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Dear Sirs

**London Borough of Tower Hamlets' Community Infrastructure Levy (CIL) Revised Draft Charging Schedule (RDCS) Supplementary Evidence Requested by the Examiner representation on behalf of Londonewcastle**

In our previous representations, one of our key points raised was in relation to Opportunity Areas (OAs), such as the City Fringe/Tech City, within the borough boundary, which are clearly fundamental to the successful delivery of the Local Plan and London Plan, but have not been specifically accounted for or tested in the evidence.

Whilst we appreciate planning frameworks are still being worked on for this Opportunity Area, the City Fringe/Tech City includes the area of Whitechapel for which the London Borough of Tower Hamlets (LBTH) has adopted the Whitechapel Vision Masterplan Supplementary Planning Document (SPD). We would note the Council's reference in its supplementary evidence at paragraph 2.10 that the City Fringe OA is *'likely to be reviewed and expanded in the near future in accordance with the Draft City Fringe/Tech City Opportunity Area Planning Framework (2014)'*. We are not aware that this is as yet a public document and are therefore unable to review or comment. We would note, however, that the Draft Further Alterations to the London Plan which is currently undergoing its Examination in Public, proposes that the City Fringe/Tech City OA increases in area from 489Ha to 901Ha with an increased minimum new homes target of 8,700.

The majority of the SPD Masterplan area lies within the OA as identified in the draft 2008 OA Planning Framework. The Whitechapel Vision Masterplan SPD demonstrates in particular the importance of this area within the OA for delivery of new homes and jobs as well as social infrastructure including:

- 3,500 new homes (40% of the proposed FALP OA target)
- 5,000 new local jobs including a globally significant research campus and expansion of creative industries
- 7 new public squares and open spaces
- New streets and public routes (including a large green spine)
- New 21st century civic hub for Tower Hamlets
- New cultural centre and community facilities
- A destination shopping and leisure experience on Whitechapel Road
- Expanded and improved the street market

No specific area-based viability assessment of these Opportunity Areas has been undertaken.



Whilst the Council's further Supplementary Evidence has focussed on three 'strategic' sites (Wood Wharf, Bishopsgate Goods Yard and Westferry Printworks), we would suggest that this is not inclusive of or conclusive on the cumulative effect of the proposed CIL rates within Opportunity Areas as a whole and the Whitechapel Vision Masterplan area in particular. Of particular concern is the output of the supplementary evidence in respect of these three sites which concludes that where a 35% policy compliant affordable housing position is accounted for that the schemes are unviable even without the inclusion of CIL. The implications/consequences of this need to be considered in relation to the OAs which contain various strategically important sites that share similar characteristics and potential viability challenges to the three sites analysed by the Council.

On this basis, our previously expressed concerns remain and we reserve our position to attend any further hearing session.

Yours sincerely

DP9 Ltd