

# **POSITION STATEMENT**

**Locksbridge Ltd – LBTH Response**

In respect of Session 2  
Issue 2 – Homes and Jobs (Policies 4.1 to 4.7 inclusive)

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

## Session 2 – Locksbridge Ltd – LBTH Response Statement

This statement provides the Council's response to the issues stated within Locksbridge Ltd's Position Statement Homes and Jobs - Policies for hearing session 2 of the Fish Island AAP Examination in Public. It does not seek to repeat information relating to the Council's position as stated elsewhere.

### 1. Issue 1

Para 4.27 of the AAP therefore goes on to state that *'new development could deliver up to 2,800 houses across Fish Island'*. Fig 4.4 suggests that Fish Island North, Mid and East could provide 2000 – 2800 houses between them. Para 4.38 indicates that this is the total amount of provision that could be made in Fish Island. No reference is made to Fish Island South, and yet it is clear in the AAP that residential development is appropriate in this area.

Para 4.6 of the AAP sets out the strategy for providing a balanced mix of uses within the AAP area. These do not refer to the LIL south of the Greenway, focusing on residential led development to the north and heavier industrial uses in the new SIL. Para 4.9 shows the process that was undertaken to confirm the boundary of the new SIL, and a decision taken to exclude the area north of Wick Lane. Despite not being referred to in para 4.6, para 4.17 confirms that the designation of the LIL is considered to *'provide a better balance of uses across Fish Island'*.

### Summary

No reference to housing targets is made to Fish Island South, although the AAP acknowledges that residential development is appropriate in this area.

### Response

- 1.1 Disagree. To manage, promote and protect industrial land, the Council has consolidated Strategic Industrial Locations (SILs) and proposed Local Industrial Locations (LILs) in Fish Island south.
- 1.2 Through the London Plan and the Borough's Local Development Framework (LDF), SILs are given protection because of their ability to serve as London's reservoir of industrial land. This designation is able to accommodate and support strategic functions such as storage and distribution, waste management, logistics, recycling, utilities, and some transport related functions which elsewhere might raise tensions with other land uses. The designation of LIL through the Council's LDF also seeks to protect and safeguard industrial land.
- 1.3 The London Plan and the Boroughs Core Strategy acknowledges that housing is not appropriate in SIL, due to their role and function in supporting industrial activity. The Council believes that the LIL designation will also accommodate and meet the industrial requirements of London and the borough. It is acknowledge in the Council's Submission version Managing Development DPD and the Fish Island Area Action Plan that LILs can be intensified with other uses, including residential, however developments within LILs will not allow for the net loss of industrial floorspace and should be industrial-led schemes to ensure that the future function of industrial employment is protected in these locations.
- 1.4 The Council has not identified housing capacity in Fish Island south, due to the LIL and SIL designations.

## 2. Issue 2

Land north and south of the Greenway is designated as LIL in the AAP, but also falls into three further categories;

- Employment led regeneration south of the Greenway north of the SIL
- Mixed use regeneration to the north-west of the Greenway
- Residential led regeneration to the north east.

There is, however, no policy difference in the manner in which the three defined areas within the LIL are treated. Para 4.16 promotes opportunities for intensification of *'industrial and employment'* uses within the LIL, confirming the principle of development within all parts of the LIL as being *'no net loss of employment floorspace'*.

### Summary

The area north of the Greenway which falls within LIL is also referred to mixed use and residential-led regeneration, however no reference how LIL should be applied in these areas.

### Response

2.1 Noted. The Council will apply policy DM17 of the Submission version (2012) Managing Development DPD and FI4.2 of Fish Island Area Action Plan for proposals within the LIL. The Council maintains that developments within LIL will not result in the net loss of industrial floorspace and should be industrial-led schemes to ensure that the future function of industrial employment is projected.

2.2 It is acknowledged that the LIL also falls within the Fish Island mid, and for clarity the Council will amend figure 2.1 and 4.1 to identify the area north of the Greenway as employment-led regeneration to ensure consistency with policy FI4.2.

## 3. Issue 3

The Olympic Legacy Consultation Draft SPG published by the Mayor of London (August 2011) shows the AAP mixed use regeneration area and employment led regeneration area simply identified as mixed use in respect of the predominant land use (P.80, Fig 3.5.2 of that document). Whilst the Inspector's question in this Examination does not refer to that SPG, it is encouraging to note that the Mayor agrees with the principle that there is in effect no difference between the areas north and south of the Greenway.

At the bottom of page 79 of the draft SPG, it notes that it is the northern section of the retained SIL that could act as a buffer and transition zone to the more mixed use and residential areas to its north, not land to the north of the SIL. This makes more sense, given the existing residential element within the live/work units and relationship to the Greenway identified as issues preventing heavier industry in AAP paras 2.19 and 4.13.

### Summary

Consistency with the Olympic Legacy Consultation Draft SPG

### Response

3.1 Noted. The Council has been working closely with the GLA to ensure both documents are aligned. The Council has provided comments to the GLA to ensure the consistency between suggested land uses for Fish Island in the OLSPG with those proposed in Figure 4.1 of the AAP.

#### 4. Issue 4

The AAP is considered contrary to the London Plan since:

- a) Para 1.47 of the Conclusion to the section entitled Context and Strategy is to plan for continued growth in both homes and jobs. Importantly, it confirms that the projections used are not targets, and Policy 3.3 confirms that in preparing LDF documents *'Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target'*.

Policy 3.4 states that taking all relevant factors into account, development should optimise housing output, and development proposals which compromise this policy should be resisted. The policies of the AAP, in failing to promote and optimise housing development are therefore contrary to this policy of the London Plan.

- b) Policy 4.4 states that the Mayor will work to ensure that where industrial land is released, *'it can contribute to strategic and local planning objectives, especially those to provide more housing'*. The policy continues that in the preparation of local development framework documents, it should be demonstrated how surplus industrial land will help meet strategic and local requirements for a mix of other uses such as housing. Whilst land south of the Greenway is retained in the LIL, it is clearly seen as not required to provide for heavier industrial uses, following its removal from the SIL and the specific requirements for new industry within this area, as set out in paras 2.19 and 4.13.

#### Summary

The Fish Island Area Action Plan is contrary to London Plan policy requirement to optimise housing on surplus industrial land.

#### Response

- 4.1 Disagree. To manage, promote and protect industrial land, the Council has consolidated SIL and proposed LIL in Fish Island south.
- 4.2 Through the London Plan and the Boroughs Local Development Framework (LDF), SILs are given protection because of their ability to serve as London's reservoir of industrial land. This designation is able to accommodate and support strategic functions such as storage and distribution, waste management, logistics, recycling, utilities, and some transport related functions which elsewhere might raise tensions with other land uses. The designation of LIL through the Council's LDF also seeks to protect and safeguard industrial land.
- 4.3 The London Plan and the Boroughs Core Strategy acknowledges that housing is not appropriate in SIL, due to their role and function to industrial activity. The Council believes that the LIL designation will also accommodate and meet the industrial requirements of London and the borough. It is acknowledged in the Council's Submission version Managing Development DPD and the Fish Island Area Action Plan that LILs can be intensified with other uses, however developments within LILs will not allow for the net loss of industrial floorspace and should be industrial-led schemes to ensure that the future function of industrial employment is projected in these locations.

## **5. Issue 5**

In respect of the Core Strategy, Core Strategy Policy SP02 sets the target for the delivery of new housing over the plan period, focusing the majority of new housing in the eastern part of the borough including Fish Island; clearly every opportunity should therefore be taken to provide housing in appropriate locations in accordance with the London Plan; the AAP does not do this since it disregards the contribution of land in Fish Island South outside the SIL.

### **Summary**

No reference to housing targets in Fish Island south

### **Response**

- 5.1 The London Plan and the Boroughs Core Strategy acknowledges that housing is not appropriate in SIL, due to their role and function in supporting industrial activity. The Council believes that the LIL designation will also accommodate and meet the industrial requirements of London and the borough. It is acknowledged in the Council's Submission version (2012) Managing Development DPD and the Fish Island Area Action Plan that LILs can be intensified with other uses, including however developments within LILs will not allow for the net loss of industrial floorspace and should be industrial-led schemes to ensure that the future function of industrial employment is projected.
  
- 5.2 The Council has not identified housing capacity in Fish Island south, due to the LIL and SIL designations. Although it is acknowledged there is a potential opportunity for residential within the LIL, this will only be supported if a proposal can demonstrate its is industrial-led and the function of the industrial employment activity is protected and not jeopardised by reverse sensitivity issues