

## London Borough of Tower Hamlets – Fish Island Area Action Plan – Examination in Public

### The Anderson Group - Position Statement

The following position statement sets out why the Fish Island Area Action Plan (AAP) is unsound and provides a recommendation to the Inspector outlining how the AAP could be amended to be made sound. The following statement should be read in conjunction with the representations submitted 14 July 2011 and 12 March 2012 on behalf of The Anderson Group. It is also material to consider the Statement of Common Ground agreed between The Anderson Group and officers but subsequently retracted by the Council (see Appendix 1).

#### What particular part of the document is unsound?

The opportunity sites section (pgs 96 – 101) of the AAP is unsound as it does not identify Swan Wharf or 4 Roach Road as Opportunity Sites.

#### Which soundness test does it fail?

This section of the AAP is unsound as it is not effective. Both sites are strategically important and share similarities with other sites allocated as Opportunity Sites. The decision to not allocate these sites is therefore inconsistent, leads to confusion which will ultimately undermine the deliverability of important objectives.

#### Why does it fail?

##### *Swan Wharf*

Swan Wharf is located adjacent to the Old Ford Lock Crossing which provides an important existing pedestrian route linking Fish Island Mid with Fish Island East, the Greenway and Olympic Park beyond.

The Old Ford Lock Crossing is currently narrow and difficult to navigate particularly for the mobility impaired. Due to the long term importance of this connection it has been identified within the AAP as medium term priority for upgrading to address the issues raised above.

After extremely positive dialogue with the Council they concurred that Swan Wharf had an important role to play in terms of enhancing local connectivity and improving wayfinding and a Statement of Common Ground was agreed between both parties to designate Swan Wharf as an Opportunity Site.

However, shortly after the Statement of Common Ground had been agreed the Council, rather disappointingly, retracted their position in this regard.

We maintain that contrary to the Council's latest position this Site is of strategic importance given its immediacy to Old Ford Lock Crossing and the potential for the Site to contribute towards the upgrading of the Crossing and generally enhancing wayfinding within the AAP area.

The site can be brought forward quickly for redevelopment. The early delivery of the right form of viable and deliverable development on this site can only contribute to ensuring the strategic planning objectives defined by the AAP are achieved, particularly the cost of funding an upgrade to the Old Ford Lock Crossing.

Given the current economic climate developers require a significant degree of certainty if they are to commit funding towards redevelopment and investing in an area in need of regeneration. In light of this background we consider the AAP is unsound because it is not effective and should provide the developers of this strategically important site greater certainty in respect of the Council's 'in principle' support for its redevelopment. This approach will also provide the Council with greater certainty concerning the identification of future development sites that will need to fund key infrastructure, such as the Old Ford Lock Crossing.

## 4 Roach Road

Due to the proposals for an 'all modes' bridge linking Monier Road with Fish Island East and the Olympic Park, the site at 4 Roach Road will become a strategically important node in the public transport and pedestrian/cycle network. Up to 18 buses per hour will be stop adjacent to the site. The proposed 'all modes' bridge located adjacent to 4 Roach Road will provide the only vehicular route linking Fish Island South and Fish Island Mid to Fish Island East, the Olympic Park and Stratford International Station.

4 Roach Road is therefore a strategically important site that warrants identification as an Opportunity Site to ensure that its redevelopment appropriately defines this 'gateway' location.

The site is considered an opportunity that can be brought forward quickly for redevelopment. We have already had meetings with officers at LBTH to discuss development options. Current proposals include a new facility for the London Youth Rowing Club. The early delivery of the right form of viable and deliverable development on this site can only contribute to ensuring the strategic planning objectives defined by the AAP are achieved.

Given the current economic climate developers require a significant degree of certainty if they are to commit funding towards redevelopment and investing in an area in need of regeneration. In light of this background we consider the AAP is unsound because it is not effective and should provide the developers of a strategically important site greater certainty in respect of the Council's 'in principle' support for its redevelopment.

### How could the document be made sound?

The AAP could be made sound by identifying Swan Wharf and 4 Roach Road as Opportunity Sites.

### What is the precise wording sought?

The Anderson Group propose the following wording for the allocation of Swan Wharf as an Opportunity Site as previously agreed with Council officers:

#### Swan Wharf, Dace Road (Approx 0.25Ha)

- Opportunity for heritage-led regeneration which may include employment, residential, affordable housing plus other appropriate uses in accordance with key principles identified for Fish Island Mid
- Development should respond to the waterfront character where the site adjoins the Lea Navigation and enhance the local setting of Old Ford Locks
- The site should enable and enhance public access and views across the waterways and along Dace Road
- Development should respond to the site's location within a conservation area and seek to maintain or enhance the character of Dace Road through redevelopment of existing buildings fronting Dace Road.

The Anderson Group propose the following wording for the allocation of 4 Roach Road as an Opportunity Site:

#### 4 Roach Road (Approx 0.14ha)

- Opportunity for residential led mixed use regeneration in accordance with key principles identified for Fish Island Mid
- Development should respond to the waterfront location
- Development should respond to the proposed 'all modes' bridge crossing adjacent to the site and deliver a form of development that identifies the location of this strategically important crossing.
- The site should enable and enhance public access and views across the waterway.

**APPENDIX 1 – RETRACTED STATEMENT OF  
COMMON GROUND**

# Statement of Common Ground 5 – The Anderson Group

## LBTH Fish Island Area Action Plan Examination in Public

Date: 25<sup>th</sup> June 2012

Parties: LB Tower Hamlets, Montagu Evans and the Anderson Group

Attendees: Jonny Moore (LBTH)  
Simone Williams (LBTH)  
Will Edmonds (Montagu Evans)  
Les Penn (The Anderson Group)  
Andrew Jay (The Anderson Group)

### Issues:

In relation to the representations submitted by Montagu Evans on 9<sup>th</sup> March 2012 on behalf of The Anderson Group, the following issues have been discussed:

- clarification regarding building heights guidance on Fish Island Mid (AAP Policy FI 6.2);
- clarification regarding active uses of the canal, (AAP Policy FI 6.6);
- consideration of identifying Swan Wharf and / or 4 Roach Road as an Opportunity Site (Chapter 7: Delivering Sustainable Regeneration); and
- constraints regarding the potential deliverability of the proposed all modes bridge over the Lea Navigation linking Monier Road to Fish Island East (AAP Policy FI 3.3)

### Agreed:

Clarification regarding building heights guidance on Fish Island Mid (AAP Policy FI 6.2)

- Clarification was provided by LBTH regarding building heights specifically that those development proposals above 6 storeys will be subject to detailed assessment within the Managing Development DPD and national guidance.
- The following additional wording will also be provided to Section 7, 'Delivering the AAP', to provide clarification regarding a balanced approach towards encouraging and promoting redevelopment.  
*"The Council will take a proactive approach toward development when delivering the AAP such that it reflects the presumption in favour of sustainable development as set out in the National Planning Policy Framework. The Council will seek to balance the need for encouraging and promoting redevelopment in Fish Island, with the requirement for contributions towards priorities, as defined by the policies in the AAP and the Implementation Plan in Appendix 2".*

Clarification regarding active uses of the canal, (AAP Policy FI 6.6)

- An additional point is to be included within FI 6.6 to ensure that development seeks to protect or enhance active uses on the waterways, such as for recreation or leisure use. The delivery of active waterway uses is an example of the 'priorities' referred to in respect of the additional clarification referred to for Section 7. A photo to illustrate active uses will also be included.

Consideration of identifying Swan Wharf as an Opportunity Site (Chapter 7: Delivering Sustainable Regeneration)

- It is agreed that Swan Wharf be identified as an Opportunity Site in Chapter 7: Delivering Sustainable Regeneration alongside the following guidance:  
"Swan Wharf, Dace Road (Approx 0.25Ha (TBC))
  - Opportunity for heritage-led regeneration which may include employment, residential, affordable housing plus other appropriate uses in accordance with key principles identified for Fish Island Mid
  - Development should respond to the waterfront character where the site adjoins the Lea Navigation and enhance the local setting of Old Ford Locks
  - The site should enable and enhance public access and views across the waterways and along Dace Road
  - Development should respond to the site's location within a conservation area and seek to maintain or enhance the character of Dace Road through redevelopment of existing buildings fronting Dace Road."

Concerns regarding constraints of the deliverability of the proposed all modes bridge over the Lea Navigation linking Monier Road to Fish Island East (AAP Policy FI 3.3, Appendix 2: Implementation Plan)

- LBTH can clarify that technical work has been undertaken by the applicant (OPLC) as part of the Legacy Communities Scheme application regarding the all modes bridge from Monier Road to Fish Island East. A

resolution to grant outline planning permission was passed by the ODA Planning Decisions Team on 26 June 2012.

- LBTH maintains that an all modes bridge at Monier Road be defined as a strategic connection and be identified on Table 3.1 and in AAP Policy FI 3.3, as well as be considered as 'essential' in the Implementation Plan (Chapter 7). This due to the need to provide improved connections between emerging communities on Fish Island Mid and the new community on Fish Island East. Enhancing connectivity between Fish Island Mid and its surroundings is also considered essential to achieve sustainable development and ensure that communities in Tower Hamlets can access new facilities and opportunities in Fish Island East, the new Queen Elizabeth II Park, and the Olympic legacy area. In particular a new vehicular bridge between Fish Island Mid and Fish Island East will allow bus services to achieve greater penetration into residential areas, increasing public transport accessibility levels. Specifically this connection is required to allow the proposed extension of the 339 service to serve Fish Island Mid, which will connect the emerging community with Stratford via the new community proposed for Fish Island East.
- Whilst accepting the potential public transport benefits of a The Anderson Group maintain concerns over the deliverability of an 'all modes' bridge and the impacts this would have on the amenity of existing and future residents. It is therefore recommended that the AAP text recognises that further assessment is required. To recognise the issues regarding the deliverability of all connections over the waterways it is proposed that the following working be added to paragraph 3.15:;

*"These connections will be subject to further detailed assessment regarding design, planning, management and deliverability.*

### **Outstanding Issues**

Consideration of identifying 4 Roach Road as an Opportunity Site (Chapter 7: Delivering Sustainable Regeneration)

LBTH maintains its position that 4 Roach Road is not identified as an Opportunity Site as neither its size nor its location are of sufficient strategic importance to achieving the vision for Fish Island to justify its identification as an Opportunity site. This issue will be addressed through a Position Statement to be provided by The Anderson Group