

COMMITTEE CABINET	DATE 11 June 2008	CLASSIFICATION	Report No.	Agenda Item No.
Report of: Corporate Director, Development & Renewal Originating Officer: Jamie Ounan Strategic Planning Manager		TITLE: Draft City Fringe Opportunity Area Planning Framework: Response to Public Consultation Ward(s) affected: St Katharine's and Wapping, Whitechapel, Spitalfields and Banglatown, Weavers		

1. SUMMARY

- 1.1 The draft City Fringe Opportunity Area Planning Framework (CF OAPF) (appendix 1) sets out strategic planning guidance for the City Fringe proposed to be adopted by the Mayor of London. It has been researched, developed and drafted by the Greater London Authority (GLA). Although the document has been released for formal consultation, Tower Hamlets officers have been told that GLA staff do not consider this to be the final draft, but rather anticipate further joint working with boroughs to amend the CF OAPF before adoption.
- 1.2 It is proposed that appendix 2 of this report, subject to comments from the Cabinet, is Tower Hamlets' response to the consultation draft document. Appendix 2 strongly proposes that Tower Hamlets work with the Mayor and GLA staff to further develop the CF OAPF with the aim of endorsing the plan locally if it can be revised to address local priorities. However, Appendix 2 is also clear that the current draft CF OAPF cannot be endorsed at this stage as it does not yet align with Tower Hamlets priorities. Future endorsement will be subject to further review and Cabinet approval.

2 RECOMMENDATIONS

That Cabinet:-

Approve appendix 2 as Tower Hamlets formal response to the draft City Fringe Opportunity Area Planning Framework.

**Local Government Act, 1972 Section 100D (As amended)
List of "Background Papers" used in the preparation of this report**

Brief description of "back ground papers"

Name and telephone number of holder and address where open to inspection.

Nil

3 BACKGROUND

THE ROLE OF OPPORTUNITY AREA PLANNING FRAMEWORKS (OAPFs)

- 3.1 OAPFs are proactive planning tools to guide the implementation of London Plan policy, acting as aids to negotiation, consultation and implementation. OAPFs are *strategic* planning documents and are not intended to go into the level of detail of local Area Action Plans or master plans. OAPFs should not preclude the options appraisal process that all boroughs must undertake as part of their Local Development Framework (LDF) procedures¹. OAPFs are well placed to plan for cross borough issues such as infrastructure planning and delivery. Previous OAPFs, such as the Lower Lea Valley OAPF, have successfully addressed these matters. In the case of that particular OAPF it has been endorsed by Tower Hamlets.

DEVELOPING THE CITY FRINGE OPPORTUNITY AREA PLANNING FRAMEWORK

- 3.2 In 2004 the Mayor for London adopted the London Plan. That document named Aldgate & Whitechapel and Bishopsgate & South Shoreditch as Opportunity Areas within which substantial housing and employment growth could be achieved. As a council we indicated our support for those opportunity areas, as well as our intention to manage the growth through appropriate planning guidance. At the time, this was proposed to be a City Fringe Area Action Plan (since adopted as *interim guidance for the purposes of development control*). Tower Hamlets council planned for the City Fringe as a whole, including the named Opportunity Areas, due to the commonalities and interconnections between the issues, needs and places.
- 3.3 The GLA also recognised these interconnections between parts of Tower Hamlets' city fringe and our neighbouring authorities Hackney, Islington and the Corporation of London. Consequently, in 2005 GLA officers called a meeting of relevant local authority planning staff and stated their intention to deliver an Opportunity Area Planning Framework for the whole City Fringe. Several meetings took place to discuss the contents of a draft plan but no such meetings have taken place in the 3 years since 2005. The Cabinet should note that one of the main concerns raised in the attached response (appendix 2) is that the review and redrafting of the CF OAPF should be guided by a formal working group with borough representatives, using a model similar to the Lower Lea Valley OAPF. This will enable boroughs and the GLA to more effectively link regional and local priorities. Tower Hamlets officers have received confirmation from GLA staff that they would welcome this approach.

MAIN CONTENT OF THE DRAFT CITY FRINGE OPPORTUNITY AREA PLANNING FRAMEWORK

- 3.4 The CF OAPF includes the following chapters.

Implementing the London Plan

- This chapter sets out the legal basis for OAPFs. It notes that the CF OAPF aims to provide a further level of spatial detail from the generic London Plan policies. The Mayor sees it as necessary to provide such detail because the City Fringe has been identified as an area with significant opportunities for new homes and jobs which will contribute to London's growth as a whole. However, the vision, objectives and priorities are not clear. Appendix 2 raises concerns about this lack of clarity and ask the GLA to work with boroughs to agree the priorities, which must include the

¹ Please note: Tower Hamlets has been exploring and consulting upon key issues and options for its revised Core Strategy since September 2007. This work is planned to culminate in a general consultation exercise beginning at the end of July 2008.

priorities in Tower Hamlets City Fringe Area Action Plan (adopted as interim guidance for the purposes of development control).

Profiling the City Fringe

- This chapter sets out some ward-level statistics and maps relating to the City Fringe. Other existing spatial plans that affect the area are summarised. Historic maps and a brief socio-economic history is provided. A list of development sites in the area including permitted and refused schemes is included which is not appropriate for a strategic document. Appendix 2 therefore request that this is removed. The chapter concludes with a brief overview of some relevant local issues including development densities, the need for well planned and designed open space, energy usage and the reduction of carbon dioxide emissions. However, these issues are not always fully addresses. Consequently, Appendix 2 suggests that more joint work is undertaken to fully address these issues.

Connecting the City Fringe

- This chapter focuses on implementing a pedestrian movement network linked to the open space network in the City Fringe. This is the most detailed chapter and runs over 28 pages. Very specific routes are highlighted to improve walking routes between local destination points which will direct developments to facilitate specific routes through sites that would otherwise act as barriers to movement. The routes generally focus on linking designations such as major stations, open spaces and tourist attractions, like the Tower of London, and will be helpful when considering and shaping planning applications. The principle of creating a network of open spaces is also supported but beyond requiring some space from particular development opportunities, the way the green network will be delivered is not clear. Appendix two asks for this to be address and for the work to take account of Tower Hamlets vision for High Street 2012.

Tall and Large scale Buildings

- This chapter sets out areas where tall buildings are considered appropriate based on criteria. Areas include Broadgate / Bishopsgate, Aldgate and the News International site in Wapping. Appendix 2 supports Aldgate as a site appropriate for Tall Buildings as this will lead to substantial regeneration benefits. Appendix 2 questions whether the whole of the News International site meets the criteria for tall buildings set in the plan and raises protection of the setting of the Tower of London as a priority.

Mixed use policy in the City Fringe

- This chapter sets out how London Plan mixed use policy 3B.4 applies in the City Fringe. Several locations are defined as being exceptions to the mixed use policy including Aldgate which is appropriate for purely commercial development. Appendix 2 broadly supports the sites identified as being consistent with our local planning framework and evidence base.

Transport Strategy

- This chapter gives an overview of potential new demand for public transport from residential and employment growth but does not set out the specific implications for the current transport network. It lists transport improvement projects already committed or planned. Appendix 2 suggests the planned programme of transport investment supported by TfL needs to be clearly set out based on evidence of future demand. The CF OAPF also needs to help realise new opportunities arising from planning transport investment such as regeneration in Whitechapel and prioritise access to and between transport nodes including links at Whitechapel Station.

Creative Industries, culture, leisure and tourism

- This section very briefly sets out the importance of the creative industries cluster currently operating from the city fringe and a summary of their needs (i.e. affordable workspace). This is the least well worked up element of the document. It gives no clarity regarding the future role of the City Fringe as an area for the creative industries, culture or tourism or other small and medium sized enterprise. Consequently, Appendix 2 asks for a comprehensive review of chapter with LDA and local partners.

Housing and Social Infrastructure

- This chapter repeats relevant London Plan policies. It also sets out a series of broad design principles for high density residential development in the City Fringe. The chapter lists basic information regarding existing education facilities and some planned improvements to and health facilities but the GLA have not undertaken any research into the impact of housing growth on social infrastructure. Appendix 2 suggests Tower Hamlets (including colleagues in the Local Strategic Partnership) work with the GLA and neighbouring boroughs to ensure population growth and future demand for infrastructure is understood and planned for effectively.

Section 106 Strategy

- This chapter elaborates on the Mayor's wishes to develop voluntary arrangements with boroughs for the pooling of section 106 planning obligations. Specific values for office and residential development are included. However, the existing data is inaccurate and there is no justification for the rate of standard charges indicated in the plan or pooling arrangements. Appendix 2 indicates that any work on section 106 planning obligations needs to benefit local residents and link with the council priorities as set out in our Interim planning guidance for purposes of development control, Master Plans and the Community Plan.

Sustainability and Waste

- This chapter repeats several priorities set out in the London Plan regarding energy and waste management but actions to resolve these key issues are limited. Appendix 2 suggests better links be made to Tower Hamlets research work on appropriate locations for combined heat and power systems and, where possible, take account of the council's emerging priorities regarding waste management and recycling.

4 IMPLICATIONS FOR THE COUNCIL

- 4.1 The CF OAPF is prepared under the Mayor's general duty as set out in Section 30 of the Greater London Authority Act 1999. The Council's LDF documents are required to be in general conformity with the London Plan. Whilst the CF OAPF does not have the same legal weighting as the London Plan it will be a material consideration in the assessment of a planning application. Moreover, OAPFs should help to guide investment decisions and help secure funding for major projects such as infrastructure improvements.
- 4.2 The Council has agreed (Cabinet 5th December 2007) to prioritise the LDF Core Strategy and to enhance its focus on spatially specific, local issues and hence not to further progress the City Fringe Area Action Plan. Part of the reasoning was that much of the principles of in the Area Action Plan will be brought up into the Core Strategy and site specific information would be dealt with through a Site Specific Development Plan Document to compliment the Core Strategy. Nevertheless, a robust CF OAPF could be a useful, additional strategic planning tool, bringing together cross borough priorities and infrastructure investment. It could also be an informative material consideration when

making decisions on planning applications. As it stands the draft CF OAPF requires more work if it is to become a useful development control tool and forward planning tool.

- 4.3 Crucially, the document need to be consistent with Tower Hamlets interim planning guidance and the emerging draft LDF Core Strategy. Without consistency it is likely to lead to greater confusion on planning, regeneration and infrastructure delivery in one of Tower Hamlets important regeneration areas. Without further joint working there is a risk that the CF OAPF could lead to poorer quality development outcomes in the area. However, if the CF OAPF can be revised, through a substantial research, development and engagement process so that it does become a robust strategic planning tool, then the council could endorse the CF OAPF as strategic planning guidance. Without a robust redrafting process it will not be prudent to endorse the document.

5 CONCLUSIONS

- 5.1 The CF OAPF has the potential to be a useful, robust and proactive spatial planning tool. However, in its current draft format, it addressed a wide range of topics with a variable degree of success. It is also inconsistent with some local priorities and it is therefore at risk of leading to confusion on planning, regeneration and infrastructure delivery in one of Tower Hamlets important regeneration areas. Hence the council will need to engage closely, but robustly, with the GLA to ensure the plan is revised to clearly reflect Tower Hamlets aspirations and policy position for the City Fringe.

6 COMMENTS OF THE CHIEF FINANCIAL OFFICER

- 6.1 This report provides the background to the City Fringe Opportunity Area Planning Framework (CF OAPF) issued by the Mayor of London in 2008 and seeks Members approval for the council's draft response to the consultation draft City Fringe Opportunity Area Planning Framework.
- 6.2 A significant additional financial implication proposed in the CF OAPF is that development in the City Fringe should contribute towards a pooled system of section 106 planning obligations. In any such system Tower Hamlets would be a major contributor, given the level of development, along with the City of London. However, it is not possible at this stage to ascertain whether this borough would be a net beneficiary from the system given current information on infrastructure and other requirements in comparison to our City Fringe neighbors. In the absence of details on how the voluntary pooling arrangements would work in practice, the proposed response is, at this stage, not to support the approach.

7 CONCURRENT REPORT OF THE ASSISTANT CHIEF EXECUTIVE (LEGAL)

- 7.1 The OAPF is a non statutory planning document prepared under the Mayor's general duty as set out in Section 30 of the Greater London Authority Act 1999. Due to its status under the London Plan, the OAPF will have some material weight, and the Mayor intends that the OAPF will be endorsed by boroughs as a material consideration for the purposes of development control and plan making and would inform those processes.. For this reason it is important that the Council ensures that the OAPF reflects Tower Hamlets' aspirations and policy position.
- 7.2 The OAPF is not a Development Plan Document and therefore does not require the approval of the Council.

8 EQUAL OPPORTUNITIES IMPLICATIONS

- 8.1 The GLA has undertaken an Equalities Impact Assessment (EqIA).

9 ANTI-POVERTY IMPLICATIONS

- 9.1 The purpose of the should be CF OAPF is to attract inward investment and manage development activity to ensure growth meets the needs of new and existing communities. This needs to be made clearer in a revised draft.

10 SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 10.1 The GLA has undertaken a Sustainability Appraisal.

11 RISK MANAGEMENT IMPLICATIONS

- 11.1 No risk or regulatory impact assessment has been undertaken as part of the CF OAPF development process. Nor was there any consistent approach to project management to work through and manage risks with local stakeholders. Consequently, a formal project management structure, including risk management mechanism, is proposed to be put in place to undertake further development work on the CF OAPF.

12 APPENDICES

- 12.1 Appendix 1 - Consultation Draft City Fringe Opportunity Area Planning Framework (2008).
- 12.2 Appendix 2 - Tower Hamlets proposed response to the consultation draft City Fringe Opportunity Area Planning Framework (2008).

Appendix 1

Consultation Draft City Fringe Opportunity Area Planning Framework (2008)

Due to the size of the document and the related volume of printing, this document has been given a limited distribution on CD Rom. The document can also be accessed on the following website:

<http://www.london.gov.uk/mayor/planning/city-fringe.jsp>

or alternatively a hard copy can be obtained from the Strategic Planning Team: 020 7364 5414
jamie.ounan@towerhamlets.gov.uk.

Appendix 2

**Tower Hamlets proposed response to the consultation draft City Fringe Opportunity Area
Planning Framework (2008)**

Chapter	Section	Page No.	Issue	Proposed Change / Action
General Comment	General Comment	General Comment	Tower Hamlets recognises that the CF OAPF has been developed over a long period of time. During that time a range of key issues, plan policies and programmes have been researched, developed and delivered – including a revised Tower Hamlets Community Plan to 2020. Consequently, many parts of the CF OAPF have become out of step with local policy and actions. It is important that the OAPF reflects and brings together these policies and actions to help provide a coherent planning policy framework.	We propose to work with the GLA through a refreshed City Fringe OAPF Steering Group to provide a full list of relevant plans, policies and programmes, including the Community Plan. And that the priorities within these strategies be reflected as appropriate to make up part of the overall vision for the City Fringe
General Comment	General Comment	General Comment	At the start of the CF OAPF development process, a series of joint GLA-borough meetings were held to steer the project. These meetings have not taken place for 3 years.	We propose to work with the GLA through refreshed City Fringe OAPF Steering Group and sub-groups were appropriate, to steer the project and oversee further research and development work as necessary. The Lower Lea Valley OAPF governance model could be adapted for these purposes.
General Comment	General Comment	General Comment	Some of the evidence is out of date or incomplete, but can be addressed through better sharing of information between stakeholders	Joint working should include sharing our respective evidence and information as appropriate.
General Comment	General Comment	General Comment	The CF OAPF development process has taken place over a long period of time and would have benefited from more resources and clear coordination.	A shared project plan should be developed with the GLA-borough steering group which identifies the necessary resources from each stakeholder and a clear timeframe. Tower Hamlets is committed to working with the GLA and is willing to commit appropriate resources to the CF OAPF to ensure it is a robust document.
General Comment	General Comment	General Comment	The City Fringe has a wide range of local stakeholders. These stakeholders	An appropriate, efficient and effective programme of stakeholder engagement needs to be built into the CF

Chapter	Section	Page No.	Issue	Proposed Change / Action
General Comment	General Comment	General Comment	<p>need to be effectively engaged at appropriate times. Tower Hamlets and neighbouring boroughs have adopted Statements of Community Involvement to ensure effective engagement.</p> <p>Potential future endorsement of the CF OAPF.</p> <p>Tower Hamlets Core Strategy, and by association the City Fringe Area Action Plan, were withdrawn from submission in 2007. As such they have been adopted as interim guidance until the borough's Core Strategy is reviewed and formally adopted. Given the nature of the changes required to the Core Strategy (including the need to make it more spatially specific) the council has decided not to refresh the City Fringe Area Action Plan. That decision is, to some degree, based on the assumption that the CF OAPF can be endorsed as a robust strategic planning document and can be used as a material consideration in development and investment decisions.</p>	<p>OAPF redrafting process. This should have regard to borough's Statements of Community Involvement and undertaken through existing Local Strategic Partnership governance arrangements where possible.</p> <p>Tower Hamlets does not believe the CF OAPF is robust enough to endorse locally but propose further joint working to address all the comments above.</p>
1	General	General	<p>The purpose of the City Fringe Opportunity Area Planning Framework needs clarification.</p>	<p>Set out the specific need for an OAPF in the City Fringe including the priorities which need to be addressed. These should include a coordinated approach to infrastructure planning and improving local connectivity, as well as facilitating sustainable development that tackles deprivation by capturing the benefits of growth and investment for all communities.</p>
1	1.1	8	<p>A diagram to show the interrelated</p>	<p>Clarify the purpose of the diagram and rethink how it</p>

Chapter	Section	Page No.	Issue	Proposed Change / Action
1	map	9	<p>nature of spatial planning issues can be helpful. However, we seek clarification on the purpose of the diagram as, in its current format, it does not elaborate on the text in a meaningful way.</p> <p>The map helpfully defines the area at the start of the document. It is however, unclear why only the East London Line is represented on the map and not other land marks or infrastructure.</p>	<p>Remove the East London Line route to leave the aerial photo, City fringe boundary and borough boundaries.</p>
1	UDP diagrams	10	<p>Key elements of Tower Hamlets 1998 UDP were 'saved' in September 2007 in accordance with guidance from the Secretary of State.</p> <p>Tower Hamlets have also adopted Interim Planning Guidance for the Purposes of Development Control which sets out up to date strategic planning guidance and are being uses as material consideration on planning decisions.</p>	<p>Please refer to Tower Hamlets 1998 UDP (as saved September 2007).</p> <p>Please refer to Tower Hamlets (1) Core Strategy & Development Control Interim Guidance for the Purposes of Development Control and (2) City Fringe Area Action Plan Interim Guidance for the Purposes of Development Control.</p>
1	1.4	10	<p>The need for a consistent, cross-borough planning framework is beneficial as it provides clarity for investors in the area which places public authorities in the best position to attract and manage development to secure long term regeneration, high quality development and equitable community benefits.</p>	<p>Please reflect this sentence directly (or in other words) in 1.4</p>
1	General Policy Direction diagram & related text	14	<p>There is no clear, consensus-based vision for the City Fringe represented in the OAPF. The implementation of a strategic spatial plan is reliant on a wide range of stakeholders acting</p>	<p>The OAPF should set out a clear consensus-based vision. This can only be achieved by working in collaboration with local stakeholders. This should be linked to the London Plan and local planning documents, led by the proposed borough-GLA</p>

Chapter	Section	Page No.	Issue	Proposed Change / Action
1	General Policy Direction diagram & related text	14	<p>independently and collectively to achieve agreed goals. Without this clarity the strategy lacks a sense of purpose and risks not delivering the regeneration benefits needed in the area.</p> <p>The list of priorities have not been agreed by local stakeholders. Furthermore, broad statements such as 'community' provide no clarity as to the issues or the policy direction. Heritage, infrastructure, housing need and other key priorities are not mentioned.</p>	<p>steering group, based on priorities raised by a range of stakeholders and it should be subject to consultation.</p> <p>The OAPF should set out a clear list key local issues and the related policy direction should provide a robust and viable means of addressing those issues which can be used to inform other local planning documents, development decisions and ongoing management activities in the City Fringe. Clarity of the issues, policy and actions can only be achieved by working in collaboration with local stakeholders as per the proposed GLA-borough steering group.</p> <p>Tower Hamlets suggest that heritage, infrastructure, housing need and small business are key priorities. Modify the diagram accordingly.</p>
1	Diagram	16	<p>The diagram needs to more clearly show what types of documents have 'development plan' status – i.e. the starting point for determining planning applications – and what types of documents are 'material considerations'.</p>	<p>Use the most up to date information available in the 2007 IMD. Tower Hamlets has an extensive evidence base which can be shared with the GLA.</p> <p>The thread between local issues and the actions / policies proposed in the strategy needs to be clear and can be achieved by joint working with boroughs.</p>
2. Profiling the City Fringe	Tables of data	20	<p>This section uses the index of multiple deprivation (IMD) from 2000. This has been up dated in 2007.</p>	
2. Profiling the City Fringe	2.0	21	<p>The statistical analysis is limited both in its scope and its influence on the spatial strategy in the OAPF. By way of example, the analysis notes that Tower Hamlets wards are ranked as the most deprived in the area. However, this information is not used to inform the strategy / associated actions. Without</p>	

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			this link there is no sense of why particular actions are prioritised over others, nor is there clarity of purpose in the strategy.	
2. Profiling the City Fringe	General	30-34	The broader context (or story of place) would benefit from a more logical order, better local research, clearer focus on key issues for Tower Hamlets such as employment and skills as well as existing housing condition and housing need including homes for families.	Amend to include key issues for Tower Hamlets such as employment and skills, existing housing condition and housing need including homes for families
2. Profiling the City Fringe	2.4	36	It is inappropriate to include a list of detailed development outcomes for individual sites in a strategic planning document. It is particularly inappropriate to identify recent planning applications that have been deemed unacceptable and refused. The focus of the plan should be on setting principles to guide sustainable future development. Any analysis of past development decisions should be kept to background research papers.	Remove the table of development from the final adopted CF OAPF (it should be part of the evidence base). Ensure the focus of the plan is on setting principles to guide sustainable development.
3 Connecting the City Fringe	General	General	Tower Hamlets generally supports the principles and detailed linkages/routes shown in this chapter as they reflect the City Fringe Area Action Plan (adopted as interim guidance for the purposes of development control). The routes generally correctly focus on linking designations such as major stations, open spaces and tourist attractions, like the Tower of London, and will be helpful when considering and	None

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3 Connecting the City Fringe	General	General	shaping planning applications. The principle of creating a network of open spaces is also supported but beyond requiring some space from particular development opportunities, the way the green network will be delivered is not clear. Tower Hamlets assumes the delivery mechanism is primarily through on-site contributions from development sites, but this is not explicit. It is also assumed that some routes between spaces are to be 'greened' i.e. improved planting, but this also needs to be made more specific.	Make it explicit that sites are required to provide substantial on-site open space contributions. Be specific about what type of open space is expected. The type of open space should reflect the diverse needs of local residents and businesses and should include play space for young people of all ages. Tower Hamlets City Fringe Area Action Plan sets out specific guidance which should be reflected in the CF OAPF given the priority for open space in this area. Make it explicit which roads/paths need form 'green links' between open space and water space and establish and investment programme for these links. Ensure enhancement of existing open space is a priority for section 106 contributions and investment programmes.
3 Connecting the City Fringe	5 Aldgate	62-67	Tower Hamlets, in partnership with Design for London, TfL and other stakeholders has developed a vision for High Street 2012 (the A11) as one of our key area improvement projects linked to the 2012 Olympic and Paralympic Games.	Work with Tower Hamlets to include relevant principles of Tower Hamlets vision for High Street 2012 in the CF OAPF.
4. Tall Buildings	Diagrams	84 -85	Tower Hamlets question whether the whole of the News International site meets the criteria for tall buildings set in the plan.	Review this designation with the borough.
4. Tall Buildings	4.3	78	Protecting the setting of the Tower of London needs to be a priority.	Include the words, development should protect and enhance the setting of the Tower of London as a priority in accordance with the Tower World Heritage

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				Management Plan and planning policy (in para 4.3)
4. Tall Buildings	Diagrams	84 -85	Tower Hamlets supports Aldgate as a site appropriate for Tall Buildings as this will lead to substantial regeneration benefits	None
5. Mixed use	Diagram	92	Tower Hamlets supports Aldgate and the Bishopsgate Corridor as exceptions to the London Plan policy 3B.4.	None
5. Mixed use	Off site housing	93	Tower Hamlets objects to off site contributions to affordable housing as this is unlikely to lead to mixed and balanced communities.	Remove the reference to off site affordable housing.
5. Mixed use	General	90-93	The mixed-use policy needs to be better worded to ensure it reflects the GLA and borough's aspirations for the degree of residential development in any given mixed use scheme. It also needs to clarify any misinterpretations of the areas defined as potential exceptions to the mixed use policy.	Work with borough's clarify the intention and the wording of this chapter
5. Mixed use	General	90-93	Tower Hamlets has undertaken a Aldgate Property Study which should be used to inform the mixed use and small businesses policy for the area.	Work with the borough to review and use this study.
5. Mixed use	General	90-93	Tower Hamlets believe the Tower Gateway area is a specific exception to the mixed use policy given its excellent public transport connections, links to existing business clusters and high quality environment.	The areas closest to the station should be allocated for business usage/preferred office location and only facilitate mixed use schemes further away from the station.
6 Transport	General	General	The council supports links with our adopted Aldgate Master Plan	None
6. Transport	General	General	This section does not present any new proposals nor does it provide any	Work with TfL to undertake strategic transport capacity assessments for the City Fringe area and explore the

Chapter	Section	Page No.	Issue	Proposed Change / Action
			<p>analysis of the impact of the proposed working and residential population growth on the transport network. Although the area is supported by good public transport infrastructure it is an important part of any strategic planning document to link transport capacity to growth. Tower Hamlets prioritises evidence-based plans, policies and programmes. Without the evidence to explore the link between transport and development, growth may become unsustainable.</p>	<p>need for new and improved services, stations and interchanges where necessary.</p>
6. Transport	General	General	<p>The CF OAPF needs to help realise new opportunities arising from planning transport investment such as regeneration in Whitechapel. Specifically the plan also needs to prioritise access to and between transport nodes including links at Whitechapel Station.</p>	<p>Work with Tower Hamlets, TfL and Crossrail to gain agreement on the best way to integrate transport routes at Whitechapel. Reflect work undertaken as part of the Whitechapel Master Plan.</p>
7. Creative & Cultural Industries	7 general	104-105	<p>This section is the least well worked up element of the document. It gives limited clarity regarding the future role of the City Fringe as an area for the creative industries, culture or tourism. Consequently, it gives no direction on future delivery and implementation.</p>	<p>The LDA and local partners need to be engaged to develop a clear and deliverable strategy for cultural industries in the City Fringe. This topic should be a specialist sub-group of the proposed Steering Group for the CF OAPF. Where planning is not best placed to tackle the issues of the Creative Industries this should be acknowledged and the issues be addressed through other plans, policies and programmes including the LDA's Economic Development Plan for London.</p>
7. Creative & Cultural Industries	7 general	104-105	<p>Many Creative and Cultural Industries in the City Fringe are small and medium sized enterprise. Small and medium sized enterprises are an important part</p>	<p>Work with Tower Hamlets to align the priorities for small and medium enterprise set out in the City Fringe Area Action Plan with the OAPF.</p>

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8. Housing & Social Infrastructure	8 general	108-110	<p>of the City Fringe economy and character. This needs to be recognised in the OAPF.</p> <p>Tower Hamlets supports the approach of linking housing growth and infrastructure planning. This is a critical part of planning in any growth area.</p>	<p>Emphasise the following: Through the City Fringe OAPF, the Mayor and Boroughs will seek to ensure the capacity of all infrastructure is adequate to support development. Development should be accommodated by existing or planned infrastructure, or specific measures proposed by the applicant to increase infrastructure capacity (or reduce demand in relation to transport and utilities infrastructure). The individual and cumulative impact of development on all infrastructure will be taken into account (note: this is adapted from Tower Hamlets CP5 Core Strategy interim guidance adopted for the purposes of development control).</p>
8. Housing & Social Infrastructure	8.8, 8.11	109-110	The current list of existing infrastructure needs up dating.	<p>Work with Tower Hamlets strategic planning team and colleagues in the Local Strategic Partnership to set out the full list of existing and proposed new / regenerated schools, healthcare facilities and other critical social infrastructure.</p>
8. Housing & Social Infrastructure	8 general	108-110	<p>No process has been undertaken during the drafting of the CF OAPF to understand whether the existing cross-borough infrastructure is able to support the proposed growth.</p> <p>Tower Hamlets has undertaken much of this work during the preparation of the City Fringe Area Action (adopted for the purposes of development control). However, this needs to be reviewed to ensure it reflects the most up to date cross-borough demand and supply.</p>	<p>Use Tower Hamlets growth planning model as a basis for reviewing the future supply and demand for social infrastructure. Use this as the basis for establishing a programme of infrastructure investment. This should be costed and clear delivery mechanisms established.</p>

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8. Housing & Social Infrastructure	8 general	108-110	This chapter should be based on the most up to date housing need studies and strategic housing market assessments for the region, local areas and sub-regions. This should recognise the specific need for larger family housing in Tower Hamlets	Work with boroughs to share information on local and strategic housing need / market demand.
8. Housing & Social Infrastructure	8.2	108	Tower Hamlets supports the principle of mixed and balanced communities	None
8. Housing & Social Infrastructure	8.4	108	Tower Hamlets supports the design principles for high density living	None
8. Housing & Social Infrastructure	8.11	110	Tower Hamlets has recently undertaken detail research into the supply and demand of Student Accommodation in Tower Hamlets and East London. The Conclusions indicate that the periphery of Aldgate is an appropriate place for student accommodation linked with London Metropolitan University.	Work with Tower Hamlets to reflect the research conclusion for Student Accommodation in the CF OAPF.
9	Table	113	It is inappropriate to include a list of detailed development section 106 agreements in a strategic planning document. Although useful, this type of information is appropriate for the evidence base only. Confirm that number 8 and 9 are correct and we query 11 and 13. The figure for number 18 should be £2,000,000. Other sites s106 Agreements: <ul style="list-style-type: none"> • Horner Buildings, Lamb St, Commercial St & Brushfield St - £414,000 - 2004 	Remove this table from the final adopted CF OAPF (it should be part of the evidence base).

Chapter	Section	Page No.	Issue	Proposed Change / Action
9	9	112-113	<ul style="list-style-type: none"> Royal Mail Depot, Greatorex St - £134,000 - 2005 Prescot St & South Tenter St - £86,000 - 2007 Whitechapel High St, Colchester St, Buckle St & Braham St - £430,000 - 2007. <p>Specific values for office and residential development are included. However, there is no justification for the rate of standard charges indicated.</p>	<p>More research needs to be undertaken to find a suitable level of standard charging based on needs arising from the cumulative impact of the development and the impact of such a charge on the viability of investment.</p>
9	9	112-113	<p>The proposal for voluntary pooling arrangements does not provide any detail regarding how such arrangements could or should be managed. Such arrangements are complex and require a great deal of coordination. Without further information on such arrangements or a proposed mechanism for discussion such arrangements Tower Hamlets cannot support the voluntary pooling.</p>	<p>Work with borough to explore issues and options for capturing and managing section 106 to ensure the greatest possible community benefit in accordance with Government Circular 05/05 and emerging arrangements for a Community Infrastructure Levy.</p>
9	Table of investment projects	114	<p>Tower Hamlets supports the inclusion of a list of priority projects for section 106 planning obligations. However, the must benefit local residents. Therefore they should include Tower Hamlets strategic priorities as set out in local documents including Interim planning guidance for purposes of development control, Master Plans and the Community Plan. These priorities must also conform with the principles set out in Government</p>	<p>Work with Tower Hamlets and neighbouring boroughs to identify and agree an appropriate list of projects suitable for s106 investment and investment from other sources including other regeneration funds.</p> <p>In accordance with good practice, as undertaken with the Lower Lea Valley OAPF, this list of necessary projects should be costed and suitable delivery arrangements agreed among all partners.</p>

Chapter	Section	Page No.	Issue	Proposed Change / Action
10. Sustainability & Waste	10	116-118	<p>Circular 05/05.</p> <p>This chapter repeats several priorities set out in the London Plan regarding energy and waste management but actions to resolve these key issues are limited. Tower Hamlets is committed to sustainable growth and has therefore undertaken detailed research work on appropriate locations for combined heat and power systems and other renewable forms of energy (this work is robust and has been short listed for an RTP1 Planning Award).</p> <p>The council is also reviewing its sustainable waste management strategy.</p>	<p>Use Tower Hamlets research on suitable locations for renewable energy to set spatial priorities for the inclusion of renewable energy in new development. Where possible apply the methodology used to the rest of the City Fringe area.</p>
10. Sustainability & Waste	10	116-118		<p>This review should be aligned with any proposals set out in the CF OAPF.</p>