

POSITION STATEMENT

Neptune Wharf – LBTH Response

In respect of Session 5
Mid Fish Island – Including Opportunity Sites
Annex 2

**London Borough of Tower Hamlets
Fish Island Area Action Plan
Local Development Framework
9 July 2012**

This statement provides the Council's response to the issues stated within Neptune Group's Position Statement on Annex 2 for hearing session 5 of the Fish Island AAP Examination in Public. It does not seek to repeat information relating to the Council's position as stated elsewhere.

Issue 1

Firstly, as previously explained, the attached matrix is an initial demonstration that there are clearly a number of sites that are potentially suitable for accommodating a school. It demonstrates that Neptune Wharf scores poorly when assessed against relevant criteria and notably compares poorly when compared to the other sites within the AAP area.

Its purpose, in the absence of any robust evidence on site selection in the AAP/evidence base, is to demonstrate the wide range of potential sites that exist and the fact that many are far more suitable than Neptune Wharf and to encourage a more comprehensive review of potential primary school site options.

To explain the attachment a little further:

Map

We have identified potential parcels of land and from basic Land Registry research have shown both individual ownerships and groups where a potential amalgamation of sites could come together. However, we have focussed on those sites that do not necessarily require multiple site assembly. We do not assess individual sites that are clearly below the 0.4/0.5ha criteria.

What the map immediately identifies is that, despite what is perceived as a fragmented land ownership pattern, in reality there are a significant number of individual land holdings within the area that are capable of providing a school without requiring complex land assembly. At least one of these is believed to be in-part at least, in public ownership (site 14 part owned by LTGDC/LLDC).

Council's Response

- 1.1 Disagree. The Council's approach to selecting sites in light of viability and deliverability associated with land assembly is stated within the document attached to the letter sent to Austin Mackie Associates on 27 June 2012 and remains unchanged.

Issue 2

In addition, in considering suitability / deliverability of sites, a further factor possibly not considered by the LPA in relation to smaller sites and/or irregular plots is that whilst these may be difficult to develop for residential / mixed-use purposes, with difficulties meeting say amenity space, privacy separation and an appropriate mix of land-uses; they could potentially therefore be more appropriate to provide a school.

Council's Response

- 2.1 Disagree. The Council's approach to selecting sites in light of viability and deliverability associated with site size is stated within the document attached to the letter sent to Austin Mackie Associates on 27 June 2012 and remains unchanged.

Issue 3

This would be an even stronger consideration if LBTH maintains that it seeks to limit the residential capacity of FI to the suggested 2,800 upper limit, but continues to acknowledge as it does in the AAP, that this constrained target should be met primarily on the sites identified as residential-led. On this basis, there would be ample sites in the mixed-use areas that are not required to meet housing targets which could be made available for a school.

Council's Response

3.1 Disagree. Paragraphs 4.30 to 4.36 within the Fish Island AAP Submission Version state that residential uses in varying proportions are appropriate on all sites, subject to other relevant policy guidance, including waste site safeguarding and Local Industrial Locations, with the exception of Strategic Industrial Locations. The Council's approach to selecting sites is stated within the document attached to the letter sent to Austin Mackie Associates on 27 June 2012 and remains unchanged.

Issue 4: Selection Criteria

These are drawn from a review of the site suitability / selection criteria published by various local planning and education authorities, together with the application of some 'common sense' having regard to the existing character / aspirations for the area.

The detailed and specific criteria contrast to those used by the LPA as part of the AAP school selection process, as identified in the 'Site Selection Methodology Note', which only suggested four very generic criterion:

- *Within Core Strategy Area of Search for new primary school.*
- *In the centre / east of borough*
- *Size for school required is 0.4 hectares*
- *Good levels of public transport accessibility*

We remain unconvinced that an adequate process / evidence base led to the decision to include the proposed school designation (i) on the Neptune site and (ii) only on the Neptune site.

Council's Response

4.1 Disagree. The Council views the methodology for selecting sites to be sound and of an appropriate level of detail required for the Strategic Policies of a Development Plan Document. The Site Selection Methodology Note (2011) and the document attached to the letter sent to Austin Mackie Associates on 27 June 2012 state the methodology, including the criteria, used to allocate sites.

4.2 The criteria used by Austin Mackie Associates provides a number of criteria and analyses that were also undertaken by the Council in identifying sites:

- Public transport accessibility
- Spatial Policy Area acceptability
- Deliverability and viability

4.3 The Council views the other additional criteria presented by Austin Mackie Associates to be above the level of detail required for the Strategic Policies of a Development Plan Document. The presented detailed criteria offer useful considerations for pre-application discussions but the Council views the issues considered by these to be sufficiently manageable using London Plan policies, Core

Strategy Spatial Policies, development management policies, Fish Island AAP policies, supplementary guidance and any other relevant guidance.

Issue 5

In the detailed pre-application discussions that we have held on the site, whilst we appreciate that LBTH have not been in attendance at all sessions, Officers from LTGDC, GLA and the Legacy Authority / LLDC have repeatedly acknowledged that a school on the Neptune site is not necessarily an appropriate option and that a separate study should be undertaken to review potential options.

Council's Response

- 5.1 Disagree. The Council has not received formal representations or other comments objecting to the allocation of a primary school on Neptune Wharf from the relevant stakeholder organisations. All relevant stakeholder organisations have attended the Council's External Stakeholder Working Group on a regular basis to help guide and inform the delivery of a school within Fish Island.
- 5.2 It is not clear why LBTH, as the local planning authority (and the future education authority) and known to be in the process of preparing this AAP, were excluded from the meetings held in relation to pre-application discussions on the Neptune Wharf site, though it is acknowledged that LBTH were invited more recently being invited to one of the last two meetings attended by an ODA Officer.
- 5.3 In the pre-application advice letter sent to Austin Mackie Associates by the ODA (11th July) concerns were raised regarding social infrastructure. The letter stated that "there is a need for further development of your current scheme to take into account the current and emerging policy context that applies to Fish Island", specifically Policy SP07 of the Adopted Core Strategy, and the Fish Island AAP Submission Version which identifies the need for a new 3FE primary school on the Neptune Wharf site. The letter also stated that "any scheme will need to convincingly respond to the education priorities as identified by adopted LB Tower Hamlets policy, including those of the adopted LB Tower Hamlets Core Strategy as set out above, and demonstrate that the uses proposed do not prejudice the policies of the adopted Development Plan as they relate to the site".

Issue 6

Our view is that the assessment of potential school options should be a joint exercise by the various authorities and other delivery partners, an issue we have already discussed with the existing/future Development Corporation and GLA. In effect this would be a process informed by both the AAP and the parallel OLSPG process.

Council's Response

- 6.1 Noted. All relevant stakeholder organisations have attended the Council's External Stakeholder Working Group on a regular basis to help guide and inform the delivery of a school within Fish Island. LBTH have explained the rationale for the provision of the land for the school on the Neptune Wharf site. On this point all external stakeholders have made no objection to the current wording of the AAP as proposed by LBTH.