

# **STATEMENT OF COMMON GROUND**

Between the London Borough of Tower Hamlets and the Greater  
London Authority

In respect of Representation 68

**London Borough of Tower Hamlets  
Fish Island AAP  
Local Development Framework**

## **Statement of Common Ground 7 – GLA**

### **LBTH Fish Island Area Action Plan Examination in Public**

Date: 2 July 2012

Parties: LB Tower Hamlets and the Greater London Authority

Attendees: Marissa Ryan-Hernandez (LBTH)  
Michael Bell (LBTH)  
Kim Tagliarini (GLA)

#### **Role of this document**

This Statement of Common Ground has been prepared to identify the areas of agreement between the Greater London Authority and the London Borough of Tower Hamlets (LBTH) on matters relating to the Proposed Submission version of the Managing Development – Development Plan Document (MD DPD) and Fish Island Area Action Plan (FIAAP), to be resolved prior to the Examination in Public.

#### **Issues**

Amendments to the Strategic Industrial Location (SIL), specifically:

1. The amount of Strategic Industrial Location (SIL) safeguarded in Fish Island south has been reduced from the amount shown in the previous consultation version and agreed as part of the collaborative approach in the Council's Fish Island Area Action Plan (FI AAP) and the Mayor's Olympic Legacy SPG.
2. The London Plan states that the boundaries of SILs should be defined in the LDFs taking into account strategic and local assessment of supply and demand for industry and joint working on planning frameworks.

#### **Agreed actions**

1. LBTH to submit evidence to the Planning Inspector for the Examination in Public to clarify and support the new SIL boundary, in order to determine conformity with the London Plan (Annex 1).
2. GLA to agree that the amended SIL boundary and release of an additional 0.6 hectares of SIL is based on a clear and robust assessment of need, as stated in the attached policy position note in Annex 1, and is therefore in general conformity with the London Plan (GLA confirmation is provided in Annex 2).

Subject to these changes and actions being considered acceptable, the GLA will withdraw these specific issues from their representations.

## **Annex 1**

### **LBTH Policy Position**

#### Introduction

The Council has long sought to safeguard industrial land as evidenced through the 1998 Adopted UDP and the 2010 Adopted Core Strategy, to ensure the borough has the capacity to serve the local and wider economy and provide local employment opportunities. The borough is committed in delivering the London Plan industrial land capacity needs and the National Planning Policy Framework (NPPF) which advocates economic growth and supporting the wider economy.

To manage, promote and protect industrial land, the borough has a number of areas currently designated Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs) to ensure the remaining industrial land is appropriately located and receives strong protection. These locations play a vital role in the borough to support the service-based economy in areas such as Canary Wharf and the City Fringe provide an important sub-regional role for servicing central London.

#### Background

Through the London Plan and the borough's Local Development Framework (LDF), SILs are given strategic protection because their function and role as London's reservoir of industrial land, which can accommodate and support strategic functions such as heavier industrial activities such as storage and distribution, waste management, logistics, recycling, utilities, and some transport related functions which elsewhere might raise tensions with other land uses. On a local level through the designation in the Managing Development – Development Plan Document (Submission Version May 2012) the borough has identified LILs, which also provide a similar function to protect and safeguard industrial land. LILs are particularly suitable for activities lighter industrial activities including research and development, Small Medium Enterprises (SMEs) and new emerging green industries, which can be intensified with other uses.

Industrial activity defines much of the character of Fish Island today, and is one of few remaining areas in the borough that has a concentration of heavy industrial uses, notably food processing, waste management, printing, motor trades and construction industry. As such, the Council recognises the importance to protect industrial uses in Fish Island to serve the local and wider economy and provide local employment opportunities

#### Policy Development

##### *Core Strategy*

The Core Strategy was found 'sound', and was formally adopted by the Council in September 2010. The Core Strategy Spatial Policy 06 (SP06) safeguards and intensifies industrial land in the borough, and carries the principle of SIL in Fish Island south.

Part 5e of SP06 suggest a coordinated release of 20-50 ha of industrial land in the borough, over the LDF plan period (2025), which was informed by the Employment Land Study (2009). Considering the GLA's Industrial Capacity SPG (2008) which specifies a release benchmark of 83.0 ha of industrial land in Tower Hamlets (between 2006-2026), and the amount of industrial land already released from 2006-2008 in the borough, the Employment Land Study recommends an approximate further loss of 20 – 50 ha within the LDF plan period to 2025. The table below provides a summary of the potential industrial land release.

Factor	Land (ha)	Source
Industrial Employment Land Release 2006 – 2008	-33	Table 8.1
Approximate quantum of industrial employment land suggested for release from industrial employment use over the LDF timeframe (As per the ELS's recommendations 1 – 7 below)	-20	Tables 7.12, 7.13, 8.2 & Recs. 1-9 below
Maximum further quantum of industrial employment sites that could potentially be released, as identified within the GLA's forthcoming Olympics SPD (This further release would bring the 83 ha release figure in line with the GLA's Industrial Land Release Benchmarks Report)	-30.0	GLA's Industrial Land Release Benchmarks Report
<b>Total</b>	<b>-83.0</b>	

Employment Land Study, 2009

The adopted Core Strategy is a platform to begin further discussions on the managed release of industrial land to assist with the wider regeneration in Fish Island. As such SP06, part 5d, sets out the need to work with partners including the GLA to coordinate the managed release of SIL in Fish Island north and mid, through the Fish Island Area Action Plan (FI AAP).

#### *FI AAP Engagement Version – May 2011*

To inform the Managing Development – Development Plan Document (MD DPD) and the Fish Island Area Action Plan (FI AAP), the borough commissioned further work to define spatial policy areas, including SILs and LILs, and also provide guidance to how best manage these designations. The Spatial Economic Study (2011) recognises the need to protect industrial land and recommends that more land should be protected as industrial, than indicated in Employment Land Study and promotes a LIL in addition to the SIL in Fish Island.

Following the recommendations and designation approach in the Spatial Economic Study, the FI AAP Engagement Version (May 2011) proposed:

- Managed release of approximately 22 ha of SIL from Fish Island mid and north to assist with the residential and mix used redevelopment and a new neighbourhood centre at Hackney Wick .
- The area south of the Greenway approximately 3.6 ha, which comprise two live/work developments designated as LIL to facilitate a transitional zone between the SIL in Fish Island south the mixed use in Fish Island mid, and provide industrial protection.
- Consolidation of SIL in Fish island south approximately 9.8 ha, which is greater than the illustrative boundary in the Core Strategy.

*FI AAP Proposed Submission Version – January 2012*

The consultation comments received on the FI AAP Engagement Version and internal feedback on the Proposed Submission Version, expressed concerns that the two live/work developments on Wick Lane, (which several units have residential uses through Certificate of Lawfulness), will be significantly impacted by the proposed SIL designation. This raises potential reverse sensitivity issues which may jeopardise the role and function of how the SIL operates, and it is considered that heavier industrial uses would not be appropriate abutting these developments, due to the potential environmental and amenity impacts on occupiers.

Many occupiers of the live/work developments have highlighted through consultation representations on the FI AAP of environmental pollution from adjacent developments in the SIL. Given that live/work developments could potentially sit alongside light industrial uses through effective high quality design and management of new smaller scale industrial developments, the SIL boundary was moved southwards from Iceland Road to the north of Autumn Street, and the area has been designated as LIL. This provides a greater transition zone for the existing occupiers on Wick Lane and the building types and uses south of Iceland Road also fit better within LIL.

The SIL and LIL boundaries differed from the agreed definitions between the Council and the GLA, prior to Cabinet approval in December 2012. Upon further inspection and internal discussions prior to Cabinet approval on the Proposed Submission version, the Council amended the boundaries to avoid further conflict between residential amenity and industrial activity. As a result, the area south of Iceland Wharf shifted from SIL to LIL, as it effectively and appropriately provided a buffer zone between the live/work developments and SIL. This amounts to an approximate shift of 0.6 ha from SIL to LIL.

As set out in the Submission Version Managing Development – Development Plan Document (May 2012) policy DM17, the borough maintains a strong position on the LIL to ensure that any redevelopment safeguards industrial land and the future function is not jeopardised by reverse sensitivity issues. LIL also provides a similar role as a SIL, and ensures industrial floorspace is protected and maintained through redevelopment. LILs will enable the borough to meet its industrial capacity, support Tower Hamlets service sector and the wider London economy. However, it is recognised that other uses may come forward in a LIL.

Conclusion

The managed release of 22 ha industrial land from Fish Island north and mid is in accordance with the GLA's Benchmark (2006) of 83 ha of further industrial land loss in the borough, the Council's Core Strategy which recommends a release of 20-50 ha and the emerging draft GLA Benchmark (June 2012) of 35 ha.

Following the agreed boundaries with GLA on SIL and LIL in Fish Island, the Council made further amendments, which has resulted in the approximate

shift of 0.6 ha of SIL to LIL, which also amounts to a 6% shift. The Council believes this shift will not have a significant impact on the industrial release benchmark identified above as the LIL designation can also accommodate the reservoir of industrial land available for London. Whilst LIL may be considered for mix used development, this will be an industrial-led scheme to ensure that the future function of industrial employment is protected.

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## **Annex 2 GLA Policy Position:**

Policy 2.17 of the London Plan states "In LDFs, boroughs should identify SILs on proposals maps and develop local policies based on clear and robust assessments of need to protect their function, to enhance their attractiveness and competitiveness for industrial type activities including access assessment". Paragraph 2.83 of the London Plan states " The boundaries of SILs should be defined in LDFs taking into account strategic and local assessment of supply and demand for industry working on planning frameworks".

The GLA is satisfied that the amended SIL boundary and release of a further 0.6 hectares of strategic industrial land is based on a clear and robust assessment of need and is therefore in general conformity with the London Plan.

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