

Planning Committee Report

London Thames Gateway Development Corporation

Tower Hamlets Development Plan Document Consultation (Sites and Placemaking, Fish Island Area Action Plan, Development Management)

Report of the Director of Planning

1 Purpose of this report

- 1.1 This report sets out the proposed LTGDC response to the London Borough of Tower Hamlets Development Plan Documents (DPDs), Engagement Drafts, which have been published for public consultation. They are available to view on the Tower Hamlets website: http://www.towerhamlets.gov.uk/lgs/851-900/855_planning_consultation.aspx. As the LTGDC does not have policy or plan making powers, it is essential that the interests of the Corporation are reflected wherever possible in emerging planning policy of constituent boroughs to assist in the delivery of the Development Corporation's objectives.
- 1.2 The LTGDC Planning Committee has responsibility for considering policy documents and providing LTGDC's formal response.
- 1.3 A draft response to each of the three consultation documents published is attached at Appendix A, B and C to this report.

2 Recommendation

- 2.1 That the Committee **Agree** that the Director of Planning respond to the consultation with comments as set out in Appendix A, B and C and any additional comments made by members at the meeting.

3 Background

- 3.1 The Tower Hamlets Core Strategy was adopted in September 2010.
- 3.2 The council is preparing a number of other documents to form its LDF, and is currently consulting on:
- 3.3 **Sites and Placemaking DPD** – this will allocate sites needed for new infrastructure (including schools, health facilities, leisure centres and Idea Stores) and larger scale housing developments.

- 3.4 **Fish Island Area Action Plan** – this will help shape the regeneration of Fish Island, providing new homes and jobs and connecting Tower Hamlets with the wider Olympic Park legacy and proposals for the Hackney Wick hub area.
- 3.5 **Development Management DPD** – this will set out policies to ensure individual development proposals will help to deliver the core strategy vision as well as respond appropriately to their local surroundings.
- 3.6 The consultation documents are marked ‘Engagement Document May 2011’. This is not a statutory stage in the preparation of the documents. It is intended to be an informal engagement consultation, seeking early involvement from stakeholders and the public in preparation of the documents. The Tower Hamlets Local Development Scheme indicates that responses will be reviewed and analysed, and submission documents worked up. Further consultation will take place prior to submission in the Autumn. The scheme anticipates the documents being submitted in April 2012, and the documents being examined in Autumn 2012 and adopted in April 2013.
- 3.7 A proposals map is not published as part of this consultation exercise, although the boundaries shown in the Sites and Place Making DPD (updated following consultation) would be incorporated into the proposals map that will be prepared for the submission version of the documents.
- 3.8 This report has 3 appendices. Each appendix concentrates on each of the engagement draft DPDs in turn, with a short summary of the document at the beginning, followed by a suggested LTGDC response.

Appendix A – Sites and Placemaking DPD

Appendix B – Fish Island Area Action Plan

Appendix B1 – Heritage advice to LTGDC from independent consultant

Appendix C – Development Management DPD

Appendix A: Sites and Placemaking Development Plan Document

1 Summary

- 1.1 Given the great number of potential redevelopment sites in Tower Hamlets, the document only seeks to allocate sites for large-scale housing development (500 units and above) and for key services such as schools, open space, health facilities and Idea Stores, to support the increase in population and employment across the Borough. To support these allocations the document will also define Spatial Policy Areas for the implementation of Core Strategy and Development Management policies as well as guidance for placemaking elements such as public realm improvement areas.
- 1.2 Of the 31 sites identified, 8 are within the LTGDC area. These sites are
- 9 Fish Island Area Action Plan
 - 13 Bow Locks
 - 14 Bromley by Bow Redevelopment
 - 19 Ailsa Street
 - 20 Leven Road Gasworks
 - 21 Sorrel Lane
 - 22 Lea Mouth Peninsula
 - 24 Blackwall Reach Regeneration Project
- 1.3 For each of the sites the DPD includes two pages of text and map, with words under the headings:
- What are the possible uses for the site?
 - What does the suggested site look like?
 - Why have these uses been suggested for this site?
 - What does the adopted Core Strategy say?
 - What is the site and surrounding area like?
 - What needs to be addressed to deliver the site?

2 Suggested response

- 2.1 Although the document does identify town centre, strategic industrial land and local employment area spatial policy areas, it seems strange that employment or retail uses are not included as uses that need to be allocated site choices. This should be reconsidered, especially as it appears to result in the Bromley by Bow redevelopment not being allocated a site choice of retail, when it is the new district centre.
- 2.2 An omission appears to be the identification of the Leamouth South site. There are no other sites in the LTGDC area that have not been identified which LTGDC consider should be identified.
- 2.3 Generally, although the descriptions for the sites do not say anything particularly damaging, the text as written does not guide development or give enough information to properly inform the reader of what they will

need to do to ensure that planning permission for proposed uses would be granted, and what the important material considerations are.

- 2.4 There is no description of relevant planning history on the sites. Tables at the back (effectively a print off from the Council's planning application database) provide a list of the planning decisions for each site. However, there is no commentary or sifting of relevant decisions, or any indication of whether planning permissions have been implemented. This is disappointing, as for a number of sites, including the Bromley By Bow Redevelopment, Leamouth Peninsula and Blackwall Reach Regeneration Project, there are recent decisions/definite proposals which show the form and types of development which would be acceptable on the sites, and how the requirements could be met. Although it is recognised that not all planning permissions will be implemented, reference to relevant existing planning permissions is essential to inform understanding of the development context of the site, and the material considerations that flow from them. This is particularly relevant given the rather generic proposals for some of the sites e.g. several are allocated for primary or secondary schools or district heating centres when clearly not all are required yet no weighting or indication as to which Tower Hamlets consider to be most suitable for particular uses is provided. It may be that the documents have deliberately been drafted to be unspecific, to encourage engagement and input into the next draft. Even if this is the case, LTGDC officers consider it is important that the next version is updated to address the points made above.

3 Specific comments on sites

3.1 9 Fish Island AAP

- 3.1.1 Employment uses are not listed as a possible use for inclusion within the AAP, which is anomaly given that part of this area is proposed to be retained as Strategic Employment Land. See also comments on the AAP consultation.

3.2 13 Bow Locks

- 3.2.1 Under 'what are the possible uses for the site – the site is not within the Bromley by Bow Land Use and Design Brief area.
- 3.2.2 Under 'Why has this use been suggested for this site?' it states by 'conforming with adopted planning policy guidance' what is this adopted guidance? Tower Hamlets officers have said this refers to the Adopted Core Strategy Area of Search for a secondary school, in which case the text should be updated to reflect this. Planning policy guidance is normally used to refer to Planning Policy Guidance notes issued by national government before Planning Policy Statements were used. It would also be helpful to explain in more detail why the site is suitable for a secondary school in terms of the Department for Education Bulletin referred to – is this because of size, proximity to residents, land ownership?
- 3.2.3 Under 'What is the site and surrounding area like?', it may be useful to explain the background as to what the site was before it was cleared land and how long it has been vacant. The Bromley by

Bow development is to the north, beyond the railway lines, but immediately to the north is the Twelvetrees Crescent area, including a hand car wash business (although there is a current application for a hotel on this site), vacant land owned by the LDA, a housing estate and the railway lines. The site is triangular, so the River does not run along its south border, the Limehouse Cut runs along the south east border with the River Lea to the east of that.

- 3.2.4 Should explain what needs to be addressed to deliver the site – is it not relevant what funding there may be available to deliver the site as a school or for a district heating facility? ‘As a secondary school’ could be added after the first word Development. Where would funding come from to implement the required accessibility improvements? Are not routes across Twelvetrees Crescent also important?
- 3.2.5 Is part of the reasoning for this site being identified as a school that of close geographical location to the pupils that it is needed to serve?

3.3 **14 Bromley by Bow Redevelopment**

- 3.3.1 The address should also include Imperial Street.
- 3.3.2 What are the possible uses for the sites – retail uses and other uses associated with the new district centre should be included, as well as employment uses.
- 3.3.3 Reference to the Bromley by Bow masterplan 2006 is not necessary given that this document wasn’t adopted and the Adopted Land Use and Design Brief covers the whole of this site. Primary school – it may be useful to suggest which elements of the requirements the site meets – is it the site size or location?
- 3.3.4 In relation to what does the Core Strategy say, should there be some reference to planning permission having been granted for these uses? The existence of the planning permission is an indication of the type of development that is acceptable, and which meets the requirements set out in policy.
- 3.3.5 In relation to What needs to be addressed to develop the site, suggest deleting the phrase ‘development would be subject to’ as this is confusing and appears to only relate to improved walking and cycling routes and the impact of the A12. Reference should be made to the need for comprehensive development, and that land for a primary school, public open space and a riverside walk would be required.
- 3.3.6 Given the importance of this site, the text should be a lot more specific and go into more detail about what would be required. Suggest that this section is completely rewritten.
- 3.3.7 Conservation Area should be shown on the site plan.

3.3.8 Title for the site plan should be changed to “What is the boundary of the site” or similar, as the site plan doesn’t actually show what the site looks like.

3.4 **19 Ailsa Street**

3.4.1 Should there be a cross reference to the Bow Locks site? It seems strange that it is being suggested that a secondary school could be provided on both sites. Potentially the Ailsa Street site could be more suitable for a secondary school than Bow Locks, given that there will be a crossing over the A12 at Lochnagar Street but should also refer to challenges regarding delivery of the site.

3.4.2 It would be useful if more detail were provided on what the known requirements are that the sites meet for primary and secondary schools. Is it primarily the size of the site or location?

3.4.3 Why is the waste management facility / district heating facility mixed in together?

3.4.4 What is the site and surrounding area like? This is an inadequate description of such a large site. The document storage facility that operates from a larger former old tram shed is not mentioned. The listed buildings are described as adjacent to the site, although they are within the red line boundary shown. Also, the Bromley Hall building is grade II* not grade II listed. The listed buildings should also be referred to by their statutory descriptions, Bromley Hall and Poplar Public Library.

3.4.5 There is no mention of increasing the public transport accessibility of the site. This would be a precursor to the site being acceptable for residential use. LTGDC’s A12 study suggested a new bus route through the site being provided.

3.4.6 Does the proximity of the gasholders have implications for the acceptability of a primary school, secondary school or residential on the site?

3.4.7 The text fails to mention the status of the waste transfer station, the enforcement notice for which requires the use to cease by October 2012. LTGDC’s understanding is that when the use ceases, the land will no longer have an authorised use, and any application would be assessed on the allocations within this document or the use that operated before the waste transfer station. Therefore, there could not be a requirement to keep a waste use on the site, based on London Plan policy.

3.4.8 The text should reference the crossing at Lochnagar Street, which will soon be completed. Reference to this should be positive, as it will open up the site to the surrounding area.

3.4.9 What needs to be addressed to deliver the site: this section ignores the reality of the currently fragmented land ownership. A cross reference should be made to the need for comprehensive development to come forward (as under ‘what are the possible uses for the site’) and that the landowners should work together to

bring forward development. There should be a reference to using CPO powers if necessary. Reference should also be made to the need to ensure that any development's impact on the setting of the important listed buildings, Bromley Hall and the old Poplar Library is acceptable. It should be noted that the Bromley Hall was previously thought to be the gatehouse to Bromley Manor, but it has now been established by the Museum of London that it is the main hall itself built between 1482 and 1495.

3.4.10 Would a riverside walk be required? Would public open space be required? What level of employment use would need to be retained on the site?

3.5 **20 Leven Road Gas Works**

3.5.1 The way this whole section is written doesn't clearly set out that the main part of the site is to be allocated as strategic public space for the east of the borough, and that any residential development is enabling development to help provide the new park area. Mention could be made of how the Lea River Park (Fatwalk) is proposed to link to the site i.e. Poplar Reach bridge is proposed to land on the most northerly corner of the site. The phrase 'the earliest indicative date the site can be released for development' is also unclear, it would be clearer to refer to the gas works being currently programmed to be decommissioned in 2016. The River Lea is to the north west and north east of the site and runs along the boundary. Isn't the planning permission for the car pound temporary? Reference should be made to the need to provide riverside walks as part of development, and to integrate with the Lea River Park proposals.

3.5.2 This SPD should be refining what the Core Strategy says for individual sites, and the reasoning behind the allocation for park use, rather than for the other uses for which this site is within an area of search i.e. waste management facility, primary school and a combined heat and power plant, should be clearly set out. The allocation of the site for public space is supported by LTGDC and planning permission has been granted for public access along the route of the Lea River Park Fatwalk along the north-eastern boundary of the site..

3.5.3 The site description would benefit from describing in more detail the existing uses on the site and how much of the land they take up.

3.6 **21 Sorrel Lane**

3.6.1 LTGDC is unconvinced that this site is suitable for a primary school given local environmental conditions, including traffic noise and accessibility to the local population.

3.7 **22 Leamouth Peninsula**

3.7.1 Again, it would be useful to explain more about the history of the site. For instance that the land used to be used as a margarine factory, but has been cleared and decontaminated in preparation

for development. Planning permission was granted for redevelopment of the site in 2007. This permission wasn't implemented and a new application has been approved subject to completion of the s106 agreement which is expected imminently. Reference should be made to the need to provide new riverside walks and landscaping to reflect and link into the Lea River Park. At present the description including possible uses is too general, given the detail that is available for the site and how this would affect what the site could be used for. This section should say what uses would be required as part of a mixed use development.

3.8 24 Blackwall Reach Regeneration Project

3.8.1 The south east part of the site, east of Blackwall DLR station and the Blackwall tunnel Approach is within the LTGDC area. The text should reflect the fact that an application is expected shortly, following extensive local consultation. The text should also reflect the range of uses that will be required to come forward.

4 Comments on Suggested Spatial Policy Areas

4.1 Bromley by Bow District Centre

4.1.1 LTGDC consider that the boundary for the District Centre needs to be considered more carefully and reviewed. It would probably be appropriate for the boundary to be more tightly drawn around the uses appropriate to a district centre as set out in PPS6, page 30. i.e. the supermarket, other retail, other non retail services such as banks, building societies and restaurants and the new library and exclude the new housing. It would also be worth considering whether the district centre should be planned to expand beyond a tight boundary within the life of the plan. There is a good argument for having a tight boundary in the shorter term to establish the centre within a smaller area, but in the longer term the boundary may need to be allowed to grow, perhaps to the north or around the improved Bromley by Bow Station. Are Tower Hamlets planning to define primary and secondary shopping frontages in centres as set out in PPS6?

4.1.2 NB The index at pages v and vi just refers to all these centres as "town centre" yet text classifies them as major, district, neighbourhood. Should there not be consistency given designation has specific implications re scale and types of uses? Also, where is there an explanation of what these different categories of centres comprise?

4.2 Hackney Wick Neighbourhood Centre

4.2.1 LTGDC support the neighbourhood centre in Hackney Wick.

4.3 Aberfeldy Neighbourhood Centre

4.3.1 The plan shows what is the current boundary of a centre which is being reviewed as part of an ongoing master planning exercise. The results of the masterplanning exercise should therefore be fed

into the next version of this DPD and the boundary amended as necessary.

4.4 Poplar High Street Neighbourhood Centre

4.4.1 The boundary needs amending to reflect current proposals for the Blackwall Reach project, and should not include so much of the public highway (Preston's Road).

4.5 Fish Island Strategic Industrial Location

4.5.1 LTGDC support the suggested boundary.

4.6 Gillender Street - Local Industrial Location

4.6.1 LTGDC support the suggested boundary.

4.7 Blackwall – Local Office Location

4.7.1 LTGDC support the suggested boundary.

4.8 Transport Interchange Areas

4.9 Generally LTGDC support the designated Transport Interchange areas, and consider that the boundaries generally reflect the public realm improvements that should come forward in the areas around the transport interchanges.

4.10 What isn't addressed through the Sites and Placemaking DPD however is how specific accessibility improvements required for some of the particularly isolated sites can be brought forward. Getting over barriers such as the A12 and the River Lea and to the interchanges is the challenge from many areas, rather than improving interchange within a tightly drawn boundary around a station.

4.11 Specifically, LTGDC consider that the Bromley by Bow Transport Interchange Area could be extended further to the east, to incorporate the walking routes within the new District Centre.

Appendix B

Fish Island Area Action Plan

1 Summary

1.1 The AAP sets out a vision which describes the kind of place that Fish Island could be in the future. The AAP aims to strike a balance between regeneration and conservation that will deliver at least 2000 new homes – including a substantial provision of affordable and family housing – alongside space for business and innovation, with new schools, open space and health facilities.

1.2 The document is structured as follows:

1 Setting the Scene – providing the background to the document and describing Fish Island

2 A vision for Fish Island – this sets out a comprehensive vision for Fish Island and its future, its role within Tower Hamlets, the Olympic Legacy and London as a whole.

3 Connecting Fish Island – sets out the connectivity issues, a connectivity strategy, how this will be delivered, and better public transport that is needed.

4 Creating new homes and jobs – sets out the AAP strategy for providing a balanced mix of uses, with Strategic Industrial and Local Industrial Location in Fish Island South, with mixed use residential led regeneration in Fish Island North and East (adjacent to and north of the Hertford Union Canal and adjacent to and east of the Lea Navigation).

5 The hub – a new neighbourhood centre – this section sets out how Fish Island North, in the area around the station would be designated as a Neighbourhood Centre and the creation of a 'Hackney Wick Hub' will be encouraged (which is also encouraged by planning policy north of the railway line in London Borough of Hackney).

6 Creating a high quality environment – this section sets out how regeneration in Fish Island should contribute to creating an attractive and safe environment, well integrated with the historic environment, encompassing the highest quality sustainable urban design, architecture and open spaces. This section invites comments on a suggestion to designate a conservation area in Fish Island North around White Post Lane. The section also sets out what new public space may be required, a waterspace strategy and proposed public realm improvements.

7 Achieving sustainable development – sets out how development needs to achieve certain standards e.g. BREEAM code for sustainable homes, talks about the need to designate a site for a waste to energy facility, energy efficiency and use of the Olympic Energy Centre and managing flood risk.

2 Suggested General Comments

2.1 Generally, officers consider that LTGDC should support this draft document (with the exception of the proposed conservation area – see

comments below at 3.13 and 3.14). However, this support should be given on the basis that the document is a consultation draft, the next version of which will firm up on a number of issues and be more specific. At present, there are a number of key issues, such as designation of open space sites and a waste to energy facility, resolution of which is left to later versions of the document, and LTGDC consider this next version of the AAP needs to be published quickly to be as useful as possible for guiding development in the area.

- 2.2 It is difficult in parts of the document, e.g. in the connectivity section, to tell which proposals are visionary, which sections are proposals that have been extensively studied but are not ever likely to be feasible, which are actually likely to be implemented etc. In some cases it would be useful to refer to other studies within the document, such as LTGDC's A12 Capacity and Access study when discussing the A12. The next version of the document, should set out how many of the options e.g. at 3.17 are likely to be taken forward, how they would be funded, and whether they are required as part of particular development proposals.
- 2.3 Should there be particular sites identified in this document with uses allocated? There seem to be very few detailed maps in this document, whereas given the size of the area, and because it is an area action plan, it could be more specific. No site allocations appear to have been made within the document for individual sites. LTGDC consider that the next version of the AAP should be more specific.

3 Specific comments and responses to consultation questions

- 3.1 Comments on each of the sections are set out following the format followed in the document, with responses to consultation questions where asked.

1 Setting the Scene

- 3.2 Opportunities and challenges – could add or give more emphasis to retaining a level of industrial / employment floorspace, both within the SIL and across the Fish Island area, to support the agglomeration of existing businesses in Fish Island.

2 A vision for Fish Island

- 3.3 Page 17 – a map showing the character areas would be useful.
- 3.4 Support this vision section although it is quite long. (NB there are no specific consultation questions on the vision).

3 Connecting Fish Island

3.5 It would be useful if the options on page 28 were numbered and marked on the plans.

3.6 Are the interventions listed on pages 28-30 those that are shown in table 3.1 and figure 3.3?

3.7 Connecting Fish Island Consultation questions

a) *Do you agree with the proposed improvements to connections?* Yes, although the type of connectivity improvement that is made to White Post Lane bridge will depend on whether a conservation area is designated that includes the bridge

b) *Are there others that should be included?* No

c) *What should the priorities for implementation be?* Priorities for implementation will depend in part on the timescale for development coming forward, and the funding that is available and any restrictions on how funding can be used.

d) *Do you agree with the proposed public transport improvements?* LTGDC fully support the improvements to Hackney Wick Station, and the measures set out in the DPD to improve bus links to the station.

e) *Are there others that should be included?* No.

f) *How should key connections be funded or delivered?* Funding or delivery will be determined by the type of connection. Some would need to be required when existing sites are redeveloped, and the AAP should clearly set out which these are, and provide a clear rationale for why they are required. Generally connections will be funded through a mix of public, private and section 106 funding. Reference to LTGDC's planning obligations community benefit strategy, and the Lower Lea Valley Pooled Fund monies should be made in the document, as the pooled fund could be an important source of funding for some of these projects.

4 Creating New Homes and Jobs

3.8 Support the Local Industrial Location designation and the retained SIL designation in Fish Island South. However, the way the LIL is shown on fig 4.1 could be clearer so that it is clear exactly which area will be covered by the designation.

3.9 Page 45 – creating sustainable neighbourhoods. This section sets out the options identified for provision of supporting infrastructure, including schools and primary health care facilities. However, it is unclear from the

way this section is written how Tower Hamlets will decide on the policy options set out for these new facilities, or when or how a decision will be made on whether and where new school or primary care sites will be required. The next version of the AAP should be much firmer on the actual requirements, backed up with appropriate evidence.

3.10 **Creating new homes and jobs consultation questions**

- a) *Do you agree with the approach to consolidating SIL in Fish Island South? Yes*
- b) *Do you agree with the approach to managing the release of sites previously within SIL? Yes*
- c) *Do you agree with the proposed introduction of a Local Industrial Location in Mid Fish Island? Yes*
- d) *Do you support the focus on residential development in Fish Island north, east and water front locations in mid Fish Island? Yes*

5 The Hub – a new neighbourhood centre

3.11 No comments on this section except that at 5.21, the next version of the plan should more clearly express that the new link across the Hertford Union Canal to Wyke Road will be required as part of any redevelopment of the industrial uses.

3.12 **A new neighbourhood centre – the hub consultation questions**

- a) *Do you agree with the proposed boundary for the Hub core area? Yes*
- b) *Do you agree with the proposed mix of uses? Yes*
- c) *Do you agree with the proposed improvements to Hackney Wick Station? Yes*
- d) *Do you agree with the ideas to improve connections between the Hub and the wider Fish Island area? Yes*

6 Creating a high quality environment

3.13 Independent advice to LTGDC (see heritage advice dated June 2011 attached as appendix B1) is that there is very little statutory justification for designating a conservation area in Fish Island North covering the area shown in figure 6.1 of the AAP. It is considered that the quality and interest of the area identified as a possible conservation area based on White Post Lane is limited and that just two of the buildings, those at no 9 Queen's Yard (built in 1913) and its companion opposite at No. 92 White Post Lane (built in 1904 and extended in 1923 at the rear), along with the road bridge over the Hackney Cut (erected in 1904), possess special interest in terms of their architectural and townscape quality and historic

value. LTGDC therefore consider that this small group of heritage structures could be linked to the adjacent sections of the two historic canals to the east and south, that is the Hackney Cut (Lea Navigation) of 1769 and the Hertford Union Canal of 1830, to create an area of sufficient quality and interest to justify designation of a conservation area. The possibility of extending the conservation area to the east could also be investigated, to include the King's Yard building built in 1905 and now within the Olympic Park.

- 3.14 LTGDC consider that Tower Hamlets should analyse the results of consultation on this issue as soon as possible and decide quickly whether to use their powers to designate a conservation area. The question of whether to designate a conservation area around White Post Lane has been debated for some time. Without designation of a conservation area, the ability to secure heritage led regeneration in this area, which is being promoted through the AAP, will be more difficult. A timely decision on designation of a conservation area would also provide more certainty to developers and landowners .
- 3.15 **Fish Island South** – reference is made at 6.17 to a site for a future waste to energy facility being identified. It is disappointing that a site is not identified in this draft of the AAP. There is no further information in this section about how such a facility is likely to be brought forward. Will it be brought forward by the private sector or by Tower Hamlets Council as waste authority?
- 3.16 **Fish Island East** - There is limited guidance for development of Fish Island East set out in this section. Although Fish Island East is owned by the Olympic Park Legacy Company and they will be proposing uses as part of the Legacy application to be submitted in late summer, it would be appropriate for the AAP to provide further guidance on the land use and design requirements for laying out this new area. There are references to a new primary school, nursery school, health centre and flexible community space, but it is not clear whether these uses are the requirements of the local planning authority, or simply those currently proposed by the landowner.
- 3.17 **Open Space** – Are the new local parks referred to in section 6.26 the same as the strategic open spaces that landowners etc need to work collaboratively on to deliver as described in section 6.27 – could this text be redrafted to be clearer? This section is written in a way that indicates that the AAP will need to do things, but it is not clear whether this is being left to a later version of the AAP, or if the options presented in the bullets at 6.26 are presented for consultation and will be chosen in the next version of the AAP.
- 3.18 **Water Space** – LTGDC are supportive of this section. Figure 6.2 also indicates 'scope for new crossings' over the waterspace. The diagram is a little misleading, as the ODA will be constructing a new bridge (known as

H14) to the eastern end of Monier Road where it intersects Roach Road, which is in between two of the 'scope for new crossings' indicators on figure 6.2. This diagram should be updated in the next version of the document; LTGDC would welcome the opportunity to work with Tower Hamlets to refine the location of new crossings that will be sought through the AAP.

3.19 Public Realm improvements - The committed improvements should also be shown on a map, along with some positive wording about how much better the improved areas now are, and when the improvements will be completed.

3.20 Creating a high quality environment Consultation Questions

- a) *Do you agree with the proposed character area development principles?* Yes, although we do not support the boundary of the proposed conservation area around White Post Lane for the reasons set out above.
- b) *Do you agree with the proposed strategies for water space and open space provision?* Yes, although as set out above the open space requirements should be clearer and sites designated in the next version of the AAP.
- c) *Do you agree with the priorities for public realm improvements?* Yes, although some of the identified improvements in table 6.1 and Fig 6.3 are already now committed and some have been completed.

7 Achieving Sustainable Development

3.21 Waste to energy facility - As set out in comments above, it is disappointing that an identified site for the waste to energy facility and more detail on how it will be delivered are not included in this version of the AAP.

3.22 Energy Efficiency - This section should be more emphatic about the requirement for new development to connect into the energy network, and that this will be required through section 106 agreement or condition on planning permissions.

3.23 Achieving sustainable development consultation questions

- a) *Do you agree with the principle of a borough waste to energy facility located in Fish Island?* Yes, but as set out above the next version of the AAP should be more specific about why it is needed, and specifically where it should be located, justified with appropriate evidence.

- b) *If so, how should a site be identified?* There are requirements e.g. size, proximity to water, which a site would need to meet and a site should be identified which meets those requirements, and a realistic delivery strategy should be set out by the Council.

Appendix C

Development Management DPD

1 Summary

- 1.1 The Development Management DPD will set out guidance for the planning application process and consist of detailed policies used to inform the process of planning application assessment.
- 1.2 At this stage, the consultation document is written simplistically and doesn't provide actual policies for consultation, concentrating on what things development management policies should cover to support the Core Strategy objectives.

2 Suggested general comments

- 2.1 LTGDC do not wish to comment in detail on this document at this stage, given that it can be assumed that Tower Hamlets will in due course prepare policies to support the core strategy objectives, which LTGDC support. Clear policies will also need to be prepared to be read in conjunction with the spatial policy areas identified in the Sites and Placemaking Document. LTGDC will comment in detail when there are actual policies drafted, the implications of which can be thoroughly considered at that stage.

Date: 5 July 2011