

4 September 2012

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LDF DPD Consultation
D&R Strategic Planning
London Borough of Tower Hamlets
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Dear Sir/Madam

**London Borough of Tower Hamlets Managing Development – Development Plan Document
Position Statement from the Ballymore Group**

Further to our responses dated 15th July 2011 and 9th March 2012 upon the Site and Placemaking and Managing Development DPDs respectively, I hereby set out the Ballymore Group's Position Statement prior to the forthcoming Examination in Public.

Background

The Ballymore Group is a major international landowner, developer and investor that owns a number of sites within the Borough, many of which have been completed, with others either benefitting from planning permission or are currently being promoted through the planning system. These include: Bishopsgate Goods Yard, Carmen Street, Leamouth Peninsula, large parts of the Millennium Quarter and Baltimore Wharf.

Comments

Delivering Homes – Policy DM3

As previously set out, the policy aims are understood and Ballymore Group continue to support the delivery of affordable housing off-site or a payment in lieu, subject to the identified criteria. For reasons of transparency within the Council's LDF, we maintain that policy DM3 should emphasise that proposals are to be assessed on a site-by-site basis in viability terms, in accordance with the overarching Core Strategy policy (SPO2).

With regard to part 1 of policy DM3, it is evident that Social Rent is preferred to Affordable Rent. Such a stance is contrary to the London Plan (Revised Early Minor Alterations – June 2012) which promotes the provision of Affordable Rent at policy 3.10, in order to achieve mixed and balanced communities and to maximise the overall provision of affordable housing. The London Plan does not indicate preference for either product, nor does it advise that Local Planning Authorities should. Rather, it advises that affordable housing should be maximised, which policy DM3 inherently fails to encourage by stating preference for Social Rent tenure, which is significantly more costly to provide.

Accordingly, this aspect of policy DM3 creates uncertainty for applicants, particularly for large scale developments that are referable to the Mayor of London.

Ballymore Group

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Building Heights – Policy DM26

As detailed within our previous representations, the criteria that tall building proposals are required to satisfy are noted. However, Ballymore Group maintain that Figure 9, which sets out indicative building heights, is far too prescriptive as the height of each building should be determined on a scheme by scheme basis. Moreover, it is considered that the maximum height of a building should be determined in the context of its overall design and role in the existing and emerging townscape; for instance a well-designed tall building may be appropriate adjacent to public transport node given the higher PTAL and the way-finding role that the building could play in urban design terms. It seems that Figure 9 would preclude taller building proposals if the site is not within a Major Centre or the CAZ and therefore is overly restrictive on the numerous areas within Tower Hamlets where the use, context and character is rapidly changing.

Site Allocations

A number of Ballymore Group owned sites are identified in the document as suggested sites for the provision of housing and employment growth. Specific comments on each of the sites are set out below.

Site	Comments
1 - Bishopsgate Goods Yard	BG reiterate that we are currently working with its joint venture partner, Hammerson, to design a comprehensive redevelopment of the site, taking into account onsite heritage issues. The scheme is anticipated to provide a mix of uses including circa 1,800 new homes. The developed scheme will take cognisance of the Interim Planning Guidance of the site (January 2010), prepared by LB Hackney, GLA and LB Tower Hamlets.
Proposed site allocation - Leamouth South	This site is not allocated in the document, although BG is seeking to promote the site for redevelopment to provide a significant housing-led regeneration scheme, in the region of 1000 new homes as well as other uses. Extensive pre-application discussions were held with LBTH officers in recent years regarding such a proposal. Given the nature and scale of the development, it is considered that the site should be allocated accordingly within the DPD. Furthermore, given the high density residential context of the site since the approval of the adjacent Leamouth North, together with its riverside location, it is considered that the site is capable of delivering similar levels of high density development and should be allocated as such. Upon delivery of the consented river bridge at the adjacent Hercules Wharf, the site will also be afforded with direct access to Canning Town public transport interchange.

Contact

If you have any further queries in relation to the comments above, please contact me at this office (020 7510 9140). In the meantime, I would be grateful if receipt of this letter could be confirmed.

Yours faithfully

A handwritten signature in blue ink, appearing to be 'SR', with a small dot at the end of the final stroke.

Simon Ryan
Town Planning Manager
Ballymore Group
Tel: 020 7510 9140