

Appendix 2 - Justification for Article 4 Direction – Office to Residential

Introduction & Background

- 1.1 The importance and significance of employment land (within the 'B' uses of the Town and Country Planning (Use Classes) Order 1987 (as amended)) and floorspace for providing jobs and fuelling economic growth and regeneration in the borough is recognised by the Council. Alongside economic growth strategies and programmes of support for local enterprise, the Council actively seeks to protect and improve such business land and floorspace through the planning process by protecting existing viable employment land and floorspace, designating key employment clusters and areas of employment activity and supporting new employment space in the most viable locations. This not only supports existing businesses, helping them to thrive, but also to encourage new enterprise and growth to provide job opportunities for local people.
- 1.2 The majority of employment space in the borough is within the B1(a) use class, which predominantly consists of offices. Offices also make up the bulk of the borough's significant projected future employment growth as set out in the Greater London Authority's (GLA) London Plan and this is reflected by the recent 'Employment Land Review' (ELR) (2016) produced as evidence for the Council to support its own new Local Plan (anticipated to be adopted in 2018). The GLA projection forecasts 125,000 new jobs in the borough in the period to 2031 of which approximately 122,500 will be within offices. This equates to a need of approximately 1.4 million square metres (sqm) of additional B1(a) floorspace. A lower (minimum) projection produced by Experian forecasts almost 36,000 new jobs which requires around 436,000sqm of additional floorspace.
- 1.3 The ELR assessed that when existing permissions for gain or loss of B1(a) floorspace is taken into account there is a surplus of floorspace available which means the minimum Experian growth projection can be exceeded by 401,000sqm. However, compared to the higher GLA projection there is a shortfall of 547,000sqm.
- 1.4 On 30th May 2013 the Town and Country Planning (General Permitted Development) Order 1995 was amended to enable permitted development (PD) – in other words a change of use without need for a full planning application – from offices (B1(a)) to residential (C3) via a process known as "Prior Approval". This was initially introduced for a period of three years, but was subsequently made permanent. Offices need not be vacant to be converted. The only stipulation was that they were (or had been, in the case of vacant properties) in office use (B1(a)) before 30th May 2013 and that there were no concerns for the local authority arising from:

- Transport and highways impacts of the development
 - Contamination risks on the site
 - Flooding risks on the site
- 1.5 Properties coming into use as offices from 30th May 2013 onwards were not eligible for this form of permitted development.
- 1.6 Prior to introduction of this PD, the provision of B1(a) floorspace in the borough could be managed through the planning system to ensure proper consideration of proposals which might result in the loss or reduction B1(a) floorspace. Since its introduction, the ability of the Council to maintain sufficient floorspace to help meet future projected need has been undermined.
- 1.7 The Government's intention to introduce this permitted development right was communicated to local authorities in January 2013. At that point they were given the opportunity to apply for exemptions, with the Council duly making such an application¹ while also objecting to this PD right more generally.
- 1.8 The application for exemption was successful in part, with two exemption areas being agreed within the borough²:
- The area of the borough to the west which is covered by the GLA's City Fringe Opportunity Area Planning Framework and the Central Activities Zone designation.
 - The area of the borough to the east which is covered by the Isle of Dogs Community Infrastructure Levy (CIL) charging schedule.
- 1.9 Both of those areas contain a significant volume of existing and potential B1(a) floorspace including employment clusters of international significance and strategic importance to London. Land values for residential use are very high in those areas, making residential development lucrative in comparison to commercial uses. Without the exemption, it is likely that a significant quantum of B1(a) floorspace may have been lost. However, the exemption will cease on 31st May 2019.
- 1.10 Furthermore, residential developments arising from permitted development from offices are not required by the legislation to provide the affordable housing, amenity space, child playspace or minimum space standards that might be expected of proposals subject to full planning applications. Given the height and scale of many existing office buildings within the exemption areas, it is quite plausible that residential conversions would severely constrain the Council's ability to provide sufficient affordable housing to meet identified need and to ensure appropriate living standards for the health and wellbeing of future residents.

¹Map 2 - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/197656/Maps_1.8-1.9_London_Borough_of_Tower_Hamlets.pdf

²Map 1 - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/197656/Maps_1.8-1.9_London_Borough_of_Tower_Hamlets.pdf

Mechanism to maintain exemption from PD

- 2.1 In order to remove PD to respond to local circumstances, local authorities may make what are termed 'Article 4' directions. Article 4 directions may be made and implemented immediately (following a period of statutory consultation of no less than twenty-one days), in which case for a one year period local authorities are liable to compensate landowners affected by the Article 4. Compensation is the difference between the capital value of the property had permission been granted and the capital value of the property without planning permission. For example, if with planning permission a property is valued at £1,000,000 but without the value is £600,000, the Council would have to pay the landowner £400,000 if an application is submitted but refused. There is no reimbursement for fees associated with attempting to obtain planning permission. To avoid compensation payments, non-immediate Article 4 directions can be made which take effect at least one year from the date of issue.
- 2.2 Without the Council bringing forward an Article 4 direction to remove permitted development, as is advocated by the GLA, there is a substantial risk that the employment function of many of the borough's key employment areas would be undermined and the ability to meet projected future employment growth would be constrained. Therefore it is vital that the Council takes steps to maintain the current exemptions in place beyond the cessation date of 31st May 2019 by making and issuing an Article 4 direction in a timely manner; it must be adopted by 31st May 2018 to avoid any payment of compensation. That deadline is critical, as due to the high land values in the borough the Council's financial liability should an immediate Article 4 direction become necessary could be considerable.

Policy Context

- 3.1 Further to qualitative and quantitative evidence within the ELR which justify seeking to maintain the existing exemption, there are also policy justifications at national, regional and local levels which support the introducing an Article 4 direction. These are set out below.

National

- 3.2 At the national level, the National Planning Policy Framework (NPPF) centres on sustainable development consisting of an economic, social and environmental role. This includes providing the supply of housing to meet the needs of current and future generations, but also providing sufficient land in the right places to support economic growth. Paragraph 18 states the Government's commitment to securing economic growth in order to create jobs and prosperity, and paragraph 19 places significant weight on supporting economic growth through the planning system. Paragraph 21 includes provision to plan positively 'for the location, promotion and expansion of networks of knowledge driven, creative or high technology industries'. While

Paragraph 47 seeks to significantly boost the supply of housing and Paragraph 51 supports redevelopment of commercial buildings where there is need for housing in the area, it is made clear this should not occur where strong economic reasons would make such development inappropriate. As such the economic importance of the existing exemption areas would justify bringing forward an Article 4 direction which allows the Council to properly plan for economic growth in the most important locations. Moreover, the NPPF states that Article 4 directions should be used in “situations where (this is) necessary to protect local amenity or the well-being of the area”.

Regional (London)

- 3.3 While the Mayor of London recognises the pressing need for more homes in London through London Plan Policy 3.3 (2015), so is the strategic significance of the borough’s office provision within the existing exemption areas also acknowledged. This is principally through the London Plan (2015) but specific supplementary guidance and demonstration of the need to maintain exemption areas through Article 4 is provided through the Central Activities Zone (CAZ) Supplementary Planning Guidance (SPG) (2016). The SPG also covers the north of the Isle of Dogs.
- 3.4 The SPG sets out that residential uses are not appropriate within the ‘commercial cores’ of the City of London and the north of the Isle of Dogs (Table 1.1 of page 16). Those cores are considered to align with the borough’s Preferred Office Locations (POLs)³, designated through the existing Local Plan (Core Strategy 2010 and Managing Development Document 2013) and proposed to be carried forward when the next Local Plan is adopted. This is to enhance and promote the unique role of the CAZ to ensure that office provision is not strategically constrained and that there is provision for a range of occupiers. Further to the commercial core, the CAZ SPG also calls for office and other strategic functions to be given greater weight relative to residential use in what they have referred to as a secondary ‘Zone B’ and equal weight within a ‘Zone C’. The areas of the borough categorised as Zones B and C have been identified through a study (Preferred Office Location Boundary Review, 2017) produced in support of the Council’s new Local Plan. Therefore an unmanaged adjustment to the nature and character of those areas would risk undermining their strategic significance and designated functions.
- 3.5 Outside of the CAZ, the remainder of the borough’s current western exemption area is covered by the GLA’s Fringe City Fringe Opportunity Area Planning Framework (OAPF), 2015⁴. This area includes ‘Tech City’ which is a cluster of digital and creative businesses, and ‘Med City’ which is a Mayor of London initiative to establish a world-leading centre for life sciences. Whitechapel is an important Med City location. OAPF objectives include ensuring there is the space for continued

³ <http://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Neighbourhood-Planning/Adopted-Policies-Map.pdf>

⁴ Map available in Figure 1.4, https://www.london.gov.uk/sites/default/files/city_fringe_oapf_adopted_dec_2015.pdf

business growth in the City Fringe, striking the appropriate balance between residential and commercial development and supporting the mix of uses that make the City Fringe special. Significantly, Strategy 2 (Protecting a Quantum of Workspace Needed to Facilitate Growth) notes that removal of the current exemption could lead to significant harm to the growth potential of the City Fringe. As such, the OAPF proposes Article 4 directions be made by the relevant local authorities to ensure that London's nationally and internationally significant business locations are safeguarded. Paragraph 2.16 suggests potential evidence that would support such Article 4 directions.

- 3.6 A number of policies within the London Plan itself also promote office and employment uses and help to manage development that comes forward concerning office uses. For example, Policies 2.10 and 2.11 refer to the importance of office space within the CAZ to London's economy and Policy 2.13 cites the City Fringe as supporting London's critical mass of finance and business services alongside other activity such as the creative industries. Policy 2.15 requires town centres to accommodate economic activity, and Policy 4.2 addresses sustaining and developing London's dynamic clusters and specialist functions through its office stock.

Local (Tower Hamlets)

- 3.7 The Council's emerging Local Plan (Regulation 18 version consulted on between November 2016 and January 2017) supported by the most up-to-date evidence base contains designated employment areas, as is the case with the existing adopted Local Plan (Core Strategy (2010) and Managing Development Document (2013)). The relevant designations are the Preferred Office Locations (POLs) and Local Employment Locations (LELs); LELs are referred to as Local Office Locations (LOLs) within the current adopted Local Plan. All of the POLs and three of the four LOLs proposed to be taken forward within the new Local Plan are within the existing exemption areas. Those exemption areas also contain a number of designated town centres, also recognised as important in providing offices which meet the needs of more local markets.

- 3.8 The current Local Plan policies relevant to B1(a) floorspace are as follows:

Core Strategy (2010)

- Spatial Policy 06

Managing Development Document (2013)

- Policy DM15 (Local job creation and investment)
- Policy DM16 (Office locations)

The emerging new Local Plan policies as consulted on between November 2016 and January 2017 are as follows:

- Strategic Policy EMP1 (Investment and Job Creation)
- Strategic Policy EMP2 (Employment Locations)
- Strategic Policy EMP3 (Provision of New Employment Space)
- Policy EMP4 (Protecting Employment)
- Policy EMP5 (Redevelopment within the Borough's Employment Areas)
- Policy EMP6 (Providing Affordable Workspace)

3.9 Both the new and existing Local Plans seek to retain employment space including offices where it continues to meet a need, and supports and promotes the role of the designated areas. Existing policies have been effective in retaining office space where it remains viable and delivering new office space particularly within the designated employment areas. Proposed policy seeks to strengthen protection of existing floorspace and promote the delivery of new floorspace to meet the projections outlined in paragraph 1.2. As the PD right undermines the intent of these and the proposed policies, an Article 4 direction to maintain exemption from PD would be justified.

The Borough's Supply of Offices

- 4.1 There are offices located throughout the borough. The most significant concentrations can be found within the City Fringe and around the north of the Isle of Dogs, within which all of the borough's non-industrial designated employment areas are located. These meet the needs of a variety of occupants, with the Council's ELR (2016) noting that demand is fragmented; it varies from multi-national institutions to secondary office space attracting companies seeking a cheaper alternative to the City of London and the West End to a local market meeting the needs of local people. There is also substantial provision of flexible workspace for start-ups, SMEs and creative industries.
- 4.2 The designated employment areas, which include POLs and LELs, contain a significant proportion of the borough's office floorspace. There is also substantial office provision elsewhere throughout the City Fringe of various typologies, such as large purpose-built offices, period conversions and small units provided as part of new developments. Around the Canary Wharf POL and Blackwall LEL within the current Isle of Dogs CIL charging area exemption zone are a number of more recent office developments, completed from the 1980s onwards, of varying scales. This area also has significant capacity for additional office space.

- 4.3 Elsewhere there are some purpose-built office buildings around the borough which tend to be of a smaller scale to those within the City Fringe and around the north of the Isle of Dogs. There are also a number of small units, for example on the ground floor of recent residential developments.

The Need for Offices

- 5.1 GLA employment projections suggest that 125,000 additional jobs may be provided in Tower Hamlets across the new Local Plan period (2016-2031). The majority of those jobs are within offices. Of the 125,000 jobs, 110,000 will be within the area of the Isle of Dogs and South Poplar Opportunity Area Planning Framework (OAPF). This figure is based on past delivery and the capacity of Tower Hamlets to deliver significant new office space; the presence of concentrations of offices and a large future pipeline itself draws demand from other boroughs. A second lower projection provided by Experian suggests a growth in jobs of 35,716. That figure takes a view of overall growth across London and spreads it more equally between boroughs. Broadly, this equates to a need of between 404,000 and 1.4 million square metres of additional floorspace based on a figure of 11.3 square metres pre job⁵.
- 5.2 While the Council's 2016 Employment Land Review identifies sufficient capacity in the borough to exceed the lower projection, it is not clear whether the most ambitious GLA figure can be met. Nonetheless, uncontrolled loss of existing offices risks undermining the borough's supply of floorspace and its ability to meet projections. This is especially the case if losses were to occur at some of the borough's largest employment sites.

Office to Residential Permitted Development Conversions to date

- 6.1 As of March 1st 2017, in total there have been 109 Prior Approvals submitted since the office-residential permitted development came into force. Of those, 66 were granted, 18 were refused and 18 were withdrawn. Decisions were outstanding on the remaining 6.
- 6.2 The Prior Approvals that have been granted will result in the creation of 988 homes. Of those, at least 83 are on sites providing less than 10 units and 905 are on sites providing more than 10 units.
- 6.3 Based on a policy compliant unit mix, that means that potentially there are 317 new market homes being provided that should be within affordable tenures. It is also likely, on the basis of Prior Approvals submitted to date where information on the dwelling mix has been included, that almost all homes being provided through office-residential conversion are studios, 1-beds and 2-beds. This means that the borough's need for family homes is not being addressed through these developments.

⁵ Figure from GLA's London Office Policy Review, 2014

- 6.4 Housing space standards as set out in Policy DM4.1 of the Managing Development Document (2013) state a minimum size of 50sqm for a one bedroom flat for two people. It is likely that the vast majority of new housing provided through conversion of offices will be one and two bedroom flats. Using the figure of 50sqm, the 988 homes which could be created through this form of PD would equate to the loss of 49,400sqm of B1(a) floorspace. Using the ELR figure of 11.3sqm per job, this equates to the potential loss of 4,371 jobs.

Conclusion

Need for an Article 4 direction

- 7.1 Fundamentally, an Article 4 direction is needed to maintain the Council's ability to manage development within key locations to ensure that the strategic role of the borough's employment locations are maintained, that the need for employment space can be met, and that Council, GLA and national economic objectives can be achieved. The significance of the areas of the borough to be protected through an Article 4 was recognised by Government when the areas of exemption were agreed in 2013. The announcement of 13th October 2015 that office to residential permitted development would become permanent gave until 2019 for the current exemption to cease to allow local authorities sufficient time to bring forward Article 4 directions. Paragraph 1.2.2 of the GLA's CAZ SPG states the Mayor of London's strategic support for an Article 4 that would protect the CAZ, Tech City and the north of the Isle of Dogs.
- 7.2 Within Canary Wharf, the thirteen largest office buildings provide around 1.1 million square metres of office space. Therefore, the conversion of just two of those buildings would start to put severe pressure on the borough's ability to meet office floorspace needs. When it is considered that Canary Wharf constitutes just one of five POLs, and that elsewhere within the City Fringe and north of the Isle of Dogs area there is also a significant quantum of office floorspace outside of designated areas, without the intervention of an Article 4 direction it would take just a small proportion of conversions to leave the borough with a shortage.
- 7.3 It should be noted that bringing forward an Article 4 direction would not indicate that all change of use from B1(a) to residential would be inappropriate and would not be supported. It just ensures that any such proposals are properly assessed and considered to make sure that only floorspace that is genuinely unviable is permitted for conversion.

Implications of not making an Article 4 direction

- 7.3 Failure to make an Article 4 direction to remove permitted development from office to residential would likely have a major impact not just on the Council's ability to provide sufficient employment space to meet projections but also on its ability to ensure appropriate housing is provided to meet identified need.
- 7.4 Should new housing come forward at a significant scale through permitted development in the current exemption areas it is highly likely to compromise the supply of affordable and family housing to meet need. The reasons for this are twofold. Firstly, with no management on unit and tenure mix schemes brought forward through permitted development, schemes are likely to focus on providing smaller one and two-bed market units. Secondly, a significant quantum of homes coming forward through permitted development is likely to act as a barrier to other sites subject to full applications. This is because developers would be unwilling to flood the local market with new homes which would lead to downward pressure on prices and thus impact viability. Without such sites coming forward the affordable and family housing and supporting infrastructure expected of such developments would not materialise. Furthermore, the lack of minimum size and amenity requirements for such conversions could lead to negative impacts on the health and wellbeing of residents.
- 7.5 The other major implication is that the role and function of the borough's employment areas could be undermined, as described previously.
- 7.6 There are potentially negative impacts on businesses arising of the supply of office space being lost. Fundamentally, viable businesses may be displaced as there is no requirement that offices are vacant when Prior Approvals are submitted. Secondly, an increase in rents partly through the supply of employment space becoming restricted and partly because of competing land values could negatively impact existing businesses and act as a disincentive to new businesses moving in.

Recommendation

- 7.7 In light of the information and evidence provided above, **it is recommended that a non-immediate Article 4 direction to remove permitted development from B1(a) to C3 is made and issued by 31st May 2018 to take effect from midnight on 1st June 2019.** The Article 4 should cover the entirety of the current areas of exemption, along with some additional areas that contain office space that it would be beneficial to maintain. The areas of coverage are set out in Annex 1 and should be reflected on the maps published to accompany the Article 4 direction.

Process required to bring forward an Article 4 Direction in line with the recommendation

Requirements and Process

- 8.1 The preparation of an Article 4 direction must include the following:
- Confirmation of the change of use to be addressed by the Article 4 direction
 - Identification of the geographical boundaries to which the Article 4 will apply, and for that information to be mapped and recorded
 - Compilation of robust and up-to-date evidence to justify the Article 4 direction and the boundaries/properties to which it would apply.
 - Consideration of whether an immediate Article 4 direction is required, and if so for an assessment to be completed to identify the likely financial liability and risks to the Council from doing so
 - Undertaking public consultation for a period of at least twenty-one days, including publishing a Public Notice on the Council's website and in local press, displaying site notices at locations to be covered, and informing the Secretary of State in writing
 - Confirmation of the Article 4 by Cabinet
 - Publication of the confirmed Article 4 direction

Proposed Timescales

- 8.2 Where up-to-date evidence is available the resource required (both human and financial) to take forward an Article 4 direction is relatively limited. The majority of work required is related to the reporting requirements for permission to consult (Cabinet) and confirmation of the Article 4 direction.
- 8.3 As noted in paragraph 1.2, the Council is in receipt of its own up-to-date evidence base on employment uses. Furthermore, there is additional justification and support for such an Article 4 from the GLA through the London Plan (in particular the Central Activities Zone Supplementary Planning Guidance). Therefore, the recommended Article 4 is ready to be taken forward.
- 8.3 An indicative timetable for making the recommended Article 4 is outlined below:

Task	Date	
Completion of justification and supporting documents	09/06/17	
Permission to make Article 4 direction and consult	DMT	19/06/17
	CLT	19/07/17
	MAB	08/08/17
	Cabinet	19/09/17
Public consultation	02/10/17 – 12/11/17	

Consideration of consultation responses, completion of final documents for confirmation		13/11/17 – 17/11/17
Permission to confirm Article 4 direction	DMT	27/11/17
	CMT	20/12/17
	MAB	16/01/18
	Cabinet	27/02/18
Publication of non-immediate Article 4 direction		01/06/18
Article 4 direction takes effect		01/06/19

- 8.4 In the event that re-consultation is necessary (this will generally be as a result of direction by the Secretary of State), an alternative indicative timetable is set out below:

Task		Date
Completion of justification and supporting documents		09/06/17
Permission to consult	DMT	12/06/17
	CMT	05/07/17
	MAB	18/08/17
	Cabinet	19/09/17
Public consultation		02/10/17 – 12/11/17
Consideration of consultation responses, preparation for re-consultation		13/11/17 – 24/11/17
Re-consultation period		27/11/17-07/01/18
Consideration of consultation responses, completion of final documents for confirmation		08/01/18 – 12/01/18
Permission to confirm Article 4 direction	DMT	22/01/18
	CMT	14/02/18
	MAB	06/03/18
	Cabinet	27/03/18
Publication of non-immediate Article 4 direction		01/06/18
Article 4 direction takes effect		01/06/19

Annex 1: Areas to be covered

It is proposed that the primary areas of focus for the Article 4 direction are the existing exemption areas which are:

1. The area in the west of the borough currently covered by an exemption which consists of the Central Activities Zone and the City Fringe OAPF area.

The following designations can be found within this existing boundary:

- Aldgate Preferred Office Location
- Around Tower Gateway East Preferred Office Location
- Around Tower Gateway South Preferred Office Location
- Around Tower Gateway West Preferred Office Location
- Bishopsgate Road Corridor Preferred Office Location
- Brick Lane District town centre
- Cambridge Heath Local Employment Location
- Cambridge Heath Neighbourhood town centre
- City Fringe Activity Area (partial)
- Columbia Road Neighbourhood town centre (partial)
- Redchurch Street Neighbourhood town centre
- Thomas More Neighbourhood town centre
- Whitechapel District town centre
- Whitechapel Local Employment Location

2. The area in the east of the borough currently covered by an exemption which consists of the Isle of Dogs CIL Charging area

The following designations can be found within this existing boundary:

- Barkantine Estate Neighbourhood town centre (partial)
- Canary Wharf Major town centre
- Canary Wharf Preferred Office Location
- Isle of Dogs Activity Area (excluding land south of 45 Millharbour and north of 1 Greenwich View Place)
- Poplar High Street Neighbourhood town centre (partial)
- South Quay Neighbourhood town centre

In addition to the existing exemption area, it is also proposed that the following locations are also included within the Article 4 direction:

- Blackwall Local Employment Location
- Cambridge Heath Local Employment Location (area not currently exempted)
- Cambridge Heath Neighbourhood town centre (area not currently exempted)
- Mile End Neighbourhood town centre
- Whitechapel Local Employment Location (area not currently exempted)

Annex 2: Justification for inclusion of additional areas

1. Cambridge Heath Local Employment Location & Cambridge Heath Neighbourhood town centre

This extension consists of just a few properties – the remainder of 2 Hare Row/513 Cambridge Heath Road; 222-278 Cambridge Heath Road; 281-289 Cambridge Heath Road; and the remainder of 67 Vyner Street. This would ensure consistency across the two Local Plan policy designations in Cambridge Heath (Local Employment Location and Neighbourhood Town Centre).

2. Mile End Neighbourhood town centre

This extension consists of the entirety of the Mile End Neighbourhood town centre. This is recommended by the Council's recent Employment Land Review due to its potential to absorb the future displacement of local and CAZ related businesses, along with having excellent connectivity.

3. Whitechapel Local Employment Location

This extension consists of the properties around Vine Court; land between Walden Street and Stepney Way; and land between Varden Street and Stepney Way. As well as ensuring consistency across the Local Plan designations (Local Employment Location and District Town Centre), this was also recommended by the Council's ELR.

Annex 3: Evidence Base & Supporting Information

- National Planning Policy Framework, DCLG, 2012
- City Fringe Opportunity Area Planning Framework, Greater London Authority, 2015
- The London Plan, The Spatial Development Strategy for London Consolidated With Alterations Since 2011, Greater London Authority, 2016
- Central Activities Zone Supplementary Planning Guidance, Greater London Authority, 2016
- Core Strategy, London Borough of Tower Hamlets, 2010
- Managing Development Document, London Borough of Tower Hamlets, 2013
- Tower Hamlets Employment Land Review, Peter Brett Associates, 2016
- Tower Hamlets Draft Local Plan 2031, London Borough of Tower Hamlets, 2016
- Preferred Office Location Boundary Review, Peter Brett Associates, 2017