

JHM/TJWH/DP3024

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**Delivered by courier and email**

Dear Sir,

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

**SUBMITTED ON BEHALF OF EXPRESS NEWSPAPERS (ID: 635844)**

**ISSUE 4 – EDUCATION (DM18)**

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 8<sup>th</sup> March 2012. These previous representations provided comments on a number of policies including Policy DM18, and the representations within that letter remain valid in respect of this particular issue.

This position statement is provided in respect of Issue 4, which is as follows:

*'Are the education 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 student accommodation?'*



## **Policy DM18**

Since submitting our previous representations, the Council has commented in examination document MD5 (Representations and Responses Report) that the process for identifying the requirement for schools within the various site allocations is contained within examination document EB57 (Site Selection Methodology Note). This document was reviewed as part of our previous representations and the comments made remain valid.

Following a recent meeting with the Council, it is understood that the evidence base which forms the justification for the additional need for primary and secondary schools in the borough is not due to go before the Council's Cabinet until the 5<sup>th</sup> September.

Paragraph 182 of the NPPF identifies that in order to be sound, a plan needs to be justified and provide the most appropriate strategy, when considered against the reasonable alternatives, and be based on proportionate evidence. For the reasons given under our representations to the Site Allocation 18, we do not consider that the Council's approach to allocating potential schools to be sound.

On this basis, the current approach outlined by Policy DM15 is not considered to be supported by a clear and robust evidence base, and the Policy is therefore not justified and should be considered unsound.

### **Proposed Change**

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

*'b. Safeguarding the potential for schools in accordance with ~~site allocations~~ the Core Strategy's areas of search.'*

It is confirmed that we wish to attend the hearing session scheduled for Wednesday 19<sup>th</sup> 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.**