

STATEMENT OF COMMON GROUND

Between the London Borough of Tower Hamlets and MGPA
(represented by GVA Grimley)

In respect of representations 328, 329, 336, 330, 332, 333, 334, 74,
325, 326, 327.

**London Borough of Tower Hamlets
Managing Development DPD
Local Development Framework**

Statement of Common Ground – MGPA (represented by GVA)

LBTH Managing Development DPD Examination in Public

This Statement sets out at Appendix One the issues which MGPA seeks to address at the aforementioned Examination in Public. In doing so, it is considered to accurately represent the level of agreement which exists between both parties in respect of each element.

GVA
For and on behalf of MGPA

Michael Bell
For and on behalf of LB Tower Hamlets

NB: The outstanding issues to which this Statement relates were discussed at a meeting between GVA, MGPA and LB Tower Hamlets on 22 August 2012, the attendees were:

Attendees: Peter Farnham (LBTH)
Jonny Moore (LBTH)
Julian Carter (GVA Grimley)
Andrew Rose (MGPA)

Appendix One: Common Ground

Issue	Policy Reference	Position: MGPA	Position: LB Tower Hamlets	Agreement
Off-site provision of affordable housing.	DM3: Delivering Homes.	<p>Summary: Viability testing should be central to the Borough's policy for the maximisation of affordable housing provision whether that be on site, off site or payments in lieu. This is particularly important in the current economic climate and the policy should be amended to address this matter of clarification.</p> <p>Proposed amendment: Reference to be made to viability at policy DM3 (3) (a) (iii).</p>	<p>LBTH propose amending the wording of paragraph 3.8 to read: "If affordable housing is proposed to be provided off-site there should be no over-concentration of one type of housing in any one place and a minimum of 50% affordable housing must be provided overall (<i>subject to viability</i>)" (insertion in italics).</p>	<p>No Position agreed:</p> <p>It is recognised that the Borough's proposed amendment introduces reference to viability.</p> <p>MGPA seek that the amendment be made to policy rather than the supporting text.</p>
Affordable Housing	DM3: Delivering Homes	<p>We are concerned that as drafted Policy DM3 seeks to maximise affordable housing delivery without explicit reference to viability. Viability testing should be central to the Borough's policy for the maximisation of affordable housing provision whether that be on site, off site, payments in lieu or variations in tenure. This is particularly important in the current economic climate and the policy should be amended to address this matter of clarification. The National Planning Policy Framework (NPPF, DCLG, 2011) includes a presumption in favour of sustainable development at the heart of the planning system. This notes that local planning authorities should prepare local plans with sufficient flexibility to respond to rapid change (para 14).</p>	<p>No amendment proposed.</p>	<p>No position agreed.</p>

Issue	Policy Reference	Position: MGPA	Position: LB Tower Hamlets	Agreement
Local job creation and investment.	DM15: Local job creation and investment.	<p>Summary: The blanket requirement for 'approximately 12 months' marketing evidence is inappropriate for B1 Class Uses due to current and anticipated supply and impacts on the development process.</p> <p>Proposed amendment: DM15 is revised to state that outside of the Canary Wharf Activity Area, development should not result in the loss of active and viable employment uses in B2 or B8 use or B1 use where the unit is less than 2,500sqm GEA, unless either it can be shown, through a marketing exercise, that the site has been actively marketed (for approximately 12 months) and that the site is unsuitable for continued employment use due to its location, accessibility, size and condition or where evidence is produced that demonstrates that a building is incapable of viable refurbishment or redevelopment for continued employment use.</p>	No amendment proposed.	No position agreed.
Local job creation and investment.	DM15: Local job creation and investment.	Summary: The reference in representations on 9 March 2012 under policy DM15 to 'Glengall Bridge' should be deleted and replaced with 'Harbour Exchange'.	Agreed that errata will be struck out from the representation.	Agreed that for the purposes of the EiP 'Glengall Bridge' will be deleted from the representation on 9 March 2012 and replaced with

				'Harbour Exchange'.
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Issue	Policy Reference	Position: MGPA	Position: LB Tower Hamlets	Agreement
Building heights.	DM26: Building Heights.	<p>Summary: The indicative building heights hierarchy is arbitrary and unjustified on the basis of national and best practice guidance, the Borough's evidence base and existing permissions.</p> <p>Proposed amendment: Delete part 1, Figure 9 and Figure 10 of Policy DM26.</p>	No amendment proposed.	No position agreed.

Issue	Policy Reference	Position: MGPA	Position: LB Tower Hamlets	Agreement
Site specific guidance	SA20: Marsh Wall East site allocation guidance	Summary: Figure 48 (p.156) should be amended so that the development parcel at the Harbour Exchange site is amalgamated adjacent to the dockside.	LBTH agree to amend Figure 47 to identify the MGPA site adjacent to the dockside at South Quay as a Development parcel using a grey shape.	Position Agreed.
Site specific guidance	SA20: Marsh Wall East site allocation guidance	Summary: Figure 48 (p.156) should be amended so that all three development parcels in this location should be amalgamated and that a tailored solution can be identified for active frontage, publicly accessible open space and walking/ cycling routes as development comes forward. The figure as drafted presupposes a development form that might not be suitable for an improved wholesale redevelopment proposal	LBTH maintains its position regarding the design principle in relation to delivering public realm and the stepping back of development, which alongside Policy DM12 provides sufficient policy guidance supported by appropriate evidence.	No position agreed.