



4 September 2012

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**Issue Number 7
Representor Number 635200**

Dear Sir

**LB TOWER HAMLETS 'MANAGING DEVELOPMENT' DPD PUBLIC EXAMINATION
Position Statement Submitted on behalf of Bishopsgate Goods Yard Regeneration Limited
Site Allocation 1 Bishopsgate Goods Yard**

On behalf of our client, Bishopsgate Regeneration Limited, we wish to submit the following 'Position Statement' in advance of appearing at the Public Examination of the LB Tower Hamlets Managing Development DPD. This Position Statement is submitted in respect of Site Allocation 1 'Bishopsgate Goods Yard'.

We recognise that the scope of the Public Examination is to consider whether the DPD meets the 'soundness' tests set out in the National Planning Policy Framework. However, it should be noted that the previous written representations on the 'Proposed Submission Version' of the Managing Development DPD on 8th March 2012 provided comments on a number of policies including Policy DM25, and the representations within that letter remain valid in respect of this particular issue.

This 'Position Statement' is provided in respect of Issue 7, as follows:

"Are the proposals for growth and change in this area appropriate and justified including in relation to the NPPF, the London Plan and the Core Strategy and in terms of environmental, economic and social impact; are they clear and deliverable by 2025?"

The section below sets out the reasons why the proposed wording of the Site Allocation 1 is not consistent with the NPPF, the London Plan and the Core Strategy.



Policy Framework

The key planning policy document relating to Bishopsgate Goods Yard is the 'Bishopsgate Goods Yard Interim Planning Guidance' that was adopted by the Council, LB Hackney and endorsed by the GLA in 2009 and was published early in 2010 [Examination Document ref. EB30]. The Borough boundary between LB Hackney and LB Tower Hamlets cuts through the western portion of the site (to the west of 'Wheler Street' on figure 14 of the DPD, now known as 'Braithwaite Street').

The DPD outlines that one of the design principles for the site is to, "*Focus larger scale buildings around Shoreditch High Street Overground Station with scale decreasing to the east and west*".

Firstly, we consider that this terminology does not wholly accord with the IPG in respect of building heights. Paragraph 2.36 of the IPG [Examination Document ref. EB30] advises that, "*The key guiding principle is that there will be transition in scale and building height across the site from west to east. The tallest buildings should be sited west of Braithwaite Street, with transition in scale to Brick Lane.*" As such, the aspiration of the IPG is for taller buildings to the west of Braithwaite Street, with heights reducing from west to east direction across the entire site. As such, it is possible that the tallest buildings on the site could be within LB Hackney.

Secondly, the DPD refers to the "*scale*" of buildings as opposed to "*height*". As such, if a scheme is proposed to meet the requirement for a large office tenant for a 'ground scraper / large floorplate' building the reference to "*scale*" would mean that the scale of other future buildings, within a tall building area, should then decrease.

We believe that this proposed terminology will unnecessarily encumber the Goods Yard land (within the identified tall building area in LB Hackney) and does not accord with the aspirations set out in the IPG.

Consideration of 'Soundness'

For the above reasons, the proposed wording of the second bullet point of Site Allocation 1 Bishopsgate Goods Yard is considered 'unsound' as the policy approach is not consistent with that set out in the adopted site specific policy for the site. Furthermore, the proposed wording of the policy is unclear and undeliverable.

Proposed Change

To make the wording of the policy 'sound', it is suggested that the following changes be made to the wording of the DPD, to reflect paragraph 2.36 of the IPG for the site:

*"Focus larger scale **and taller** buildings around Shoreditch High Street Overground Station with scale **and height** decreasing ~~to the east and west~~ across the site from west to east."*



We confirm that we wish to attend the hearing session scheduled for Thursday 20th September, at which this issue is to be discussed.

If you would like to discuss any aspect of these representations in more detail please feel free to contact Julian Shirley of this office, otherwise we look forward to discussing this issue at the upcoming examination.

Yours faithfully,

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