

# **POSITION STATEMENT**

**Shanpak Ltd– LBTH Response**

In respect of Session 3  
DM15 and DM16

**London Borough of Tower Hamlets  
Managing Development Development Plan Document Local  
Development Framework  
11 Sept 2012**

## **Shanpak LTD– Position Statement LBTH Response Statement**

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

### **Issue 1**

The MDP DPD designation of Tower Gateway (East) Local Office location (LOL) and should be deleted.

### **Summary**

Site at Ensign Court on Ensign Street be de-designated within the proposed Tower Gateway LOL on grounds that it lacks evidence to support it for POL or LOL by referring to the URS Employment Land Study (2009) which does not clearly identify demand in this location.

### **Response**

Disagree. The Council maintains that the site's LOL designation is appropriate to protect the existing provision of B1 office to allow for future growth and intensification over the life of the Plan (2025).

It should be noted the Council has already amended the designation from a POL to LOL to allow for a mix of uses following recommendations set out in the LBTH Spatial Economic Study. This is predicated on no net loss of office employment floorspace in order to maintain the overall vitality and viability within this location and the wider LOL borough designations. It does not consider any justification to delete the Tower Gateway East designation as part of this plan period given its existing nature, built form and land use.

### **Issue 2**

The soundness of policy DM15 and DM16 should be amended to allow greater flexibility of land uses.

### **Summary**

Policy DM 15 should be reworded to allow for loss of employment based on demand for premises and not through a submitted marketing study for approximately 12 months. Policy DM16 should also be reworded to delete the requirement for marketing study for approximately 2 years to justify employment loss in a LOL designation.

### **Response**

Disagree. The Council views policy DM15 to be sufficiently flexible in accordance with the NPPF in managing employment floorspace by requiring a marketing exercise for "approximately 12 months". This change in the marketing period required has been in response to market signals and is a significant decrease from the previous Unitary Development Plan policy of four years and Interim Planning Guidance Core Strategy and Development Control Plan of two years. It also reflects discussions with development management colleagues in light of their experiences with applications for change of use from B class. Policy DM16 requests a 2 year marketing exercise in order to better understand and assess the viability, attractiveness and demand for local B1 office floorspace employment and is considered reasonable and appropriate timescale in the context of this 15 year plan making period to 2025.