

JHM/TJWH/DP3024

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Dear Sir,

POSITION STATEMENT IN RESPECT OF LB TOWER HAMLETS' MANAGING DEVELOPMENT DPD PUBLIC EXAMINATION

SUBMITTED ON BEHALF OF EXPRESS NEWSPAPERS (ID: 635844)

ISSUE 3 – EMPLOYMENT (DM15)

On behalf of our client, Express Newspapers, we wish to submit the following position statement in advance of appearing at the examination of LB Tower Hamlets' Managing Development DPD.

It should be noted that previous written representations on the 'Proposed Submission' version of the Managing Development DPD were submitted on behalf of Express Newspapers by CBRE, in a letter dated 8th March 2012. These previous representations provided comments on a number of policies including Policy DM15, and the representations within that letter remain valid in respect of this particular issue.

This position statement is provided in respect of Issue 3, which is as follows:

'Are the employment policies consistent with the NPPF, the London Plan and the Core Strategy and/or supported by clear and robust evidence; are they reasonable and realistic, clear, deliverable and appropriate to local needs and circumstances, including in relation to small and medium enterprises?'



Policy DM15

Since submitting our previous representations, additional supporting text has been included alongside policy DM15 which seeks to provide flexibility for sites which benefit from an allocation for alternative uses.

The additional wording at paragraph 15.4 indicates the Council recognise that '*...the nature of uses proposed on site allocations requires a change from existing uses.*' The Council also recognise in paragraph 15.4 that the development of site allocations is needed to help deliver their component strategic infrastructure uses. This additional text is supported, however, the main policy text in document MD1 remains unchanged, and does not specifically identify allocated sites do not need to undertake a marketing exercise as outlined in Part 1 of the policy.

As currently drafted, Part 1 of policy DM15 would still require sites such as Westferry Printworks to undertake a marketing exercise prior to their redevelopment.

Paragraph 173 of the NPPF identifies that plans should be deliverable and that sites which are identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.

It is considered that the current wording of Policy DM15 does not facilitate the delivery of allocated sites within the plan, and additional wording should be included which provides sufficient flexibility and allows allocated sites to be delivered.

In its current format the wording of policy DM15 is considered unsound as the policy does not present the most appropriate strategy. The policy is also not consistent with national planning policy contained within the NPPF, with the current policy placing an increased burden on sites which are allocated for redevelopment for alternative uses.

Proposed Change

To make the Policy sound it is suggested that the following changes be made to the wording of the policy:

*'...Development should not result in the loss of active and viable employment uses, unless **the site is allocated for alternative development, or it can be shown, through a marketing exercise, that the site has been actively marketed (for approximately 12 months) and that the site is unsuitable for continued employment use due to its location, accessibility, size and condition.**'*

It is confirmed that we wish to attend the hearing session scheduled for Wednesday 19th 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 Jonathan Marginson or Tim Holtham of this office, otherwise we look forward to discussing this issue at the upcoming examination.

Yours faithfully,

DP9
Enc.