

**Development & Renewal
Infrastructure Planning**
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6th May 2014

Dear Mr Rivett

Re: Tower Hamlets Council's Response to Main Issues & Questions for the Examination

Please find enclosed the Council's response to the questions in the *Main Issues and Questions for the Examination* document. This response includes the Council's response to the procedural questions listed in Section 5 of your Briefing Note. We have also addressed the specific issues raised in statements by representors.

Some of these representations rely on new and detailed information, in addition to that which is already part of the Examination Documents list. In order to deal with these matters properly as part of the examination, the Council has had to refer to some additional market evidence and policy documents. These will all be made publicly available and published on the Council's website. We have aimed to limit the provision of this additional information, to those documents which provide useful context or clarification in direct response to the specific representations that have been received *since* submission. We have referred to these documents in our written response, and they are summarised below for clarity.

Further viability and market evidence has also been submitted by some of the representors in connection with strategic sites, offices, hotels and student housing. The Council has been able to assess this new evidence and to test the assumptions underlying it. In order to deal with this as part of the examination, we have had to refer to further information in addition to the evidence that is already before the examination. In doing this, the Council has drawn on the following sources, with regard to the specific questions that have been raised:

- *Additional Appraisal Evidence – Office, which addresses matters set out by GLA/ TfL in their written response to Question 11.*

- *Additional Appraisal Evidence – Hotels, which addresses matters set out by Travelodge in their written response to Question 13*
- *Student Accommodation Market Evidence, which addresses matters set out by Queen Mary University in their written response to Question 14*
- *Land Registry Sales Value Data, which provides context for the commentary included on sales values in representatives in written responses to Question 9*
- *Whitechapel Masterplan, which is specifically referenced in Question 9.*

It should also be noted that the Council has sought advice from Counsel, in light of the legal opinion submitted by Greater London Authority (GLA) and Transport for London (TfL), after submission, and which they draw on in their latest responses to Question 11 in particular. This deals with the relationship between the Crossrail SPG and the draft Charging Schedule. We do not agree with their legal analysis, and we consider that it will assist the Examination if this is set out in writing, in advance of the hearings. As this opinion from William Upton includes references to the *London Plan Crossrail Alterations - Report of the Panel (February 2010)* and *TfL Report to Finance and Policy Committee - Update on Planning Obligations (November 2013)*, these documents have also been provided. They also provide a useful context to the GLA and TfL submissions on the Crossrail issue.

As noted above, this additional information provides further contextual information, and the Council would ask that the documents be treated as part of the evidence for the examination. The Council has not relied upon this information to either change or alter the rates or charging zones proposed in the draft Charging Schedule. The Council asks to highlight these documents *ahead* of the hearings to ensure that they can be included in the examination library and circulated, should you consider it appropriate and useful to the examination process. The Council would propose to send them to relevant respondents in any event.

A full list of the additional documents, together with their proposed numbering, is set out below:

Hearing 2

ED5.8: Whitechapel Masterplan

ED5.9: Land Registry Sales Value Data

ED5.10: Additional Appraisal Evidence – Office; This contains: -

- Appraisal 1: Size Sensitivity
- Appraisal 2: JLL Sensitivity
- Appraisal 3: Market Assumption Update

ED5.11: Opinion of William Upton

ED5.12: London Plan Crossrail Alterations - Report of the Panel (February 2010)

ED5.13: TfL Report to Finance and Policy Committee - Update on Planning Obligations

Hearing 3

ED5.14: Additional Appraisal Evidence – Hotels; This contains: -

- Appraisal A – Travelodge Appraisal (Budget Hotel)
- Appraisal B – Premier Inn Appraisal (Budget Hotel)
- Focus - Supporting Market Evidence
- Estates Gazette Interactive – Supporting Market Evidence
- Travelodge Scheme Costs Sheet
- Travelodge East India Dock Disposal Brochure
- Travelodge Bethnal Green Disposal Brochure

ED5.15 Student Accommodation Market Evidence

The Council continues to seek to support and engage effectively with the examination process, in the lead up to the hearings and beyond. Please contact me if you would like us to provide further information or clarification.

Yours Sincerely



Anne-Marie Berni
Infrastructure Planning Manager