

POSITION STATEMENT

Workspace Group Investments – LBTH Response

In respect of Session 1 and 3
DM3 and DM17

**London Borough of Tower Hamlets
Managing Development DPD
Local Development Framework
11 September 2012**

Workspace Group – Position Statement LBTH Response Statement

This statement provides the Council's response to the issues stated within the Workspace Group's Position Statement for the Managing Development Examination in Public. This statement does not seek to repeat information relating to the Council's position as stated elsewhere.

Issue 1: Housing (Policy DM3)

Policy DM3 is unsound as it is not effective and is not consistent with national policy.

Summary

The approach taken in Policy DM3 provision of social rented homes alongside affordable rented homes is not sound as this is not deliverable as it fails to fully take account of viability issues, and is not compliant with national and regional planning policy.

Response

Disagree. Policy DM3 is consistent with current national and regional policy and provides additional guidance to address local circumstances. The Council maintains that the Core Strategy and Managing Development DPD provide a robust basis for the delivery of affordable housing that fully takes into account issues of viability. Core Strategy Policy SP02 states that 35-50% affordable homes are to be provided on sites providing 10 units or more, and that this is subject to viability. Policy DM3 seeks the provision of affordable homes to be 70% social rented, and 30% in intermediate tenures; where this is unviable affordable rent homes are to be provided alongside social rented homes to ensure 35-50% affordable housing is provided. The justification and evidence for this policy position is provided in the Council's updated Affordable Housing Viability Study (2011). In addition, the Council believes that in the majority of cases, it is feasible to deliver affordable housing on-site. This is justified by evidence contained within the Council's Affordable Housing Viability Study (2011). Part 3 A i-v of Policy DM3 sets out the circumstances where off-site provision will be considered. For off-site to be considered acceptable it must be demonstrated that all of the criteria can be met. Where it can be demonstrated that a suitable site cannot be found then in exceptional circumstances the Council will consider payments in lieu, ring fenced for additional affordable housing output.

Further evidence has been provided as part the Council's response to Position Statements. See "Response to Housing Issues – LBTH Response", attachment 1 – Briefing Note on Affordable Housing, Pod (September, 2012).

Issue 3: Employment (Policy DM17)

Policy DM15 Part 1 is unsound as it is not effective.

Summary

The flexibility of DM17 in relation to the redevelopment of sites with industrial B Use Class for SMEs.

Response

Disagree. The Council's priority within Local Industrial Locations is to safeguard industrial floorspace.

The council have agreed to provide clarity in the policy to state that the use classes being referred to regarding industrial provision are B1c, B2 and B8. Policy SPO6 of the Core Strategy recognises that some mixed use redevelopment or intensification may be appropriate in LILs and this could include SMEs of another use class, but most importantly any redevelopment must not result in no overall net loss of employment floorspace''. This is further reiterated in DM17, part 1, which clearly refers to no net loss of industrial B Use Class floor space'.