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FAO: Ms. Charlotte Glancy – Programme Officer
C/O Banks Solutions
80 Lavinia Way
East Preston
West Sussex
BN16 1DD

26 July 2018

Respondent ID: 1053884

Submitted by hard copy and email

Dear Ms Glancy,

LONDON BOROUGH OF TOWER HAMLETS LOCAL PLAN: MANAGING GROWTH AND SHARING THE BENEFITS

WRITTEN HEARING STATEMENT

On behalf of our client, Queen Mary University of London ('QMUL') (Respondent ID: 1053884¹) CBRE Limited ('CBRE') is instructed to submit this Hearing Statement in respect of the London Borough of Tower Hamlets Local Plan.

This statement responds to a number of Matters and Issues as identified in ID-05 (Schedule of Matters and Issues for the Examination). The matters that have been addressed are set out below and provide further written comments above those which were contained within our submission to the Regulation 19 Consultation.

- Matter 6: Local Housing Need – including Affordable Housing and Student Housing;
- Matter 7: Employment and Economic Growth;
- Matter 8: Heritage, Design and Tall Buildings; and,
- Matter 10: Site Allocations.

Representations were submitted by CBRE on behalf of QMUL to the Regulation 19 consultation in November 2017. This statement does not reproduce the issues set out in previous

¹ This Respondent ID was attributed to Queen Mary University of London when consultation comments were submitted to the Regulation 19 Consultation.

representations, with the comments made relating to questions of soundness of the submitted plan. Each of the issues has been responded to in relation to the test of “soundness” set out in paragraph 182 of the National Planning Policy Framework, March 2012² (‘NPPF’).

MATTERS AND ISSUES

Matter 6 – Local Housing Need – including Affordable Housing and Student Housing

Issue 6 – Will the LP be effective in delivering the appropriate type of housing to meet the needs of the borough

We previously set out our support for the amended Policy D.H6 which sets out that new student accommodation should be in highly accessible locations or in close proximity to existing higher education institutions. This is in line with QMUL’s strategy for future accommodation growth in LBTH centred around their campuses at Whitechapel and Mile End. The Local Plan should be positively prepared to support the growth of student accommodation in accordance with the draft London Plan which acknowledges the contribution of student accommodation to the housing market and should be counted towards meeting housing targets.

As drafted Policy H4 (Specialist Housing) relates to the provision of specific housing products. Whilst there is reference within the sub-text to the provision of ‘staff accommodation ancillary to a relevant use’ we consider that this text and policy should be amended and expanded to provide further clarification on what this specific use is considered to be. This request links also to Issue 6.4 in document ID-05 which requests clarification on the definition of non-conventional housing.

QMUL are a key employer within LBTH and many of their employees require residential accommodation in close proximity to the two campuses at Whitechapel and Mile End. Previous submissions have emphasised the importance of including reference to a definition of ‘key worker housing’ which can be delivered specifically to meet the needs of those who work within specific sectors within Tower Hamlets.

It is considered that the delivery of key worker housing will help alleviate the pressures on market housing and the Council in catering for these specific needs, and is something that the new NPPD makes specific reference to. The new NPPF published 24 July 2018 refers to housing for ‘essential local workers’. Essential local workers are public sector employees who provide frontline services in areas including education.

We therefore do not consider that this element of the plan has been positively prepared in that it does not address specific infrastructure requirements as it does not provide a specific policy or sufficient reference/definition of key worker housing and would request that this is incorporated (see underlined text below) in order to make the policy sound. It is requested that paragraph 4.51 is expanded to state:

² Whilst on the date of submission the 2012 NPPF has been superseded, in line with Para 214 of NPPF (2018) for the purposes of examining the LBTH Local Plan the policies in the previous NPPF (2012) will apply.

Staff accommodation ancillary to a relevant use such as key worker housing associated with Med City³.

Matter 7 – Employment and Economic Growth

Issue 7 – Are the policies justified, deliverable and consistent with national policy? Are the site allocations proposed by the LP in relation to employment and economic growth clearly justified and appropriately defined?

Employment – Local Employment Location

In their previous representations QMUL sought further clarification on Policy D.EMP4 to ensure that the land use aspirations set out in the Whitechapel South allocation would not be undermined by the wording of Policy D.EMP4. QMUL remain in support of both the Whitechapel South allocation and the identification of the site as a Local Employment Location ('LEL'). However, further reassurance that the policies are not in conflict with each other is still required to ensure that the policy accords with being positively prepared as set out in paragraph 182 of the NPPF. QMUL proposes that the policy wording is amended to clarify that the policies are not in conflict with one another and recommends the following amendment to paragraph 5.15:

The borough's Local Employment Locations (LELs) have relatively high public transport accessibility levels and support significant numbers of jobs but have unique individual characteristics. Applicants should aim to ensure that new employment space that is brought forward contributes to and meets the demands of each area. In particular within the Whitechapel LEL, applicants should also refer to the Whitechapel South allocation⁴ and Whitechapel Vision Masterplan Supplementary Planning Document. New development within LELs will be expected to provide high-quality flexible workspace designed to meet the needs of emerging and growing sectors (e.g. research and development), to meet the needs of other small-to-medium enterprises and creative businesses.

Matter 8 – Heritage, Design and Tall Buildings

Issue 8 – Does the LP take a justified and suitable evidence based approach to heritage, design and tall buildings? Is the LP consistent with national policy in relation to these matters and will it be effective in implementation?

Location of Tall Buildings

In their previous representations QMUL sought amendments to Policy D.DH6 (Tall Buildings) to allow for the development of tall buildings in areas where they are demonstrably appropriate in the context. QMUL welcomes the inclusion of the Minor Modification 77, which inserts the following text, "Proposals for tall buildings on the edge or within the vicinity of tall building zones will be expected to follow the step down approach from the cluster to avoid the merging of clusters".

³ Underlined text is the suggested addition to the wording of para 4.51.

⁴ Underlined text is suggested addition to Paragraph 5.15.

In addition, they support the amendments as set out in Minor Modification 78 which now acknowledges educational facilities as significant infrastructure provision and allows for the justification of tall buildings outside the identified zones. This will ensure that the Plan has been positively prepared for future growth and is applicable for any future development by the University at Mile End or Whitechapel.

In the previous Regulation 19 representations, QMUL requested that Part 3a of the policy be expanded to strengthen the legibility of a town or district centre⁵, as Whitechapel is currently a designated district centre. QMUL consider that the opening of the Elizabeth line and the emergence of a nationally important high-tech and bio-science cluster may in the future allow for this designation to be revisited and could see Whitechapel being re-designated as a Major Centre, as defined by the London Plan. Therefore, the current policies should encourage this growth and acknowledge it as a location that could be appropriate for tall buildings subject to individual site environmental considerations. This would ensure the plan has been positively prepared to accommodate growth. We request that this amendment is made to Part 3a.

Matter 10 – Site Allocations

Issue 10 – Are the Site Allocations justified by the evidence base and of sufficient detail so as to be effective in deliver?

QMUL has agreed a Statement of Common Ground ('SOCG') with London Borough of Tower Hamlets ('LBTH') specifically in relation to the Whitechapel South allocation (see Enclosure 1). The SOCG sets out the agreed actions between LBTH and QMUL and the outstanding matters still to be resolved. The following actions have been agreed:

- Site Allocation Plan – Floyer House is currently within the site allocation and shown on the site allocation map (Figure 26) and policies map;
- Land Use – A minor modification has been proposed to the land use requirements to include dental and educational uses associated with the Med City. This has been picked up in Minor Modifications 236 and 241; and,
- Health Facility – The Sexual Health Centre is expected to be re-provided within the Whitechapel South allocation, in line with policies S.CF1 and D.CF2.

QMUL are satisfied that the actions as set out above are considered to be resolved through the SOCG and that no further representations relating to these topics are required through this Hearing Statement.

The following matters, relating to the Whitechapel South allocation remain outstanding, and QMUL request that the points are revisited:

- Housing – The SOCG sets out that matters regarding the maximisation of family housing will be discussed the EIP. In their previous representations QMUL sought to include key worker accommodation and student accommodation within the proposed allocation. Whilst the principle of including student accommodation within the allocation is

⁵ Underlined text is suggested addition to Part 3a.

accepted, the SOCG outlines that there is insufficient evidence to demonstrate why key worker housing is required as opposed to the general delivery of market, intermediate and affordable housing which can also meet the needs of key workers.

QMUL would seek to reiterate that key worker housing would be a key to the establishment of a Life Sciences Campus and would assist in the longer-term retention of staff. We would request that this is recognised in the allocation to allow for a specific provision to be made to schemes coming forward in the future to deliver the necessary specific housing needs in addition to the inclusion of student accommodation to the allocation.

- Land use – In their previous representations QMUL proposed that reference to QMUL be included within the land use section of the allocation. Whilst it is acknowledged by QMUL that the existing location of the University is referenced within paragraph 2.12, it is proposed that the paragraph should also contain a link. In addition, it is considered that further clarity is needed when referring to paragraph 2.12 as there is more than one paragraph with this reference within the document. For clarity, it should refer to paragraph 2.12 associated with Policy S.SG1 (Areas of Growth and Opportunity within Tower Hamlets).

Whilst QMUL acknowledge the Council's position on land use, we would request that for clarity that explicit reference is made to QMUL and associated land uses within the site allocation. This is because the focus is not just on medical research, but also should related to associated uses of the University and other educational and teaching growth.

OVERVIEW

In summary, whilst QMUL support the Local Plan, there are a number of amendments that have been outlined that are considered necessary for it to be sound.

These are summarised below, and we request that these are incorporated into the plan prior to adoption.

- Whitechapel South Allocation – Inclusion of key worker housing and student accommodation within the site allocation. In addition to this, QMUL also request that reference is made to the University within the land use section of the allocation.
- Local Employment Location - Clarification required that Whitechapel designated as an LEL does not conflict with the Whitechapel South allocation, particularly with regard to land use restrictions.
- Location of Tall buildings - Reference to Whitechapel as an acceptable location for tall buildings and inclusion of 'district centre' within part 3a of Policy D.DH6.

In addition, QMUL are continuing to engage with LBTH regarding their aspirations for growth at their Mile End campus and welcome further engagement regarding a masterplan that can form a framework for future development growth across the Plan period.

We trust that this statement is helpful and look forward to receiving notification of receipt. To confirm, QMUL wish to rely upon this written statement and previous representations and do not wish appear at the hearings. However, if you have any queries on the above, or require further information or clarification, please do not hesitate to contact me (hannah.blunstone@cbre.com) or my colleague Laura Morris (laura.morris@cbre.com).

Yours faithfully,

A handwritten signature in black ink, appearing to read 'H Blunstone', written over a light grey rectangular background.

HANNAH BLUNSTONE
DIRECTOR

cc. Nick Davie, QMUL
Richard Halsall, QMUL

STATEMENT OF COMMON GROUND

**Between the London Borough of Tower Hamlets and Queen Mary
University of London**

**In respect of representations relating to Whitechapel South site
allocation (1.4)**

**London Borough of Tower Hamlets
Local Plan**

Statement of Common Ground – Whitechapel South Site Allocation

Tower Hamlets Local Plan Examination in Public

Date: July 2018

Parties: London Borough of Tower Hamlets (LBTH) and Queen Mary University of London (QMUL)

In relation to the representations dated 13th November 2017 submitted on behalf of Queen Mary University of London in response to the Local Plan regulation 19 consultation.

The area contained within the Whitechapel South site allocation is under multiple ownerships; this statement relates only to land under Queen Mary University of London's ownership.

This statement of common ground covers the following key topic areas:

1. Site allocation plan
2. Land use
3. Health facility

Agreed Actions

Site allocation plan

- Floyer House is currently within the site allocation and is shown on the site allocation map (figure 26) and the Policies Map.

Health facility

- Local Plan policies seek to protect community facilities including health facilities. As such, the sexual health centre is expected to be re-provided which aligns with policies S.CF1 and D.CF2.

Outstanding Matters

Land use and housing

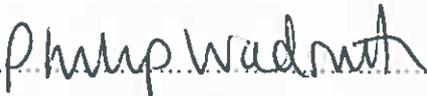
- QMUL questions the requirement for maximising the provision of family housing. The site allocation should also cover alternative residential accommodation (e.g. student accommodation and key worker housing). There is insufficient reference to the presence of Queen Mary University of London within this site allocation.
- LBTH: The type of housing on the site will be determined through the development management process as this is covered under the housing policies. The Local Plan sufficiently recognises the importance of a new medical research cluster with the Queen Mary University of London.

Signed on behalf of Queen Mary University of London


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Date: ..25/7/2018

Signed on behalf of London Borough of Tower Hamlets


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Date: ..26/7/2018

