure will further increase the capacity of this site.	general comment - context of site	None
	Riverside South	331	At Figure 3.2 the site is partially shaded red and identified as falling within a zone entitled "Predominately high rise, mixed use". We note this zone is drawn in a slightly haphazard manner, with part of the site not shaded and left as "white land". It is considered that the zone should cover the entirety of the Riverside South site. Further in the context of the 2009 permission (which provide for buildings rising to over 240 metres) it is considered that the Riverside South site should also form part of the tall buildings cluster designation. The extension of the tall buildings cluster would be entirely appropriate given permitted heights achieved on the site and the adjacent site, Newfoundland (which is a site currently under construction with a building comprising of 58 storeys (ref: PA/13/1455 and PA/13/1456)).	Figure 3.2	Actioned
	Riverside South	332	Figure 3.3 shows the site partially within the CAZ category B equivalent zone. It is unclear why this designation does not cover the entirety of the site. We suggest that this designation is amended to ensure that the whole of the Riverside South is covered by this designation. We are also unclear how the references to "core" and wider "activity approach" referenced at paragraph 3.4.7 relates to these CAZ category designations. The OAPF should be amended to ensure consistent terminology is used within the OAPF for the employment designations.	Figure 3.3, para 3.4.7	Actioned
	Riverside South	333	Paragraph 4.2 states that a detailed infrastructure study has been undertaken which has been used to inform various future infrastructure needs. We have reviewed the "Draft Isle of Dogs and South Poplar Development Infrastructure Funding Study", which we assume is the report referred to at section 4.2 (we cannot specifically see a report simply titled "infrastructure study"). This needs to be clarified and any additional report(s) forming part of the evidence base need to be shared as part of this consultation. 9. W	para 4.2	Actioned
	Riverside South	334	Figure 4.5 identifies the Riverside South site for a "proposed district heating centre". We are unclear what the rationale is for this designation, as the draft OAPF does not provide any detail on this site specific designation. At this stage, we are concerned by the lack of dialogue or detail on this aspect of the OAPF. We are unclear how Figure 4.5 has been prepared or the assumptions made. We would welcome further dialogue on this matter before the OAPF is published in final form. At this stage, we have significant reservations with the proposed designation and object to the OAPF as currently drafted in relation to this matter.	Figure 4.5	None

No	Respondent	No	Comment	Section / page	Action
	Riverside South	335	<p>Figure 5.1 identifies the Riverside site falling within a designated “Canary Riverside” sub area. Within this sub area Figure 5.1 identifies the site as forming part of an “area of change”, “responding to the existing character area” and “enhancing local connections”. These designations are all supported and it noted that our client is in active dialogue with TfL regarding the proposed River Crossing. Figure 5.2 highlights potential future connections. The potential for a continuation to a Thames Path along the river frontage on the Riverside South site is supported.</p> <p>Section 5.3.3 describes the existing character of Canary Wharf (in which the Riverside South site is deemed to fall - sub-area 3). The description of the existing character is supported, although the “height and massing” bullet point states “Tall office blocks and construction of high density residential development stepping down from One Canada Square”. We do not consider this accurately reflects the heights and massing of the character area. It is important to note, that the 2009 permission approved two towers of 241.1metres AOD and 191.34m AOD. The tallest building on the Riverside South site is permitted some 6 metres taller than 1 Canada Square. As noted above, the 2009 permission remains alive. The existing character area statement needs to reflect the specific locational and site circumstances that allow for a very tall building on the Riverside South site. Details of these locational and site circumstances are set out in the Tower Hamlet’s Committee Reports for the 2005, 2008 and 2009 schemes and associated GLA Stage 1 and 2 Reports2. It is to be expected that any future proposals for the Riverside South site would be at least as tall as the scheme approved by the 2009 permission. Accordingly, the existing character area statement in respect of height and massing should be reworded and a statement added to acknowledge the opportunity presented by the Riverside South site.</p> <p>13. We support the “Opportunities” outlined at section 5.4.3, which includes delivering a more diverse offer, opening buildings to the river front and delivering integrated walking and cycling routes. We do question though the guidance which states “massing should be composed to enhance the prominent river elevation, framing the Canary Wharf cluster from strategic and local viewing points”. In the context of the existing cluster, the location of Riverside South and the 2009 permission, it is unclear how this objective can be achieved and how in particular buildings can “frame” the cluster. Further it is considered that the starting point for any potential new building design is likely to be guided by the extant planning permission. We would suggest that this statement is revised accordingly.</p>	Fig 5.1 & 5.3.3 support the future connections and ‘canary riverside’ and area of change designations	Actioned
	Riverside South	336	<p>We have significant reservations with the indicative masterplan set out in section 5.4.3. Whilst we accept that it is not proposed to be prescriptive, it is stated that it is proposed to be “a tool to assist consideration of development proposals”. We have had no dialogue with the “masterplanners” who have devised the plan and it appears it does not take into account the 2009 permission. The indicative masterplan seems little thought through (see our detailed points below) and we consider it should not form part of the OAPF in its current form. We do not consider the “key proposed building frontages” at 5.4.3, which is effectively drawn to represent proposed building footprints, is based on sound urban design principles. There is no analysis or assessment to substantiate the proposed layout. The proposed Upper Bank Street direct line of sight from Jubilee Park to the River Thames is now physically impossible to achieve. We would urge officers to stand in Jubilee Park and look along Upper Bank Street. The vista from Jubilee Gardens looking west is impeded by the DLR line, the Newfoundland development and the Heron Quays West development. In addition, the proposed “direct line of sight” does not take account of the 2009 permission. Further we do not consider such local level detail should be set out in a strategic planning document. We do however confirm that our client is supportive of “number 5” at 5.4.3, which directly relates to the Riverside South site and seeks improved connections, opportunities for greening and improving access to the foreshore [of the River].</p>	5.4.3	None
	Riverside South	337	<p>Whilst not directly related to the Riverside South site we also question the creditability of “number 2” at 5.4.3, which suggests “a new pocket park on the listed former west entrance lock to the South Dock”. We query what analysis has been undertaken to indicate the appropriateness of a pocket park in this location, comprising a listed structure.</p>	5.4.3	None

No	Respondent	No	Comment	Section / page	Action
	Riverside South	338	Section 6.2 notes that the Development Infrastructure Funding Study accompanying the draft OAPF suggests that there may be scope for increasing some charging rates in some of the OAPF area, in particular, high values and densities in Canary Wharf and South Quay. At this stage we feel that such a statement is premature and potentially prejudicial to a future evidence base that will need to be prepared to support any revised CIL rates. We suggest that this statement is omitted from the finalised version of the OAPF. Further it is not clear that the DIFS has considered the delivery of environmental and social infrastructure that will be brought forward as part of large development schemes in concluding that there may be scope to increase rates. It is evident for example that the Riverside South site will be expected to provide much on-site planning gain to deliver the GLA and LBTH's ambitions relating to this part of Canary Wharf, in addition to monetary contributions (CIL and S106). It is considered that on site delivery of environmental and social infrastructure must be given due weight in the consideration of such schemes and in the reviewing of charging rates.	6.2	None
27	ASDA - Operates a large supermarket (4,983 sqm net) with associated car park and petrol filling station (pfs) at East Ferry Road, Crossharbour.	339	Given the important role their store, car park and petrol filling station to the overall vitality of the area, Asda is supportive of the principles of the Opportunity Area Planning Framework (OAPF) which sets out in Section 1.2 that the delivery of growth in the area must 'reflect the principles of 'good growth' which also meets the needs of the existing local communities of the Isle of Dogs, South Polar and the wider Tower Hamlets and East London areas. While the Isle of Dogs and South Poplar opportunity area has great delivery potential, there are also planning related issues which need to be addressed to ensure the ongoing success and cohesion of the local communities'. Asda fully endorse such principles.	general comment support principles of good growth in OA	None
	ASDA	340	Section 5.4.6 of the OAPF identifies Crossharbour as a 'new district centre for Island Gardens and Cubitt Town'. Important components of the revitalise centre are identified. however, document is silent regarding the importance of the existing Asda store, associated car parking and petrol filling station to the existing local commult should be acknowledged that the existing ASDA store provides an important facility for the local community within the area. Re-provision of such facilities as part of any wider redevelopment proposals of the area will be critical in delivering the anticipated benefits to the existing local community and facilitating growth, and this should be recognised in the Framework. Indeed, none of the components of the existing Asda (i.e. store, car park & pfs) are referred to in Section 5.4.6.	5.4.6	Actioned
	ASDA	241	The need to secure a modern supermarket facility as part of any redevelopment proposals for the district centre is vital so it can compete effectively with surrounding centres and out-of-centre provision and thus retain local expenditure. This consideration has a bearing on scale and the provision of car parking (albeit located in a basement as part of any redevelopment scheme). The inclusion of a customer car park of sufficient scale is critical to ensuring the success of the foodstore and the wider District Centre to encourage spin off benefits associated with encouraging more people to shop locally especially for bulky goods shopping trips, for which a car will be required. Whilst it is recognised that minimising car use is supported by policy it is also recognised that the viability of a large foodstore which seeks to serve local communities will, in part, rely on trips undertaken by car.	5.4.6	Actioned
	ASDA	342	Moreover, it is noted that the existing pfs is the only provision on the Isle of Dogs. In fact, the only other pfs provision within the OAPF area as a whole is the Texaco garage at Cotton Street which is located at the northern extremity of the OAPF boundary. Put another way, the pfs at Crossharbour District Centre provides a very important role for the existing local community and should be retained/reprovided in any redevelopment proposals for the District Centre as a whole.		None
28	Local resident	343	The proposed walking routes map on page 23 will not work for residents who live along the Westferry Road side of the island. There is a really important need for an easy walking route to the DLR and Jubilee line stations at Canary Wharf that goes from near the top of Westferry/Junction of Byng Street and enables people to walk around the west side of the South Dock, having crossed the road at Marsh Wall through the gap between the two the Landmark developments. The reopening of Heron Quay road into Bank Street is essential. It's not reasonable to expect walkers to walk all the way up to Westferry Circus to access the Canary Wharf estate as suggested by the map on p23. No one use this route.	p23	None

No	Respondent	No	Comment	Section / page	Action
	Local resident	344	23It is absolutely essential that the main bus route on/off the Canary Wharf estate includes the currently closed route via Heron Quay and Bank Street. All of us bus users on the island have endured years of misery because Canary Wharf estate have temporarily closed Bank Street/Heron Quay. This makes using buses and bus stops on the Canary Wharf estate a real problem as buses travelling both north and south use the same stops - there are confused people at the bus stops every day. The bus journey north to canary wharf from the island takes considerably longer because of this diversion, especially for passengers wanting to get to the Jubilee line, compared to the very direct route that was in operation before the road closure and diversion. At the end of the bus journey there is now a tricky walking route to the Jubilee line station involving changes of height and negotiating restaurant crowds. It puts people off being willing to live on the southern half of Westferry Road because they think the bus takes too long to get to the Jubilee Line station.	p.23	None
	Local resident	345	Canary Wharf Estate have favoured wharf worker commuters over local people by closing bus stop H and making it available only for long distance commuter coaches. The local community have never been consulted about this and our anger has fallen on deaf ears and we have been told to walk to the nearest bus stop. This is a disgusting attitude and many islanders who have mobility issues find the closure of bus stop H a real problem. An alternative solution would be easy to create once buses are allowed back down Bank Street/Heron Quay.		None
	Local resident	346	I am very disappointed to see that the OAPF has already assumed that there will be a river crossing to Rotherhithe and that it will be at the southern-most option. I was at the public consultation about the crossing, I know how angry and concerned local people are about the crossing, and it is clear that the Mayor has no regard for our concerns what so ever and is intent on pursuing yet another Mayor vanity project. This is the most dangerous place to have the crossing join the island. Westferry Road is already completely over-congested at that point, with serious problems added by Tesco delivery lorries. This is really outrageous that our views are not being considered. If cyclists are allowed to join Westferry Road at this point in large numbers it will make Westferry Road effectively unusable to vehicle traffic including buses because the congestion will be unimaginably bad. The few cyclists who already join Westferry Road at that point do so at high speed and pull out straight in front of vehicles already on the road. It's perilous. If there must be a bridge, it should join the island further north where it is safer for cyclists to join the road.		None
	Local resident	347	I am very concerned that Klein's Wharf on Westferry Road has been identified as a future development site. Has the GLA discussed this with the owner of the site? Safeguarding the heritage of the dock landscape is meant to be an important part of the plan. Klein's Wharf is the only remaining piece of industrial heritage on the Island. It is essential that it is preserved to ensure that there is some recognition of the past industrial heritage of the Island.		Actioned
	Local resident	348	I'm very surprised there is no community hub for the large section of Westferry Road south of the Westferry hub. This area will contain thousands of people who will not have adequate local services and so will be forced to travel.	p51	None
	Local resident	349	OAPF notes that there is a shortage of schools even based on baseline growth and approved developments, and provides no clear plan about how these schools will be accommodated. I find this astonishing and shows a lack of accountability on the part of GLA who are encouraging growth but not prepared to do the leg work to identify where the required infrastructure is going to go. It is completely unacceptable that school accommodation is envisaged as being provided off the island – the journey on and off the island is simply going to be too difficult and too long for school children to be expected to undertake every day, given the large number of people that will be moving around. Developers building on the island currently are promoting to potential purchasers that their child should travel off island to go to school. This will simply encourage more car use. No more development should be approved until the locations of schools for the minimum level has been agreed.	p52	None

No	Respondent	No	Comment	Section / page	Action
	Local resident	350	Currently it is not possible to play badminton or squash at a public facility on the Isle of Dogs, and the current gym accommodation at Tiller Road is terribly old and unpleasant to use and frankly not safe. There needs to be a commitment to the provision of proper leisure facilities on the Island that are open to the public at all hours (not just outside school hours). Otherwise if the thousands of people who live on the island will be forced to visit sports facilities off island, this will add to car use and traffic congestion.	p.56	None
	Local resident	351	Document says action will be taken to improve air quality, but no mention is made of the serious negative impact that cruise ships moored by the Isle of Dogs is already having and will continue to have when the new cruise ship terminal is built at Enderby Wharf. What action is going to be taken by the GLA to mitigate the serious air quality impact this is going to have on the OAPF area?	p.58	None
	Local resident	352	The development where I live is responsible for the sea wall by Millwall slipway. I am really worried that the people who live on our estate might be landed with unexpected bills for the improvements to flood defences that are mentioned. We have not been consulted or involved in this, even though we have to pay for repairs to the sea wall. Consultation about this should start immediately so we understand where we stand. The same applies to proposals to open the public footpath in front our development – are we as residents on the site expected to pick up the bill for improving and maintaining the footpath if it becomes part of the Thames Path (because it will be on land that we are responsible for)? What is the basis for committing us individual residents with this increased financial responsibility?	p.58-61	None
	Local resident	353	All new developments should be required to have off-street underground delivery bays. The amount of vehicles doing deliveries to residential developments on the island is a very significant issue and arises as a direct result of people not owning cars and therefore having to have all their purchases delivered. Where there is not off-street or underground delivery bays, delivery vehicles constantly block the narrow roads all over the island. Tescos at Westferry is a really shocking example of the havoc that is caused by delivery lorries every day.	p.62	None
	Local resident	354	Additional bus capacity on the island will definitely be required. Although TFL increased bus capacity within past months, the level of passenger usage in the morning has already exceeded the increased capacity and large numbers of passengers have to queue at bus stops along Westferry Road travelling north in the morning rush hour because they cannot get on the bus which is already full by the time it arrives at bus stop R.		None
	Local resident	355	The importance of Westferry Road as a major connecting route is correctly identified. However, the reality is that Westferry Road is dug up so frequently that within our family we joke that it has a zip up the middle that is constantly opened. The level of planned development, and the lack of any other place to run and service major utilities, means that “the zip” will continue to be open on a regular basis for years to come. Because the road is so narrow this has a serious impact on traffic, particularly public transport buses which have no alternative route they can use. This disruption needs to be factored into the planning, and the volume of development, building and people that can be accommodated at the same time. The issue must have an impact on the response times of emergency services.	68	None
	Local resident	356	It should be recognised that the Canary Wharf zone is effectively a physical strangle-hold on the Isle of Dogs because within the Canary Wharf zone is the only way on and off the island. So, ANYTHING that happens in the Canary Wharf zone affects EVERYONE who lives on the island.	76	None
	Local resident	357	You have failed to mention that the Millwall and Cubitt Town area has the highest density housing in the whole of the UK, if not Europe. Also, that it is home to some recently built very ugly buildings, including the winner of the Carbuncle Award. This would be funny, but it isn't when you have to live with looking at these ugly buildings every day. You also haven't mentioned the nationally important Docklands Sailing Centre.	80	Actioned

No	Respondent	No	Comment	Section / page	Action
	Local resident	358	You need to recognise that the Thames Path is going to be impacted by the very large development site at the top of Westferry Road where the basement has been built but other building work has been put on hold for some years. There is a temporary Thames Path in place currently. This is going to be a massive building when it is finished and it's not clear to me if the Thames Path will remain open in front of it.	84-85	None
	Local resident	359	I simply can't imagine where the vision set out here is actually going to be fitted in to a largely already built or with approved planning permission. I think it is wrong to move the Rotherhithe river crossing further south because of the risks to road safety. If the planners had not allowed all the tall buildings at the west end of South Dock, North Dock and East India Dock those areas would have been much more suitable for this water-front vision.	96-97	None
	Local resident	360	I think it is really wrong to build over the listed west entrance to South Dock – this is an important bit of docks history and people should be able to understand how the docks are connected to the Thames. Covering this inlet over would mean that understanding of river heritage is lost for ever. I can't believe that English Heritage would allow this. I think the docks should be preserved, but sadly the planners have already allowed a lot of development in Heron Quay to take place IN the water. The docks are already shrinking rapidly. Please see the illustrations on page 11 of the Local Connections Strategy which shows the recent loss of dock water with great clarity.	98	None
	Local resident	361	I am really concerned about how the huge numbers of cyclists expected to cross the new Rotherhithe river crossing are going to impact on pedestrians and cyclists travelling north/south along the river front. This is a "set up to fail" scenario that will create a massive amount of pedestrian/bike conflict. It is really important that Upper Bank Street is reopened soon to pedestrians and buses to ease congestion around the rest of the Canary Wharf estate and also to make a better walking route from Westferry Road, through Landmark, across Marsh Wall and up to the Jubilee Line via Heron Quays.	98	None
	Local resident	362	Limeharbour and Millharbour parks and a park on the site of Greenwich View site by Millwall Dock would be very welcome if they are of a sufficient size and will be properly maintained. I fear though that they may be extremely dark because of the shadow cast by the surrounding high towers. It's not clear to me that this land is available and that the parks have been agreed. This agreement is vital and should be sought immediately.	102 - 112	None
	Local resident	363	104-105 It is welcomed that the Docklands Sailing Centre will be protected, but it's therefore a great shame that the Print Works development has already been approved by the previous Mayor of London which, because of the thoughtless design, will have a serious and negative impact on the ability of young people to use the Millwall Dock safely for sailing training.	p.104-105	None
	Local resident	364	104 The principle of family homes with access to schools is to be welcomed, however there is no detailed plan in the OAPF of how the minimum number of new schools required will actually be accommodated on the island. There is also no guarantee that the new secondary school provided for at the Print Works will be available to local school children to attend. So; something has to change in order for this principle to be achieved.	p.104	None
	Local resident	365	106-107 It's very disturbing to see on a printed page a new road going through our homes (extension of Millharbour and extension of Tiller Road). I think it would be much more appropriate for someone to come and talk to us about these proposals before they are made public. This makes me feel very threatened by the proposals because no one has bothered to come and talk to us about them. Why are these new routes even needed?	p.106-107	Actioned
	Local resident	366	112 Surely one of the most important components of good design is to first involve the existing local community – it's disgraceful that this is omitted and really shows what little regard the GLA has for the local community.	p.112	None

No	Respondent	No	Comment	Section / page	Action
	Local resident	367	<p>No more development should be allowed around Millwall Dock as this has such a negative impact on the ability of people to use the Docklands Sailing Centre as the flow of wind is so badly interrupted.</p> <p>101The Dock water has been so seriously polluted in the recent past that the Great Swim had to be cancelled on the day of the race. More research needs to be carried out and more protocols agreed that will protect the dock water from pollution created by run off from the various new developments being proposed.</p> <p>108Trees should be preserved; however, the Print Works has already been allowed to remove a number of very large and substantial trees which will not be replaced at the same scale.</p> <p>109There is a real shortage of trees in Westferry Road and a real problem because there isn't enough space to plant more trees, particularly at the north end.</p>	p101	None
	Local resident	368	<p>I wish to finish my contribution to the consultation with a formal complaint about the poor and inadequate level of public consultation about the OAPF. This is going to be the site of the single greatest level of development in the UK if not Europe, in an area that is already heavily populated. To have only offered the level of consultation that is outlined on (two short sessions at stations) is disgusting and unacceptable. I was at the Meet the Mayor events (which were events for Tower Hamlets people to meet the Mayor of Tower Hamlets, they were not GLA consultation events), I lobbied the GLA staff who attended the meet the mayor events and was promised there would be adequate consultation. Where is it? Page 19 of the main consultation document sets out the paltry amount of public consultation that has taken place. Putting on two very short events at hours when people who work elsewhere in London can't get to just isn't good enough. It is a travesty of democracy and GLA should be lambasted for it.</p>	p.19	Actioned
29	IoD Neighbourhood Forum	369	<p>We broadly welcome the OAPF and would like to thank all of those concerned for the amount of work that has gone into it.</p>	General	None
29	IoD Neighbourhood Forum	370	<p>There are two fundamental objections related to development on the Isle of Dogs and South Poplar.</p> <p>1.That the infrastructure available and planned does not match the scale of development coming. That we are creating an infrastructure deficit which will make development unsustainable. We therefore welcome the OAPF and in particular the DIFS which makes clear the scale of infrastructure required. But we are concerned about the delivery of and funding for that infrastructure.</p> <p>2.That the density of development is excessive and far beyond anything forecast and that the result won't be a good place to live despite the emphasis on good growth. This is made clear by the LUC reports as part of the South Quay Masterplan on the mitigation required at different levels of density. The OAPF nor new London Plan does not really deal with what is an appropriate level of density is. But the critical issue will be whether or not the OAPF is delivered and the delays in publication and the delays in delivering infrastructure described as critical enabling works which have not yet been delivered.</p>	general comments/delivery comments	None
	IoD Neighbourhood Forum	371	<p>What is your vision for the future of the Isle of Dogs and South Poplar? See IoD Neighbourhood Planning Forum vision statement which starts with this line "A liveable environment in which our diverse community can work, rest and play"</p> <p>What does good growth in the Isle of Dogs & South Poplar mean to you? That development does not ruin one of the best places in live in London. That we have the infrastructure required. That we actually make it a great place to live and that people choose to come here because of the opportunities.</p>	general comments	None
	IoD Neighbourhood Forum	372	<p>1.Assuming the petrol station as ASDA goes as a result of re-development there would only be one petrol station left at Cotton Street in the OAPF area (which is often inaccessible due to rush hour traffic heading towards the A12/Blackwall tunnel)</p> <p>But even if the proportion of vehicles declines with less parking in new developments the absolute number will increase especially if taxis and delivery vehicles are included. The documents do not really indicate the solution whether protecting petrol stations, adding new ones or further encouraging the move to electric through supplying electric charging instead. If no such facilities are not provided residents, taxis, delivery vehicles etc will drive further for fuel generating more traffic.</p>		None

No	Respondent	No	Comment	Section / page	Action
	IoD Neighbourhood Forum	373	2. Grocery stores and food delivery – people need to eat, the patchwork of Tesco's only one of which is a location designed for truck delivery (which is to be knocked down) show that almost no planning has gone into this sector i.e. delivery truck parking. Retail is treated as a category, but the needs of large grocery stores are very different from shops selling jeans. That Blackwall has only 1 grocery store is a good example of the failure to plan.		None
	IoD Neighbourhood Forum	374	What community infrastructure would you like to see in the Isle of Dogs and South Poplar and where? We would add playgrounds. The playgrounds provided by existing developments either do not exist or are very poor. Existing LBTH playgrounds need to be re-designed and upgraded to cope with expected population increases. We would also add multi-use community centres like at Alpha Grove or St Johns. These are distinct from libraries or sports halls (although they could be co-located).	4.2	Actioned
	IoD Neighbourhood Forum	375	What should the role of the Community Development Panel and Developer Forum be? To actually exist. To encourage developers to work more closely with residents. Do you think the major future planning requirements needed to help deliver the good growth ambitions outlined in this OAPF have been captured? Yes, but not the means to deliver them.	part 6	None
	IoD Neighbourhood Forum	376	A PTAL map should be added to the main OAPF document (it is in the transport strategy). The main document does not make clear enough the fact that the PTAL levels in the area vary a great deal from 6b down to 1b. The document otherwise implies that transport is the same everywhere, it is not. PTAL Map not matching - The PTAL and improvements to 2031 do not seem to match in some locations the PTAL forecast in the WebCAT tool available online here https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat?lat=&lon=&type=Ptal&locationId=&input=&zoomLevel=13&places=Stations+stops+and+piers%7CPTAL+Values&places=Stations+stops+and+piers%7CPTAL+Values&comparePtalYear=&scenario=2031+%28Forecast%29&name=2011 For example, the transport strategy says PTAL for Greenwich View is 3 in 2031 but TfL's WebCAT model says its 2 in 2031. Similar issues for London City Island, Transport strategy = 6a versus WebCAT = 2. We are unclear as to whether the transport strategy would materially change transport at these locations by 2031. So, one of these is wrong (the contour lines are also different).		None
	IoD Neighbourhood Forum	377	Family Housing 3.4.2 We welcome this. Some new buildings are not very family friendly or are in locations a long way from would be better suited for families given greater access to play space, schools and parks. Affordable Housing 3.4.3 We do not believe that highly dense developments (Landmark Pinnacle, Newfoundland, Dollar Bay, Pan Peninsula, Spire) are ideal family homes although would be better suited to individuals needing 1 or 2 beds. But social rent & intermediate housing generally have a higher number of bedrooms than private housing. So, we have a contradiction here, we are putting family sized housing into very high-density developments which are not family friendly or specifically child friendly. LBTH has managed that to some extent by allowing the construction of housing nearby which is more family friendly i.e. Landmark Pinnacle and Island Point. Dollar Bay and Thomas Road. The OAPF assumes all new development is equally family friendly, we would dispute that.	housing 3.4.3, 3.4.6	None
	IoD Neighbourhood Forum	378	Housing 3.4.6 We would add 'managing the relationship between different tenures'. We have an issue with the same building being often managed and maintained by different people because the housing association and private landlord employ different contractors. It creates a divide within communities as generally the private housing associations are quicker to repair common issues i.e. heat exchanger units in Landmark. Buildings are built as one development and then the management is split even if using the same equipment.	3.4.6	None

No	Respondent	No	Comment	Section / page	Action
	IoD Neighbourhood Forum	379	<p>We welcome a more diverse employment. We have a concern though over the mix of employment. For example, if Billingsgate Fish Market does leave the area and is replaced in part by offices the nature of employment will change.</p> <p>The same thing is happening along Marsh Wall, office space better suited to SME's is being lost to residential even if the overall quantity of office space is increasing thanks to CWG. But office space in the CW estate is either not suitable or cost effective for some companies. Where are the new workers coming from? One of the unspoken assumptions of development on the Isle of Dogs is that new residents will be working in Canary Wharf (& can therefore walk to work solving some of the transport issues).</p> <p>While some are the majority of existing residents do not, they work or study or travel elsewhere. Canary Wharf Group travel surveys and anecdotal evidence backs this up. It would be useful to survey current residents of places like Pan Peninsula, Landmark, Dollar Bay etc to see where people are actually working or travelling to.</p>	Employment 3.4.8	None
	IoD Neighbourhood Forum	380	<p>It is not clear what are the main purposes of the proposed new ferries between Greenwich and Blackwall are. Are they to bring people into CW from Greenwich, are they to improve transport access from Greenwich to other parts of London by Thames Clipper or are they to connect cyclists to the cycle network, are they to help the hotels?</p> <p>Answers to these questions would help determine the ideal pier location.</p>	4.1.2 Transport and Movement Key Principles	None
	IoD Neighbourhood Forum	381	<p>On the 12th July 2017 Steve Quartermain Chief Planner wrote a letter which starts "This letter is to remind local planning authorities of the important role the planning system plays in ensuring appropriate measures are in place in relation to counter-terrorist and crime prevention security." We do not see these mentioned in the OAPF. Security, Crime, Terrorism, ASB</p> <p>These words do not appear anywhere in the OAPF document (although there is a reference to CCTV in the DIFS). Only the requirements for a new Police station is mentioned. We believe this to be a material omission given the 1996 IRA bomb, drug dealing, recent moped related crimes and ASB in the area. How do we deal with the thousands of teenagers expected to live in the area, what to do they do and where do they hang out?</p>	general omission	Actioned
	IoD Neighbourhood Forum	382	<p>South Poplar access to CW but to the south? We can see why people in South Poplar need to head south to access transport, jobs and retail but there is little reason for the reverse to happen (except to access Chrisp Street Market)</p>		None
	IoD Neighbourhood Forum	383	<p>Crossrail delayed opening – need to amend text for delay</p>		Actioned
	IoD Neighbourhood Forum	384	<p>Population Forecast - Page 17 of the OAPF has this table (we added the residents per home calculation). It is interesting that the 2011 Census produced different numbers (although for a different mix of homes). It would be useful to add a Future Study on page 119 of the OAPF to better understand the demographics of the new developments. What % of housing is occupied by students, short term lets, number of children, number of people per home etc</p> <p>HomesResidentsResidents per home OAPF Options Maximum49,000106,0002.16 High38,00081,5002.14 Baseline31,00072,5002.34 2011 Census Canary Wharf 20116,16612,5002.03 Blackwall & Cubitt Town 20116,22713,5312.17</p>	p17	None

No	Respondent	No	Comment	Section / page	Action
	IoD Neighbourhood Forum	385	Number synchronisation - There are different housing growth numbers in different places in the documents. Given the detail in the DIFS related to infrastructure and finances it would be desirable to base numbers on those in the DIFS for consistency as the different numbers has already created confusion. OAPF p17DIFS page 5DIFS p7 Maximum 49,000 49,000 48,997 High 38,000 37,000 36,549 Base 31,000 32,000 31,362	query housing numbers	None
	IoD Neighbourhood Forum	386	DLR 24 hour – noise impact - The DLR travels through the area on elevated tracks. Due to residential developments being built within meters of the track (which are not air-conditioned) how will TfL reduce the noise when the DLR runs through the night at weekends?		None
	IoD Neighbourhood Forum	387	Sites like Trinity Buoy Wharf and Island Health have been marked as future potential sites. What weight in law would these allocations have? Would they act like Site Allocations in the Local Plan? It should be made clearer which are viewed as primarily residential or commercial potential sites as we initially thought Trinity Buoy Wharf was for residential development.	Site Allocations page 33	Actioned
	IoD Neighbourhood Forum	388	Transport to support additional jobs 110,000 additional jobs are forecast at Canary Wharf. It is not clear from the Transport Strategy whether sufficient capacity exists to support that growth. Canary Wharf Group believe not, they believe an additional major transport connection is required. It would be extremely useful to indicate how the following transport improvements are meant to increase rush hour capacity into CW from outside of the OAPF area. •Elizabeth line •DLR expansion •Rotherhithe crossing •Bus •New bridges		Actioned
	IoD Neighbourhood Forum	389	Currently only has one convenience store (NISA) and a small grocer at London City Island. It has no schools, GP surgeries, only one little known community space managed by OHG, only a few small playgrounds and one poor park. There is almost no public CCTV network except in the Prestons roundabout underpass.	5.4.1 Blackwall	None
	IoD Neighbourhood Forum	390	The risk is that it becomes like Marsh Wall, very tall, very dense with inadequate supporting infrastructure i.e. bus access is poor.	5.4.2 South Poplar	None
	IoD Neighbourhood Forum	391	Greenwich foot tunnel: The Transport Strategy implies that the Greenwich Foot Tunnel could be used for cycling. This is contrary to existing By-Laws and is probably illegal The GLA & TfL need to be clearer otherwise Greenwich Council will quote you as supporting cycling in the tunnel which is extremely unpopular on the IoD.		None
	IoD Neighbourhood Forum	392	Recommendation 1: We believe that residents should be on the LBTH Delivery Board. Delivery Mechanism: The OAPF has been underway since at least autumn 2014 but there is little evidence on the ground yet of any improvements despite a large number of homes currently under construction and new planning applications submitted. The DIFS indicates that substantial sums should have already been spent in 2017/18, almost none of that has been.	6.1 The Delivery Plan	None
30	City of London Corporation	393	The Mayor of London's proposed designation of the northern part of the Isle of Dogs as a CAZ satellite in the draft London Plan (which is expected to become part of the statutory development plan in 2019) post-dates the preparation of LB Tower Hamlets' ('LBTH') draft Local Plan which was examined in autumn 2018. Consequently, the emerging Local Plan does not include this designation. CoL welcomes the inclusion of this important spatial designation in the OAF so that the OAF reflects the most up-to-date strategic policy situation, particularly given that the OAF "takes a long-term view to 2041" ¹ which is beyond the life of the new LBTH Local Plan (which covers a plan period to 2031). CoL considers it appropriate that, as illustrated in the OAF, Billingsgate is in the "CAZ B equivalent" area ² and considers that the Billingsgate site is suitable for a range of CAZ-type uses, in particular employment and residential. CoL supports the OAF's recognition that Billingsgate is a suitable location for tall buildings which presents a greater opportunity to support economic development and the delivery of new homes in a highly accessible central location.	General	None

No	Respondent	No	Comment	Section / page	Action
30	Significant stakeholder in this area through its ownership of the Billingsgate Market site ('Billingsgate'), comprising approximately 5.7 hectares of land which is adjacent to the Canary Wharf Estate. Billingsgate presents an important opportunity to make a significant contribution to the delivery of new homes and new economic activity in the Opportunity Area ('OA') and, in doing so, deliver benefits for both the London Borough of Tower Hamlets and London as a whole, strengthening the capital's role as a world-leading city.	394	<p>CoL welcomes and strongly supports the proposed approach to social and community infrastructure at Section 4.2 whereby social infrastructure will be co-located in proposed 'community hubs' such as Poplar High Street, Wood Wharf, East India and Marsh Wall. CoL also supports the recommended options³ for the delivery of new schools by inter alia taking a borough-wide approach to secondary school provision and using sites beyond the OA, and by adopting innovative design solutions to school provision within mixed-use schemes; the development of mono-use schools that are set in their own enclosed grounds would not be a good use of land, particularly in the 'CAZ equivalent' area.</p> <p>This is a pragmatic approach which will enable the potential of sites in the 'CAZ equivalent' area to be optimised for CAZ-type uses (such as economic activity and housing) and for other facilities such as schools to be located in more appropriate locations such as 'community hubs' where the whole community will be able to benefit from the shared use of facilities.</p> <p>Importantly, and given that the community hubs tend to be focused on existing local centres, the delivery of infrastructure at community hubs to support growth in the OA will mean that existing communities will also benefit from new facilities. This is much less likely to be the case if new facilities were provided on sites such as Billingsgate which are much better-suited to, and ideally-located for, CAZ-type uses.</p> <p>This area-wide approach will also ensure that there is a good distribution of facilities across the OA rather than facilities being delivered on an ad hoc basis as and when individual development sites are brought forward.</p> <p>To ensure that the right social and community infrastructure is delivered at the right time, the OAF should clearly set out delivery mechanisms. Where developers are expected to deliver social and community infrastructure that serves more than their own development, clear mechanisms should be in place to ensure that they are fully 'compensated', for example (but not necessarily limited to) by way of a CIL payment in kind mechanism. It is extremely important that developers are given such certainty before they commence design work on their proposals and begin to engage with development management process.</p>	General	None
30	City of London Corporation	395	<p>Relationship with the Development Plan</p> <p>The proposed approach to community and social infrastructure differs from that in LBTH's draft Local Plan. For example, LBTH's draft Local Plan indicates that a secondary school is an "infrastructure requirement"⁴ at Billingsgate.</p> <p>Given that the draft LBTH Local Plan was prepared before the CAZ designation was proposed, we consider that the more up-to-date guidance in the OAF should prevail when considered alongside the new Local Plan because, in respect of the CAZ designation, the new Local Plan is not consistent with the Mayor of London's emerging Spatial Development Strategy. CoL would welcome confirmation of this in the OAF.</p>	4.2 & chapter 5	None
30	City of London Corporation	396	<p>Connections</p> <p>It is clear that the improvement of connections and the reduction of severance is an important component in the delivery of the wide-ranging aims of the OAF. CoL supports these aims, and in particular the physical opening-up of greater opportunities for people in communities to the north of Aspen Way. Billingsgate lies to the south of, and has a significant frontage with, Aspen Way. The OAF seeks to reduce the severance effect of Aspen Way through new physical connections between land to the north and the south of this major highway. Billingsgate potentially will play an important role in addressing the severance effect, especially if part of the site is needed to 'land' a crossing or crossings.</p>	5.4.2	None

No	Respondent	No	Comment	Section / page	Action
30	City of London Corporation	397	<p>CoL considers the OAF and the related evidence base to be confusing as to the aspirations for a crossing; there are multiple different locations and types of crossing in these documents, some examples of which are below. REFER TO SUBMISSION FOR DIAGRAM SUGGESTIONS The location of a crossing or crossings will have to be decided with great care so as not to harm the development potential of land on either side of Aspen Way, particularly given the significant level change that will need to be addressed and also bearing in mind that any crossing will need to maximise the ease of use for pedestrians and cyclists; this might mean a very long ramped lead-up to a crossing which could present a significant challenge to place-making and result in the severance of sites, particularly if an approach like that illustrated on page 95 is brought forward (which shows four crossing points in the vicinity of Billingsgate, two of which are joined by a park spanning Aspen Way).</p> <p>We are not convinced that multiple crossings would be a successful solution in practice or would deliver materially greater benefits when compared with a single high-quality crossing. In that context CoL considers it essential that the OAF either makes it clear that its illustrations are purely illustrative or, otherwise, provides greater definition of the proposed crossing.</p>	p.95	Actioned
30	City of London Corporation	398	<p>Also essential that the delivery mechanism is clearly set out. Whilst land to the north and south of Aspen Way is key to the delivery of an Aspen Way crossing, the benefits of a crossing will be much more widespread. It will, for example, benefit commuters interchanging between Canary Wharf Crossrail station and Poplar DLR station. Its use will not be restricted to occupants of the development sites but will be an attractive route for the many visitors to existing facilities on the Isle of Dogs and for residents in Poplar and beyond.</p> <p>As such the development sites should not bear the full cost of delivering such a link nor should the developers have to fund the link as a condition of the grant of planning permission. Crucially it must not be the case that the failure of one party to participate in the design or delivery of a link should prevent the development of another site.</p> <p>Rather, the OAF must set out the means by which a link would be financed and delivered, and it must be development in the OA as a whole that should pay for such a link rather than just the sites that would physically facilitate a link. It should also set out a clear mechanism for brokering a design solution between landowners so that the failure of one or more parties to engage does not prevent the development of one or more sites in the OA from being progressed; a solution may be for LBTH or the Mayor of London to lead on delivery of a crossing with the funding being recouped from CIL payments from development within the OA.</p>	p.95	None