

Planning Committee

London Thames Gateway Development Corporation

Tower Hamlets Core Strategy 'Options & Alternatives' Observation Report

Report of the Director of Planning

1. Purpose of this report

- 1.1 Tower Hamlets have released their Core Strategy 'Options & Alternatives' document for public consultation. The report covers the overall spatial strategy and its implication for key LTGDC projects.
- 1.2 The report considers the merits of the options from the point of view of the LTGDC and focuses on further considerations that should be taken into account in the development of the next stage 'preferred options' Core Strategy.
- 1.3 For clarity the text in italics in the main report and detailed appendix will form the basis of the formal response to Tower Hamlets.
- 1.4 LTGDC Planning Committee has responsibility for considering policy documents and formally providing comments. Any comments arising from this meeting will be incorporated into the formal response of the Development Corporation.
- 1.5 The Tower Hamlets draft Core Strategy can be viewed at:
<http://www.towerhamlets.gov.uk/data/planning-building/planning/data/policy/data/ldf/data/core-strategy.cfm>

2. Background

- 2.1 London Borough of Tower Hamlets is consulting on the 'Options and Alternatives' document, as part of the first stage in preparing its Core Strategy. The Core Strategy will ultimately provide the overarching spatial vision for managing growth and development in the borough up to 2020. The implementation of the plan will extend to 2025.
- 2.2 In November 2006, following extensive consultation, Tower Hamlets submitted six Development Plan Documents to the Secretary of State, including a Core Strategy. In October 2007 the Council sought the

withdrawal of all plans, except for the Statement of Community Involvement. This was owing to issues relating to the style and structure of the submitted plans.

- 2.3 Following the withdrawal, the Council has been preparing new plans, the first being the draft Core Strategy. All the early consultation findings and background research has informed the drafting of this Core Strategy 'Options and Alternatives' report. The Statement of Community Involvement was adopted in February 2008.
- 2.4 The main issues arising from the draft Core Strategy are outlined below, with additional comment regarding the broad principles in the appendix. It should be noted that, at this stage, the document does not commit to a particular course of action per se, but the eventual preferred option/submission version should be such that it will facilitate the regeneration objectives of the LTGDC.

3. Role of Core Strategy in Spatial Planning

- 3.1 This section explains the role of the Core Strategy within the wider LDF based planning system. Tower Hamlets as local planning authority with plan making powers is required to produce a core strategy which includes:
 - An overall vision which sets out how the area and the places within it should develop;
 - Strategic objectives for the area focussing on the key issues to be addressed;
 - A delivery strategy for achieving these objectives. This should set out how much development is intended to happen where, when, and by what means it will be delivered. Locations for strategic development should be indicated on a key diagram; and
- 3.2 The LTGDC note that although at the Issues and Options stage the Core Strategy needs to define what the main spatial, planning and land use issues for the borough and ways to achieve this. The overall vision should be informed by an analysis of the characteristics of the area and its constituent parts and the key issues and challenges facing them. The Core Strategy should be in general conformity with the London Plan and it should closely relate to any Sustainable Community Strategy or Community Plan for the area. It is noted that the draft core strategy takes the four themes of the Community Plan as its starting point. The strategic objectives form the link between the high level vision and the detailed strategy. They should expand the vision into the key specific issues for the area which need to be addressed, and how that will be achieved within the timescale of the core strategy.
- 3.3 It is essential that the core strategy makes clear spatial choices about where developments should go in broad terms. This strong direction will mean that the work involved in the preparation of any subsequent DPDs is

reduced. It also means that decisions on planning applications can be given a clear steer immediately.

- 3.4 The present 'Options & Alternatives' core strategy does not yet provide a coherent picture of how Tower Hamlets is likely to change during the lifetime of the document, nor map out the key inter-relationships of various land use and transport infrastructure and the opportunities and constraints in the borough to accommodate these effectively.
- 3.5 The Core Strategy should allocate strategic sites for development. These should be those sites considered central to achievement of the strategy. Progress on the core strategy should not be held up by the inclusion of non strategic sites. LTGDC consider that with significant masterplanning and other planning work having taken place, Tower Hamlets has a good evidence base and rationale for allocating key sites and projects in the next version of the Core Strategy. Given the limited scope for alternatives, some of these sites could have been identified in this present draft.
- 3.6 The LTGDC note that whilst it is prudent for the site area to be delineated in outline rather than detailed terms, more precise definition through masterplanning using an area action plan (if required) or through a supplementary planning document (SPD) means businesses and residents have confidence in the way in which the area is likely to develop. Key sites such as Poplar Riverside, Bromley by Bow and the Lea River Park have all been worked up in sufficient detail that their inclusion on a proposals map at the 'preferred options' stage is strongly recommended.

4. Assessment of the Strategy:

- 4.1 The LTGDC is commenting on those areas where it has an interest and on core strategy proposals which could have an influence on the delivery of projects the Development Corporation is undertaking.
- 4.2 **Spatial Vision**
- 4.3 The draft core strategy states that the spatial vision should be one of 'Reinventing the Hamlets', namely from Spitalfields to Poplar and from Canary Wharf to Bow, each should have a distinct identity, role and function and all be well designed, vibrant and good places to live. The LTGDC support this approach. Individual neighbourhoods will engender local pride and supporting centres of varying sizes with a range of appropriate uses will encourages local patronage.
- 4.4 It is suggested that the preferred options Core Strategy should try to differentiate more clearly between thematic policies which are borough wide (such as promoting green roofs) with those projects which can be mapped and represented spatially.
- 4.5 At a strategic level many proposals (particularly those within the LTGDC boundary) are already identified in the London Plan 2008 and Lower Lea Valley OAPF 2007. As such, the Core Strategy will need to accommodate

these where they have a spatial aspect to them (i.e. protected Wharves or Green Grid). Conversely at a more detailed level, significant work on masterplans, particularly in the Leaside area has taken place. The Core Strategy needs to articulate the spatial implications of this work.

4.6 **Overall Spatial Approach**

4.7 The main policy proposal in the document suggests a fundamental choice in how to manage development within the borough, either to distribute development throughout the borough or concentrate growth around existing centres.

4.8 ***Spatial Option A: 'Refocus Upon Our Centres'***

4.9 This option seeks to refocus and reinforce a hierarchy of successful, rejuvenated and well connected centres across the borough. The centres will accommodate shopping, other commercial, housing and civic uses.

4.10 This option would mean focussing activity and uses around existing and new designated centres. These would contain retail, office, civic, leisure and social infrastructure. It is suggested that open space, such as small parks or squares, should also be included in this list.

4.11 Option A suggests that where appropriate, the Borough should focus tall buildings and the highest density (but does not quantify these) in and around centres and improve transport capacity at existing centres. This should include transport accessibility and capacity and apply to proposed new centres.

4.12 ***Spatial Option B: 'Organic Growth Across The Borough'***

4.13 Option B would 'allow organic, development led growth that will facilitate a mix of uses across the borough'. New places would emerge from individual development sites as opportunities allowed, rather than being concentrated in particular locations. This option would maximise the density of new development of each site.

4.14 The strategy states 'new places are created through cumulative development opportunities and allowing tall buildings and development with higher intensity across the borough where is demonstrated to be appropriate and viable'.

4.15 Having reviewed options the LTGDC considers that in terms of better planning, urban design and sustainable development that on balance Option A is preferred. This seeks to focus on existing centres within the borough to reinforce a hierarchy of successful, well connected centres.

4.16 *LTGDC comment: The LTGDC recommend that Option A, is pursued. The focus on regeneration should include the existing and provision for new mixed use centres. With considerable new development underway in the*

Lower Lea Valley there will be the need for new centres to emerge to serve the new communities. For example at Bromley by Bow

5.0 Key LTGDC Projects

5.1 The strategy goes on to discuss in more detail 16 themes for the Borough; a detailed response to this section is in the appendix.

5.2 The LTGDC is working with Tower Hamlets on a number of projects that should be incorporated into the preferred options version of the core strategy. Several other important projects are situated adjacent to the borough boundary these should be acknowledged where they are likely to have an influence on the surrounding area.

5.3 Hackney Wick / Fish Island

5.4 As mentioned in detail in the appendix (in the 'Making Space for Industry' chapter) the strategic role of Fish Island is identified. It would be useful if the location of Fish Island and the other sites were shown more accurately. The sites need to be seen in the context of wider ongoing regeneration. These areas in particular will need to balance the retention of industrial capacity, with the introduction of new uses.

5.5 The emerging Fish Island masterplanning work is looking at the potential for part of Fish Island as SIL: IBP (Industrial Business Park); as well as part as SIL: PIL (Preferred Industrial Park).

5.6 *LTGDC Comment: The draft Core Strategy should recognise the masterplanning work at Hackney Wick. Reflecting emerging work in the next draft strategy would assist in mapping out a land-use canvas of what will be distributed and the form it is likely to take.*

5.7 Olympic Park / Legacy Development

5.8 Despite being outside of the Borough the proposals should be recognised. Although the specifics of the legacy of the Olympic and Paralympic Games are not yet fixed, substantial benefits arising from the Games are known and/or predictable. The park and its environs will accommodate state of the art sport and leisure facilities and substantial employment space developed from the IBC/MPC and will be well-connected to central London.

5.9 *LTGDC Comment: Given the scale of the potential accommodation the IBC/MPC will deliver in legacy mode, the proximity and potential of the commercial space should be at least acknowledged. The Olympic Park will be a major green space and the Core Strategy should develop its spatial portrait at the next draft to demonstrate how it can link into the area as it is of regional significance.*

5.10 **Bromley by Bow**

- 5.11 The LTGDC, in partnership with LBTH, is promoting the comprehensive redevelopment of land at Imperial Street, Hancock Road and Three Mills Lane and undertaking a feasibility study of capacity and integration improvements at Bromley by Bow station. The Core Strategy should acknowledge Bromley by Bow as an area for regeneration and growth that includes the creation of a new centre alongside accessibility improvements to promote and safeguard their delivery.
- 5.12 The LTGDC and LBTH is working closely with public sector agencies and landowners and developers on delivering comprehensive redevelopment to provide a new centre comprising a relocated and expanded food store, complementary retail units, new housing, a new primary school, new employment space and new open space and accessibility improvements across the A12 and at Bromley by Bow station.
- 5.13 A 'Land Use and Design Brief' has been approved for public consultation by the LTGDC Board and LBTH Cabinet. Public consultation commenced on 18 August 2008. The Brief identifies how the area could be developed.
- 5.14 *LTGDC Comment: The overall spatial strategy for the Borough should focus on the hamlets and their centres, as such it would be of considerable benefit if the core strategy therefore recognises the work underway in Bromley by Bow and the proposal to create a new mixed use centre.*
- 5.15 *The revised core strategy needs to reflect the Bromley by Bow proposals more explicitly as they cover issues such as the provision of open space/green grid, social and community infrastructure, retail, employment and housing.*

5.16 **Sugar House Lane and Three Mills (LB Newham)**

- 5.17 Although this site is not within Tower Hamlets, PPS 12 does state that Core Strategies should take into account, where appropriate, proposals beyond the Borough boundary. Sugar House Lane and Three Mills is located adjacent to Bromley by Bow.
- 5.18 *LTGDC Comment: The LTGDC is producing a masterplan that will promote an appropriate distribution of land uses across the site and development and design guidelines. A key component is the creation of bridge crossings between the site and the proposed new centre and station at Bromley by Bow. The Core Strategy should acknowledge Sugar House Lane and Three Mills as a priority for regeneration and growth and the need for development either side of the Borough boundary to be integrated.*

5.19 **Poplar Riverside**

5.20 There are plans by major landowners to redevelop large sites throughout the area, work on providing a planning framework for such proposals are being developed including the Poplar Riverside Implementation Plan. These proposals if agreed should be broadly secured through identification of key sites within the core strategy. In addition the severance and poor residential amenity caused by the A12 and A13 need to be addressed.

5.21 The LTGDC is also working with TfL and the Council to construct a new pedestrian crossing over the Blackwall Tunnel Approach Road; this will enable this isolated area to be better connected with the DLR at Langdon Park. Such interventions should be mapped in the next draft core strategy.

5.22 *LTGDC Comment: The draft Core Strategy mentions the A12 but should map out where interventions can be made. In the next version the LTGDC recommend that where known the re-establishment of the street network rather than estates should be identified. These areas are part of the problem of severance and isolation of part the area from the rest of the Borough and the city.*

5.23 *At Alisa Street land assembly is required to ensure appropriate development of this key riverside location. This is the type of strategic development site that could be identified in the next draft Core Strategy. Similar undertakings at Imperial Street and Hancock Street should address these areas for renewal, even if not down to specific streets or plots.*

5.24 **Lea River Park**

5.25 The Lea River Park is a major project that the Council should support through the planning process. The connections to the park and sites required to deliver it should be further developed at the preferred option stage. This should be clearly indicated with enough scope for flexibility as the design and specification for the park evolves.

5.26 The park's contribution to the East London Green Grid would benefit from being mentioned and connectivity to other green spaces within Tower Hamlets and to neighbouring boroughs should be indicated and safeguarded as strategic spatial proposals. An example being the Leven Road Gas Works site which is identified as a key part of the Lea River Park.

5.27 *LTGDC Comment: The Lea River Park Design Framework (May 2008) shows the detailed sites and infrastructure required to create the park. These sites and likely infrastructure necessary for delivery of the project should be clearly identified in any proposals diagram. Connections to the wider East London Green Grid should also be acknowledged in the next version of the core strategy.*

6.0 Conclusion

- 6.1 The LTGDC welcomes the progress of Tower Hamlets' LDF programme with the publication of their draft Core Strategy 'Options & Alternatives' document. As the preferred option is developed it is important that potential specific projects are identified in broad spatial terms in order to safeguard sites for the delivery of them.
- 6.2 LTGDC consider that the spatial themes and objectives need to be revised to ensure that they demonstrate more clearly how the Council intend to plan for the delivery of homes, commercial space and social infrastructure.
- 6.3 A formal response will be prepared to take into account any comments that the Planning Committee may have arising from this report.

7.0 Recommendations

- 7.1 That committee:
- 7.2 **AGREE** that the comments shown in sections 3, 4 and 5 of this report and appendix (together with any comments added by the Committee) should comprise the basis of the formal response to the LB Tower Hamlets with regard to consultation on the Core Strategy 'Options & Alternatives'.
- 7.3 **GIVE** delegated authority to the Director of Planning to finalise the LTGDC's formal response to LB Tower Hamlets based on sections 3, 4 and 5 of this report and the appendix as amended or supplemented by Committee.

APPENDIX ONE

The core strategy looks at 16 spatial themes based around four headings. Each spatial theme is outlined and where appropriate specific comment from the LTGDC is given in italicised text.

Strengthening Neighbourhood Well Being

- 5.1 **Urban Living for Everyone: ‘To create socially balanced and inclusive communities that provide for a range of dwellings to meet the needs of the community, and to ensure everyone has access to a home, that homes are affordable and they are high Quality and liveable’.**
- 5.2 This chapter deals with housing and contains various options. However, as with other chapters, the options are not mutually exclusive and many can be progressed collectively.
- 5.3 The Development Corporation would support the Council suggestion to establish internal space standards and suggest that the Council ensure new housing schemes achieve a minimum Silver rating in the Buildings for Life assessment. Although these would be best placed within the Council’s proposed Development Management DPD.
- 5.4 *LTGDC Comments: Further work is needed to develop up a clear set of preferred options in order to make provision for sufficient housing of a type and quality that would be in line with our regeneration objectives. There should be a mix of typologies, sizes and tenures, in accessible locations, set within well-designed streets and spaces. The core strategy needs to make provision for reintegrating housing estates back into the urban fabric and complimented with shops, local facilities and open space. The LTGDC would suggest all development proposals must attain a minimum ‘Silver’ rating under the ‘Buildings for Life’ assessment.*
- 5.5 **Supporting Growth with Infrastructure: ‘Ensure that growth is supported by necessary and adequate social and physical infrastructure in the right place at the right time’.**
- 5.6 The strategy mentions the need to support growth with infrastructure and provides some general examples. In addition it specifies the need for four new primary schools and two new health care facilities will be needed in the Leaside area. The LTGDC supports the proposed additional infrastructure and the need for this to be delivered in tandem with housing growth. With limited site availability within the Borough, the general locations where such facilities are likely to be required can be indicated in the strategy. The Site Allocations DPD should then pinpoint the specific plots to be safeguarded through land use designation.
- 5.7 The regeneration of Bromley by Bow is a key area where new infrastructure will assist regeneration. It is proposed to comprise of the

creation of a new centre including new retail, housing, school, employment and open space and should be referenced in the revised strategy.

- 5.8 *LTGDC Comments: The Development Corporation suggest that if Spatial Option A (Focusing on local centres) is to be pursued, the Council should identify the distribution and type of social infrastructure (parks, schools, health centres, police stations and social/community facilities) likely to be replaced or constructed during the lifetime of the core strategy and assess how the location of these facilities can help improve the economic and social vitality of an area. As such the LTGDC suggest that the next draft of the Core Strategy identify the areas suitable to accommodate this key infrastructure. This is necessary to ensure future development proposals do not prejudice the ability to deliver these facilities later.*
- 5.9 *The LTGDC recommend that the chapter should show on a plan what other essential infrastructure (expanded stations, new bridges, new parks etc) is likely to be required and the preferred location This would allow other service providers from utilities companies to the police, NHS and the commercial sector to be able to plan their capital investment and maximise how their property and estates are utilised as part of the wider community. Such a plan would also help inform development control and regeneration decisions and guide later DPDs and SPDs that will be more site specific. Early identification will help secure on site provision or contributions for infrastructure provision.*
- 5.10 *Within the LTGDC area the Planning Obligation Community Benefits Strategy would be utilised for eligible residential development to secure the standard charge and pooled contributions. However, there is still the need for the geographic locations of physical infrastructure to be mapped in order to help guide S106 and other funded capital programmes.*
- 5.11 **Creating Liveable and Healthy Cities: ‘ To promote a healthy community by protecting the environment in which people live, work and play, and to ensure neighbourhoods promote active and healthy lifestyles’.**
- 5.12 The LTGDC supports the principles of improving peoples’ health and wellbeing by interventions in the built environment. A person’s living conditions can be a significant health determinant and as such, decent homes and open spaces are essential.
- 5.13 The stated proposals to improve air quality by planting street trees, identify low emission zones and reduce the reliance on the private car are also supported in principle. The proposals to encourage the creation of urban farms and allotments are also welcomed by the Development Corporation; however the most significant way of encouraging such provision will be for the Council to start to identify sites where the aforementioned proposals can be accommodated.
- 5.14 *LTGDC Comments: The Development Corporation support the principle in the draft core strategy of improving housing, and streets as well as*

creating new leisure opportunities both in and outdoors. It would be useful for the core strategy to map out where refurbishment work is likely or planned to help co-ordinate priority areas for improvement.

- 5.15 **Creating a Green Grid: ‘To create an interlinked network of high quality, accessible open spaces in the borough’.**
- 5.16 The LTGDC suggest that the next three chapters (green grid, blue grid and bio grid) could be consolidated to show the range and distribution of open space and water courses and associated areas of biodiversity and the potential for improvement. Splitting these topics somewhat undermines the interrelationship these elements have.
- 5.17 The option for consolidating and improving open space on existing housing estates (this is an issue common across Tower Hamlets particularly with significant estate renewal proposed). The LTGDC note that here are occasions when consolidation to create better spaces is to be supported. However, unequivocal support for this approach cannot be given as it would depend on a case by case basis.
- 5.18 The chapter mentions the ‘Lower Lea Valley Park’ (this should be amended to read Lea River Park) in the diagram but the successful Mile End Park and other strategic open spaces are not. This provides an unclear picture of current provision and what is proposed and their spatial relationship.
- 5.19 The LTGDC recommend that by mapping these spaces on a plan of the borough it will illustrate where the gaps and opportunities to establish new spaced and improve the green grid are. It will also assist in identifying site specific interventions and will add weight to the protection of sites required for strategic projects such as those needed to deliver the Lea River Park.
- 5.20 The proposals to maximise the opportunity through the redevelopment of estates and the creation of new streets and squares and open spaces is supported.
- 5.21 *LTGDC Comments The Development Corporation would recommend that this chapter should address the topics at a borough wide and then area specific level and by combining the green grid and bio grid chapters would make it easier to understand the interrelationship between these grids.*
- 5.22 *The revised core strategy should identify major sites required to deliver the East London Green Grid and the Lea Valley Park.*
- 5.23 *The LTGDC support many of the generic proposals in this chapter, but caveat that clearly a solution must be appropriate for its location. As such, the Development Corporation support creating green streets, planting street trees, and creating green roofs, furthermore the creation of new large open spaces, new play space and establishing green linear parks along waterways, are also welcomed in principle.*

- 5.24 **Creating a Bio Grid: ‘To create an interlinked network of areas rich in bio-diversity and wildlife’.**
- 5.25 The LTGDC support proposals for improving and expanding areas of bio-diversity. This is an important topic and should be integrated and shown on plan to with open space and water ways to identify where the various grids connect and where new connections and spaces can be made.
- 5.26 *LTGDC Comments: The proposals for a bio-grid of spaces and connections are welcomed. As part of redrafting the next version of the Core Strategy the need for this subject to be divorced from the ‘green grid’ and the ‘blue grid’ should be reconsidered.*
- 5.27 **Creating a Blue Grid: ‘To create a network of high quality, accessible and useable water spaces and to reduce the risk of flooding’.**
- 5.28 The chapter suggests that new docks and basins and routes could be created, whilst the principle is laudable there are limited located where this is feasible and in the preferred options stage areas where these could be created will need to be explored if the concept is to be taken forward. The Development Corporation suggest that possible locations and the barriers to their creation should be identified. The proposals for a continuous Thames path is supported by the Development Corporation and this would accord with London Plan.
- 5.29 The LTGDC note that on the accompanying diagram regarding Fish Island East, it states “resists development in areas with an actual risk of flooding”. This should be clarified, the topography of London means that a considerable amount of the city is at relative risk of flooding. The statement needs to be amended to ensure that the likelihood of flooding is minimised though design and location of development and improvements to water courses.
- 5.30 *LTGDC Comments: The Development Corporation support the stated principle for introduction of sustainable urban drainage systems and note these along with other measures should be part of major developments where there is a need to mitigate the likelihood and impact of flooding.*
- 5.31 *The LTGDC support the proposals to improve the waterways, mooring sites and access to them. The chapter also proposes to capture rainwater and secure water neutral development; the Development Corporation supports these in principle.*
- 5.32 *The specific reference to Fish Island be amended to allow for appropriate development which makes provision for its flood risk location.*
- 5.33 **Dealing with Waste: ‘To manage and treat the Borough’s waste sustainably, minimising the amount of waste produced and maximising recycling’.**

- 5.34 Tower Hamlets is at present a Unitary Authority for waste management. The stated principle of treating the Borough's waste more sustainably by minimising the amount of waste produced and maximising recycling is welcomed. The LTGDC suggests that, in addition to these principles, where waste cannot be recycled, it should be bio-degraded or the energy recovered from it where possible.
- 5.35 The Development Corporation note that there is the need to replace the waste transfer facility at Alisa Street in order to achieve an appropriate redevelopment of the wider area. The facility, due to the London wide waste allocations, will need to be relocated within the borough in order to minimise lorry journeys to outlying facilities. Suggested replacement site(s) should be identified in any future Site Allocations DPD (as the Borough is not producing a Waste DPD). The precursor to this is to identify broad locations where such a facility would be appropriate in the Core Strategy.
- 5.36 *LTGDC Comment: Alternative waste management sites need to be identified in broad terms in order to secure longer term provision.*

Enabling Prosperous Communities

- 5.37 **Delivering Major Successful Employment Hubs: 'To support our major employment hubs with excellent access for local residents and to support a strong and dynamic economy which deliver a range of jobs and opportunities for local people'.**
- 5.38 This section appears to deal with employment solely based on office development. The LTGDC are concerned that the reference primarily to 'large floor plate office activity' is not helpful as there are other types of employment generators that are likely to be as important for local residents. The Development Corporation would recommend that the Borough spatial planning reflects the needs of all employers. The Borough should support a range of economic sectors which will broaden the employment base and therefore maximises local employment opportunities. Retail, hotel and hospitality, and smaller-scale flexible office spaces will provide a greater choice of employment opportunities and be more robust by not over-relying on a particular commercial sector in times of economic uncertainty.
- 5.39 The LTGDC support the principle of improving east - west connections between Olympic facilities and the wider area and note that the IBC/MPC and Stratford City could become a significant employment hub – the context of these major developments and access from the eastern edge of the borough should be indicated in the preferred options draft strategy.
- 5.40 *LTGDC Comment: The LTGDC recommend that the Core Strategy (as mentioned in section three of this report) should be identifying employment clusters and growth areas and this should be included in the next draft. For both commercial space and housing, a diagram is needed to fully*

explain likely development and renewal for the next 15 years. The Development Corporation support the idea that the Core Strategy should utilise the existing Hamlets and it suggests using these existing and emerging commercial centres, to map out likely business growth, retail and social facilities and the opportunities for commercial clusters (i.e. Bromley by Bow for creative industries and Canary Wharf for large plate offices and HQ office buildings).

- 5.41 **Making Space for Industry: ‘To support a range of new businesses and economic sectors, with a particular focus on research & knowledge, innovation & technology, service, green/eco and creative and cultural sectors’.**
- 5.42 The London Plan table A2.1 identifies two Strategic Industrial Locations (SILs): Fish Island and Empson Street / Gillender Street. The emerging Fish Island masterplanning work is reviewing the present SIL boundaries. Fish Island and its role as a SIL will continue and there may be the potential for an IBP (Industrial Business Park), as well as a PIL (Preferred Industrial Location) in the area. The draft core strategy should reflect the conclusions from the masterplanning work.
- 5.43 The Gillender Street designation generally accords with the Lower Lea Valley OAPF, (See Sub Area 12: Poplar Riverside) which identifies the area as ‘Other Industrial Areas’. The LLV OAPF states that ‘Other Industrial Areas’ have potential to accommodate a proportion of non industrial uses whilst still maintaining existing industrial capacity; or that are wholly new industrial areas in which industrial uses could be mixed with other uses, subject to the industrial use being the primary use. It goes on to state that non-industrial uses could be introduced into such an area without incurring an overall net loss of industrial capacity through more efficient use of sites, by, for example, the reduction in site area occupied by an industrial development through the more compact arrangement of facilities on a site, stacking the industrial facilities, enabling the release of land for other uses and / by using the site in a way that increases employment activity on the site. The LTGDC support the designation and recommend that this is more clearly reflected in the next draft core strategy.
- 5.44 *LTGDC Comment: The LTGDC recommend that this topic be incorporated within the employment chapter to provide a more balanced picture of employment proposals. With the London Plan identifying the Borough as one where industrial land can be consolidated and surplus released for alternative use. The spatial options of the borough here are limited as the Core Strategy must be in general conformity with the London Plan. The Core strategy should reflect the emerging proposals for Fish Island and marry these with Industrial land consolidation.*

- 5.45 **Encouraging Tourism: ‘To support and encourage the growth of tourism in Tower Hamlets’.**
- 5.46 The ‘encouraging tourism’ chapter, whilst welcomed by the Development Corporation as an area for potential employment growth, is just one of many business sectors. It is important the Core Strategy accommodates not just tourism as a commercial sector.
- 5.47 As tourism during the London Olympiad is likely to increase, tourists spend and commercial opportunities need to be developed to capitalise on this. The draft core strategy at present suggests options for hotel locations and ‘encouraging tourism’ and ‘enhancing the tourism offer and opportunities arising from the Olympic and Paralympic Games’.
- 5.48 *LTGDC Comment: This chapter could be more specific and where possible identify how this will be achieved (tourist trails, improved pedestrian routes and refurbished public spaces, new attractions etc) through physical and spatial interventions. The LTGDC note that High Street 2012 is shown on the diagram but with no real context or explanation of its role.*
- 5.49 **Growing Creativity and Culture: ‘To support a range of new businesses including small and medium enterprises, with a particular focus on research & knowledge, innovation & technology, service, green/eco and creative and cultural sectors’.**
- 5.50 The Development Corporation recognise the value of the creative sector in long term regeneration and it remains a growth employment sector. Therefore the core strategy proposal to encourage provision of studio space and workspace through planning obligations is supported. Additional proposals to protect clusters are supported in principle however it is suggested that the core strategy could outline these clusters and where these can be supported and expanded. These can then be better protected (through the Site Allocations DPD, or an SPD for particular creative industries quarters).
- 5.51 *LTGDC Comment: The LTGDC strongly recommend inclusion of an employment map (of the entire borough identifying clusters for offices, general business, retail centres, cultural industries and other business sectors) would be useful in the next version of the strategy. This would be a more comprehensive approach to planning the development of these disparate but often interrelated commercial networks.*

Designing a High Quality City

- 5.52 **Making Connected Places: ‘Ensure people can easily and equally access places for work, learning, leisure and services both within and outside the borough’.**

- 5.53 The draft core strategy identifies the need to reduce severance caused by roads and rail infrastructure; this is supported by the LTGDC. Several projects undertaken by the Development Corporation are seeking to do this. It would be useful at preferred option stage, that those areas of severance and proposals for resolving this are identified (i.e. decking/land bridges, foot bridges or tunnels etc). The suggestions for improvements to the A12 are welcomed and the Development Corporation feels that the degree of severance is such that significant interventions to improve the present situation are necessary to help unify key parts of the Borough.
- 5.54 The principle of improving public transport accessibility in growth areas including Bromley by Bow, Bow Common and Poplar Riverside is supported by the Development Corporation, however it is noted the Strategy doesn't suggested actual ways to achieve this. The chapter makes numerous suggestions on transport all of which can be supported in principle.
- 5.55 *LTGDC Comment: The development corporation support reconnecting the street network to improve integration of places and reduce the impact of estates which can be perceived as territorial. In particular the Development Corporation welcomes the proposal to create new and improve existing connections from Tower Hamlets to Stratford and the Olympic Park. Again, the way that this will be achieved is not identified.*
- 5.56 *The Issues and Options Core Strategy should be where the pros and cons of each approach is laid out, such as land take, loss of housing or creation of new decked open space etc. The revised strategy should show the priority areas for improvement including proposals that are likely to be implemented during the lifetime of the plan (such as the new footbridge crossing the Blackwall Tunnel Approach Road and connections through Lea River Park both of which are being supported by the LTGDC).*
- 5.57 **Creating Attractive and Safe Streets and Public Spaces: 'To create people-friendly, attractive, cohesive and safe streets and public spaces'.**
- 5.58 This chapter of the core strategy suggests several proposals which in principle are to be welcomed. New pedestrian and cycle routes, a cycle hire scheme along with redesigned pedestrian friendly streets are proposed and the LTGDC would support these as part of a public realm strategy for the Borough. As the core strategy suggests this should seek to compliment the work of High Street 2012. It should enhance local characteristics, coordinating across the different areas, rather than be developed in isolation.
- 5.59 The LTGDC would add that as part of safer public realm it is important to ensure a reasonable level of activity. Main pedestrian routes should retain active ground floor uses and development should not be set back from the pavement this undermines the visual appearance the street and reduces natural surveillance and activity. The preferred options stage should address areas where improvements between centres can be made and

where additional active uses and highway works would improve pedestrian connectivity and local vitality.

- 5.60 *LTGDC Comment: At the preferred options stage the ‘new pedestrian routes which connect key destinations and centres’ should be identified on plan so development can take into account these wider proposals.*
- 5.61 *That the proposals for ‘High Street 2012’ are progressed and where necessary the core strategy reflects the likely connections necessary to facilitate delivery of this key project.*
- 5.62 **Creating Distinct and Durable Places: ‘To create a network of interconnected places that support positive local identity, character and a strong sense of place and to promote a borough of high quality, durable and robust buildings’.**
- 5.63 The LTGDC supports all the principles in this section (including protecting buildings and their setting that contribute to the character and identity of the place and ensuring buildings are of the highest quality). These raise the importance of enhancing local identity and character and improving quality of design but it is not clear how these would be implemented. The Development Corporation support the target that all development should adhere to the principles of the Buildings for Life assessment. However this policy option would be better located in the proposed Development Management DPD.
- 5.64 *LTGDC Comment: This chapter and the preceding on ‘Creating Attractive and Safe Streets and Public Spaces’ could be merged to provide a comprehensive approach to the public realm and the buildings within it.*
- 5.65 *The Development Corporation support the target that all development should adhere to the principles of the Buildings for Life assessment and suggest that development project should not generally be approved unless they achieve ‘Silver’ under the assessment.*

Tackling Climate Change

- 5.66 **Creating a Renewable Energy Grid: ‘To create a renewable energy grid across the borough in order to achieve a low carbon borough by 2025 or to achieve a zero carbon borough by 2025’.**
- 5.67 The core strategy suggests a renewable energy grid in order to reduce the significant loss of energy transferred across the national grid, The Development Corporation support the aspiration to create such an energy distribution grid. The proposal to achieve a “zero carbon borough” by 2025 is laudable but there is no evidence to show how this is to be achieved.
- 5.68 The LTGDC would caution again advocating the use of biomass for energy generation per se. The use of bio-mass fuel does not necessarily

make energy generation sustainable. It is suggested that the Core Strategy support 'renewable energy' but not specify 'using biomass to create energy' as the overall 'renewable' credentials of bio-fuels are not proven, due to the production of some fuels from unsustainable sources.

- 5.69 *LTGDC Comment: That the chapter be revised support all types of renewable energy where appropriate. It might be prudent to merge this chapter with the following one which also deals with energy and moving towards a low carbon economy, as energy and reductions in CO2 are interrelated*
- 5.70 **Working Towards Zero Carbon Built Form: 'To ensure the built form of the borough is zero carbon in order to achieve a low carbon borough by 2025 or to achieve a zero carbon borough by 2025'.**
- 5.71 The LTGDC note that the proposals identified in this section are welcomed; albeit that the heading above is contradictory offering one proposal which results in two outcomes.
- 5.72 Most of the proposals are complimentary and not mutually exclusive, so there is not a definitive choice or option to select. Furthermore some proposals in this chapter including "adopting the Code for Sustainable Homes" are now mandatory and cannot be considered an option. Proposals to "require zero carbon commercial buildings" while laudable may discourage the commercial sector from locating or investing in Tower Hamlets if this was persuaded in isolation of neighbouring London Boroughs.
- 5.73 *LTGDC Comment: The LTGDC suggest that this and the preceding chapter are merged to provide an holistic approach to carbon usage and climate change. It is important that there is a spatial element to the proposals and options are those within the remit of what the planning system can deliver. The move to minimise carbon emissions arising from development and building is supported in principle.*

End.