

**LONDON BOROUGH OF TOWER HAMLETS
LEASIDE AREA ACTION PLAN REGULATION 18 AND
TALL BUILDINGS SUPPLEMENTARY PLANNING DOCUMENT
CONSULTATIONS**

Presented by the Head of Planning

SUMMARY

The London Borough of Tower Hamlets are consulting on two planning documents; the Leaside Area Action Plan Regulation 18 version and the Tall Buildings Supplementary Planning Document. Both are relevant to future development within the eastern part of the Borough and will therefore have the potential to impact on areas of the Regional Park at East India Dock Basin, Bow Creek Ecology Park, the towpath associated with the Limehouse Cut and future delivery of the Lea River Park.

Officers commented on an earlier formative stage of the Area Action Plan and the Authority's proposed comments, as set out in the letter attached as Appendix A to this report acknowledge changes made in response, but identify further areas where amendments are sought. Comments on the Tall Buildings Supplementary Planning Document are largely supportive given the underpinning principles for the location, development and scale of new buildings cover those areas most of concern to the Park Authority.

RECOMMENDATION

Members Approve: (1) the comments as set out in Appendix A to this report as the Authority's formal response to consultations by the London Borough of Tower Hamlets on the Leaside Area Action Plan and the Tall Buildings Supplementary Planning Document.

BACKGROUND

1 The London Borough of Tower Hamlets (LBTH) are consulting on the Leaside Area Action Plan (AAP) Regulation 18 version. This draft document sets out a proposed vision for the area, followed by a number of site allocations and planning policies which cover a range of topics including housing, employment, connectivity, community and open spaces, environment and sustainability.

Once adopted it will form part of the development plan and the policies it contains will be a material consideration in planning decisions.

- 2 Separately the Council is also holding a consultation on the proposed Tall Buildings Supplementary Planning Document (SPD). This sets out detailed guidance on the implementation of policies in the Tower Hamlets Local Plan 2031 and in particular Local Plan Policy D.DH6 'Tall Buildings'. The final Tall Buildings SPD will, alongside the Local Plan, form a material consideration in determining applications for tall buildings in the Borough. The two documents overlap in that the SPD provides guidance for sites that lie within the Leaside area where there are opportunities for tall buildings.
- 3 **Location and Context**

The Leaside AAP area is located to the eastern side of Tower Hamlets and covers an area of approximately 152 hectares. The River Lea forms the eastern boundary of the area, and the boundary between Tower Hamlets and Newham. Please refer to the plan at Appendix B to this report. The AAP consists of two distinct 'Places' (as defined in the Local Plan); Poplar Riverside and Leamouth. The area also contains parts of two Opportunity Areas (OAs) – Poplar Riverside and the Isle of Dogs and South Poplar; identified in the London Plan as areas with significant capacity for accommodating new housing, commercial development and infrastructure.
- 4 The AAP contains a substantial proportion of waterside frontage – along the Limehouse Cut in the north, the River Lea to the east and with the River Thames along its southern edges. In the south it also includes Trinity Buoy Wharf, East India Dock Basin and Orchard Wharf – the latter is designated a safeguarded wharf, protected specifically for waterborne freight-handling uses. Until recently Leamouth was comprised of a series of low to medium-rise industrial units along the Thames. However, it is now a designated tall building zone under the Local Plan and has seen significant new development, including a new mixed-use neighbourhood on City Island, and under-construction projects at Goodluck Hope.
- 5 The Tall Buildings SPD provides further detail on the potential for tall buildings and their height within the five tall buildings zones designated in the Local Plan, please refer to Appendix C to this report. It responds to the requirement within the London Plan to identify locations where tall buildings are appropriate in principle. The SPD is informed by an understanding of the heritage, spatial arrangement, character and townscape of different parts of the borough and by the Local Plan vision for growth and the current development pipeline across the borough. It should be noted that the Local Plan defines a tall building as *“any building that is significantly taller than its local context and/or has a significant impact on the skyline. Within the borough, buildings of more than 30 metres, or those which are more than twice the height of surrounding buildings (whichever is the lesser) will be considered to be a tall building”*. The Regional Park area within Tower Hamlets is located within two of the sub-areas defined within the SPD – the Isle of Dogs and South Poplar area and the Lower Lea Valley.
- 6 The area defined by the AAP boundary includes a key site within the Regional Park – East India Dock Basin, with a second site - the Bow Creek Ecology Park adjoining but outside the AAP boundary just to the north. The Park boundary also includes the towpath associated with the Limehouse Cut part of which sits within the AAP. The Authority's adopted Park Development Framework (PDF) Area 1 Proposals apply to the Park within Tower Hamlets. These highlight the

importance of improving and delivering access improvements into the Park, linking with DLR and underground stations, and securing enhancements to associated open and waterside spaces, in particular East India Dock Basin. Proposals also support the development and delivery of the Lea River Park.

7 Leaside AAP

The AAP policies and guidance seek to address a series of challenges and associated opportunities. These are grouped under the following headings.

- **Poor accessibility and spatial severance** – due to physical barriers such as the A12, River Lea and DLR lines.
- **Population growth and change** - the wards within the AAP area are projected to see their population rise by more than the borough average of 29% between 2015 and 2030. The Council are seeking to deliver 8,250 new homes in the AAP area by 2032 (Policy LS1). This level of inward investment presents opportunities to improve the local area but will also create pressure on existing services and facilities.
- **Access to green spaces and nature** - large swathes of the core area are currently classified as deficient in access to green space and access to nature. As the population grows over the next 15 years, the amount of open space available per person is projected to decrease even further. East India Dock Basin, and new open space being delivered on the Leven Road site allocation, along the River Lea are considered “the backbone of a green network” as new open spaces and green connections come forward in line with the Council's Green Grid Strategy. East India Dock Basin is also recognised as providing important ecological services that need to be protected. The AAP states that the delivery of open space across the AAP area will need to be carefully managed to ensure that pressure from an increased number of visitors does not overwhelm ecologically sensitive sites.
- **Environmental quality and flood risk** – air quality is poor particularly on and adjacent to major roads in the area. Improvements in the chemical quality of the water in the River Lea has been noted, but more work is needed to raise its overall quality. The AAP provides an opportunity to manage flood risk given much of its area is within a flood risk area, due to its proximity to the rivers Thames and Lea.

8 Tall Buildings SPD

The SPD guidance is based upon a comprehensive list of tall building objectives and accompanying principles which flow from three core aims:

- responding to character and place;
- contributing to quality places;
- delivering regeneration and economic growth.

9 Important principles in terms of the relationship between tall buildings and the Regional Park include Principle 6, which states that tall buildings can play an important role in enhancing legibility and strengthening identity of place. Other Principles of relevance include:

- Principle 7 - the design of tall buildings must respond to place and local

distinctiveness;

- tall building proposals should respond: effectively and sensitively to heritage assets under Principle 8, sensitively to areas of lower scale context under Principle 9, and respond sensitively to the Borough's blue and green infrastructure under Principle 10;
- Principle 22 recognises the need to ensure developments with tall buildings incorporate open space and green infrastructure to enhance the living environment, increase biodiversity, manage surface water and mitigate urban heat island effects;
- Principle 26 focuses on the need for tall building design to consider minimising light pollution at night and glare from the sun during the day.

10 **Next Steps**

Officers responded to an earlier draft version of the AAP when an initial round of consultation, online surveys and events took place during the Spring 2021. The Authority's draft letter attached as Appendix A to this report acknowledges the changes made to the AAP in response to these comments but identifies further areas where change or clarification of policy guidance is sought. The Council intend to hold a Regulation 19 consultation later in the year on a final draft of the AAP before it is submitted for independent examination.

- 11 The Authority's draft letter also includes comments on the Tall Buildings SPD in relation to the 'tall buildings objectives and principles' and the guidance presented for specific areas – Leamouth and the Lower Lea Valley. No timescale is given for the adoption of a final version of the SPD.

COMMENTS ON AREA ACTION PLAN

12 **Vision for Leaside**

Three themes underpin the Vision for Leaside; 'Social Cohesion', 'Connectivity' and 'Sustainability' and the vision statements for each can be welcomed; they include positive statements for opening up access to the River Lea, and connections through to Olympic Park, for improving air quality, green and blue infrastructure and for protecting and enhancing biodiversity. A tension remains however, in terms of providing improved access whilst also seeking to enhance biodiversity and this has been acknowledged by the Council in response to the officer level comments made previously. The Council propose that this pressure on the existing sites of biodiversity value can be reduced by improving connectivity and access to other open spaces, whilst also working to secure increased biodiversity throughout the area.

13 **Housing Delivery and Employment**

The Council see new residential development leading the transformation of the Leaside area from a relatively isolated section of the borough to an area where work, retail, and leisure opportunities are integrated with new and established communities. Policy LS1 'Leaside Housing Delivery' identifies a mix of estate regeneration, development on brownfield land and redevelopment of industrial land to enable residential uses in combination with continued industrial use as the means of achieving this ambition.

- 14 Of relevance to the Regional Park are the principles set out within the AAP for the co-location of residential and employment uses on the Leamouth Road Depot and on the safeguarded Orchard Wharf. Both sites sit outside but adjacent to the land within the Regional Park, Bow Creek Ecology Park and

East India Dock respectively. The site allocations for each set out design and layout principles, connectivity improvements and infrastructure and delivery guidelines.

15 Site LS-G Leamouth Road Depot

The Leamouth Road Council Vehicle Depot (Site LS-G) borders the River Lea on its eastern boundary with the Bow Creek Ecology Park beyond. Please refer to the plan at Appendix D to this report. The site allocation indicates suitability for the co-location of residential uses – 471 new homes, with a redeveloped depot. The 2.2ha site is also located within the Tall Buildings Zone and a range of building heights are proposed 15-20 storeys and for shorter buildings 3 – 8 storeys.

16 This site allocation provides an opportunity to secure a more environmentally sensitive and attractive treatment across the whole site but particularly to the waterside edge as part of the wider site redevelopment. This would enable issues such as air quality, noise pollution, habitat creation and buffer planting to be addressed in relation to the Bow Creek Ecology Park. High standards of design and appropriate setbacks from the water's edge would be required in accordance with PDF Area 1 Proposals particularly if tall buildings are proposed – these would need to step down towards the water's edge in line with policy guidance in the AAP and the draft Tall Buildings SPD.

17 The Site allocation should make reference to the proximity of the Bow Creek Ecology Park and ensure that any future development contributes via S106/CIL to the mitigation of any adverse impacts on the Ecology Park and to enhancing and improving the biodiversity of the site and its river corridor. Amendments are sought to cover the above points and this is set out in the draft letter attached as Appendix A to this report.

18 Site LS – D Orchard Wharf

The Site Allocation for Orchard Wharf identifies the significance of East India Dock Basin in terms of its heritage and biodiversity and highlights the need for sensitive treatment from new neighbouring development. It also recognises that the development may be required to mitigate for the impact of additional visitors on the biodiversity of the site. This guidance is welcomed and supported. As a site located within the Tall Building Zone and adjacent to water the site allocation principles should include a clear statement that development will need to step down adjacent to waterways and waterbodies, such as the Basin. Currently the guidance only considers a step down in relation to the River Thames. Furthermore this stepping down will need to be considered in the context of local character and land use an important factor in terms of the ecology heritage and visitor use of the Basin.

19 Movement and Connectivity

Policy LS8 'Movement and Connectivity Improvements' is to be supported – it is seeking to overcome a number of connectivity barriers, particularly large roads and to simplify the often convoluted pedestrian and cycle routes between areas and sites. The Council recognise that only limited change will be possible to the A13 and A12 over the lifetime of the AAP given these are strategic road links, and has therefore directed policy towards the process of reorienting the movement hierarchy away from motor vehicles and towards active transport.

20 All development will be expected to contribute to the work of improving the quality and connectivity of walking and cycling routes in the AAP area and this

policy focus is welcomed. Part C of the Policy identifies a number of new pedestrian and cycle bridge crossings of the River Lea that will open up access between Tower Hamlets and Newham. These crossings will also improve access to public transport hubs, such as Canning Town, Star Lane and West Ham, and east west movement generally, which will benefit visitors to the Park. The London Boroughs of Tower Hamlets and Newham are working closely together and with other stakeholders to ensure these bridge links and east - west connections can be delivered through the joint Lower Lea Valley Regeneration Board. Officers of the Authority have attended this Board and are working with both Councils to improve access to and between the Park at East India Dock Basin, Bow Creek, and along the River Lea through to Olympic Park in the north.

- 21 Policy LS11 'Access to Waterfronts' seeks to deliver the development of continuous riverside paths along the River Lea and River Thames and to ensure public access to the waterfront is secured as part of development. This is to be welcomed and Part C of the Policy supported as this requires appropriate planting to be included to create semi-natural green corridors. Policy should also ensure however, that sufficient space is provided and development is set back from the waterfront so that the both access requirements and provision for wildlife can be achieved. Otherwise improving public access to and along the waterfront will be difficult to achieve in tandem with improvements to waterside habitats. This would be in accordance with the Authority's PDF Area 1 Proposals which state that *"Appropriate set-backs from the water's edge will be sought alongside the towpath and other waterside paths; development should enhance expression and presence of the watercourses."* (Environment Proposals 1.A.2).
- 22 **Environment and Community – Urban Greening and Open Space**
The Authority's Area 1 Proposals highlight the need to work in partnership with Tower Hamlets and the Canal & River Trust to encourage habitat enhancements along the Limehouse Cut. Proposals also seek to protect and enhance ecological interest along the route of the Lea River Park together with the provision of appropriate interpretation.
- 23 The AAP Policy LS15 'Urban Greening Factor' seeks to incentivise developers to provide biodiversity improvements to the River Lea and Limehouse Cut canal by allowing them to count these improvements towards their Urban Greening Factor score. This is a positive proposal providing the biodiversity improvements can be sustained over time and are robust enough to cope with the pressure placed upon the waterside environment in terms of access, impacts from development etc. The AAP should provide a strategic approach for biodiversity and habitat creation or renewal to ensure the waterways act as an inter-connected corridor habitat linking with habitats within development and existing open and waterside space.
- 24 The AAP recognises that there is a need for more open space and a network of green spaces within the area. It also recognises the increasing pressure being faced by existing parks and open spaces such as East India Dock Basin and the impact this pressure can have on biodiversity. Policy LS17 'Delivery of Open Space' is therefore to be welcomed. It supports the delivery of further open spaces and the expansion of existing, in order to provide diverse typologies of open space to meet the requirements of new residents and employees. Space for nature and food growing are also required as these contribute to general well-being.

COMMENTS ON THE TALL BUILDINGS SPD

- 25 The Tall Buildings Supplementary Planning Document adds an extra level of detailed guidance focused on tall buildings. Given the scale and quantum of development coming forward within Tower Hamlets and the planning applications the Authority has already considered in relation to the Regional Park this is a welcome addition to the policy resource. Once adopted the SPD will form a material consideration in determining applications for tall buildings in the Borough.
- 26 The SPD needs to ensure the design and location of tall buildings can respond positively to the Regional Park and its landscape character. The range of aims, objectives and principles set out in Section 4 of the SPD are comprehensive and if applied to new proposals should assist in enhancing the Park and avoid detrimental impact on its ecological and heritage assets. The letter attached as Appendix A to this report therefore offers support for the relevant principles and refers back to the Orchard Wharf application as an example of the issues raised by tall buildings in close proximity to the Regional Park.

ENVIRONMENTAL IMPLICATIONS

- 27 There are no environmental implications arising directly from the recommendations in this report but the draft Leaside AAP and the Tall Buildings SPD once adopted will contain policies and guidance that will help determine the development and the use of land within the borough that could have an impact on the protection, enhancement, and development of the Regional Park.

FINANCIAL IMPLICATIONS

- 28 There are no financial implications arising directly from the recommendations in this report.

HUMAN RESOURCE IMPLICATIONS

- 29 There are no human resource implications arising directly from the recommendations in this report.

LEGAL IMPLICATIONS

- 30 Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966 (the Park Act). The Park Act requires a local planning authority to consult with the Authority on any planning application for development, whether within the designated area of the Park or not, which might affect any part of the Park.
- 31 The Park Act enables the Authority to make representations to the local planning authority which they shall take into account when determining the planning application.

RISK MANAGEMENT IMPLICATIONS

- 32 There are no risk management implications arising directly from the recommendations in this report.

EQUALITY IMPLICATIONS

- 33 There are no equality implications arising directly from the recommendations in this report.

Author: Claire Martin, 01992 709885, cmartin@leevalleypark.org.uk

BACKGROUND REPORTS

The London Borough Tower Hamlets Consultation on November 2021
the Leaside Area Action Plan Regulation 18 version
The London Borough Tower Hamlets Consultation on November 2021
the Tall Buildings Supplementary Planning Document

APPENDICES ATTACHED

Appendix A The Authority's draft response to the London Borough of Tower Hamlets
Appendix B Plan showing the Park area within the Leaside Area Action Plan
Appendix C Extract from SPD showing Tall Building Zones
Appendix D Plan showing site allocations for Leamouth Road Depot and Orchard Wharf as presented in the Leaside AAP

LIST OF ABBREVIATIONS

| | |
|--------------|--|
| PDF | Park Development Framework |
| SPD | Supplementary Planning Document |
| AAP | Area Action Plan |
| SINC | Site of Importance for Nature Conservation |
| LBTH | London Borough of Tower Hamlets |
| OA | Opportunity Areas |
| DLR | Dockland Light Railway |
| EIDB | East India Dock Basin |
| HLF | Heritage Lottery Fund |
| the Park Act | Lee Valley Regional Park Act 1966 |



Steven Heywood
Principal Planning Officer
Strategic Planning Team
London Borough of Tower Hamlets
Tower Hamlets Town Hall,
Mulberry Place, Clove Crescent,
London,
E14 2BG

Email: cmartin@leevalleypark.org.uk
Direct Dial: 01992 709885

20 January 2022

Dear Steven

RE: CONSULTATION ON THE LONDON BOROUGH OF TOWER HAMLETS LEASIDE AREA ACTION PLAN REG 18 VERSION AND THE TALL BUILDINGS SUPPLEMENTARY PLANNING DOCUMENT - LEE VALLEY REGIONAL PARK AUTHORITY COMMENTS

Thank you for consulting the Regional Park Authority on the Leaside Area Action Plan Regulation 18 version and the Tall Buildings Supplementary Planning Document. A report on these matters was considered by the Authority's Members, at the Lee Valley Regeneration and Planning Committee on the 20th January 2022, when the following comments were agreed.

The Authority is aware of the transformational changes underway within this area of the Borough and welcomes the production of an AAP to plan for and manage this process in accordance with Local Plan policy. The comments set out below are focused on those aspects of the planning framework most relevant to the Regional Park; residential development; its scale and location, connectivity, biodiversity and open space provision and follow on from previous officer level comments made earlier last year. Comments on the Tall Buildings SPD are made separately although of course there is overlap between the two documents, as the SPD provides guidance for sites that lie within the Leaside area and adjacent to the Regional Park where there are opportunities for tall buildings.

LEASIDE AREA ACTION PLAN

As you are aware from previous comments the AAP boundary includes and borders key sites within the Regional Park – namely East India Dock Basin, with a second site to the north - the Bow Creek Ecology Park adjoining but outside the AAP. The Park boundary also includes the towpath associated with the Limehouse Cut part of which sits within the northern part of the AAP. The Authority's adopted Park Development Framework (PDF) Area 1 Proposals apply to the Park within Tower Hamlets. These highlight the importance of improving and delivering access improvements into the Park, linking with DLR and underground stations, and securing enhancements to associated open and waterside spaces, in particular East India Dock Basin. Proposals also support the development and delivery of the Lea River Park.

Joint working between officers from both the Park Authority and Tower Hamlets last year resulted in the adoption of a shared Vision for East India Dock Basin (EIDB). This has set a framework for ongoing collaboration to enable future enhancements within the Basin to be secured for the benefit of visitors and local people together with improvements that will protect the unique combination of ecological and heritage resources that help to make this open space so special. Joint working is continuing to secure a HLF bid. This will seek to remediate siltation in the basin, provide a visitor facility helping to interpret the site and to highlight and improve a range of heritage and biodiversity features. The Authority has commissioned feasibility work to identify proposals and costs for silt removal/disposal and for repair works to the gates in order to reduce future siltation issues.

The AAP Vision

The Authority supports the three themes underpinning the 'Vision for Leaside' and the positive statements for opening up access to the River Lea, and connections through to Olympic Park, for improving air quality, green and blue infrastructure and for protecting and enhancing biodiversity; with the status of East India Dock Basin enhanced.

Throughout the AAP however, a tension exists between the provision of improved access and proposals to enhance biodiversity. For example, between safeguarding and enhancing biodiversity as part of a 'Sustainable Leaside' (where *"biodiversity on the River Lea and the Limehouse Cut canal will be flourishing"*) and improving access as part of 'A Connected Leaside' which seeks, the *"redevelopment of waterfront industrial sites and the opening up access to the River Lea, creating an almost continuous path from the Olympic Park to the mouth of the river"*.

This tension has been acknowledged by the Council in their 'Consultation Response Report' Nov 2021, and the Authority endorses the Council's response that there is a need *"to take pressure off the more biodiverse open spaces in the region through improved connectivity and access to other open spaces, and increased biodiversity throughout the area"*. This will need to be reflected in the site allocations to ensure new open spaces and biodiversity is delivered as part of development and co-location of residential and employment uses.

It would also be helpful, if the Council included Sites of Importance for Nature Conservation (SINCs) within the category of important designations to be identified on or adjacent to the development sites, as part of the pro-forma for the Site Allocations.

Housing, Employment, tall buildings, waterfront development

The AAP includes allocations for housing and employment uses and their co-location on sites adjacent to the Regional Park – Site LS-G Leamouth Road Depot and LS-D Orchard Wharf.

The Context section of the Orchard Wharf allocation identifies from the outset the relationship between the Regional Park and the Orchard Wharf site immediately to the east and the significance of East India Dock Basin in terms of its heritage and biodiversity. It highlights the need for sensitive treatment from new neighbouring development and states *"effort may be required to mitigate impact of additional visitor on the biodiversity of the site"*. This guidance takes on board previous officer comments and is welcomed and supported.

A similar treatment is required for the Leamouth Depot allocation – the Context Section should include reference to the Regional Park opposite – Bow Creek Ecology Park. Given the proximity, redevelopment of the Depot site will need to consider its impacts on the Ecology Park.

Both sites are part of the Tall Building Zone and sit adjacent to water. The Design and Layout Principles refer in both cases to the need to make a positive contribution to the waterfront, but the AAP should include a clear statement that development will need to step down adjacent to both waterways and waterbodies, such as the Basin. Furthermore, this stepping down will need to be considered in the context of local character and land use. Stepping down from very tall buildings (30 stories for example) can still result in tall blocks adjacent to the water space where these will dominate, and have an overbearing presence. This principle is supported by guidance within the Tall Buildings SPD under para 5.5.32.

The Authority supports the commitment outlined in the Infrastructure and Delivery Principles for Orchard Wharf to securing developer contributions *“through S106 agreements or CIL payments to mitigating any impacts upon and improving the ecology and biodiversity of the East India Dock Basin, including improvement works to permanently de-silt the basin.”* Likewise, the principles are helpful in recognising that any development proposals will need to consider the quantity and impact of additional visitors to East India Dock Basin given its status as a Site of Importance for Nature Conservation (SINC) and if necessary *“demonstrate suitable mitigation measures”*. This position is fully endorsed – as previously raised with officers, the current proposals for the Orchard Wharf redevelopment could see an additional 2,300 new residents on the doorstep of the Basin. This would be unsustainable in terms of the sites function as a visitor attraction and important site for nature conservation.

A similar approach within the site allocation for the Leamouth Depot would be helpful in relation to the Bow Creek Ecology Park. It is recognised that this site sits within the Borough of Newham but the redevelopment of the Leamouth Depot will greatly influence the conditions on the Ecology Park. For example, the design and height of development will impact visual amenity on site, there are issues for habitats and wildlife from shading, light, noise and water pollution and from disturbance due to additional footfall. Design and Layout Principles refer to development making a positive contribution to the River Lea waterfront including through biodiversity enhancements and this is welcomed. However, there should be a statement under the infrastructure and Delivery section that developer contributions will be sought to mitigate any adverse impacts upon the ecology and access to nature opportunities provided by the Ecology Park.

Movement and Connectivity

Policy LS8 ‘Movement and Connectivity Improvements’ is supported as is the Council’s focus on improving east west movement for pedestrians and cyclists, connections through to public transport hubs and the provision of new bridge links across the River Lea into Newham. These measures will cumulatively and over time help visitors and residents to access the Regional Park and move more easily between areas and sites – for example from East India Dock Basin through to Three Mills.

Waterside paths, riverside paths and towpaths are an important part of the access network within the Leaside area and within the Regional Park as a whole. The River Lea and other linear extensions along the Limehouse Cut for example connect key open spaces, heritage assets and ecologically important habitats within the Park and through into the Queen Elizabeth Olympic Park. The aim of Policy LS11 ‘Access to Waterfronts’ is welcomed in that it seeks to deliver the development of continuous riverside paths along the River Lea and River Thames and to ensure public access to the waterfront is secured as part of development. Part C of the policy is supported; it requires these paths incorporate appropriate planting to create semi-natural green corridors to benefit nature. This policy overlaps to some extent with Policy LS4 ‘Residential Development along Waterfronts’ which seeks to ensure development contributes to the creation and enhancement of publicly accessible paths along waterways.

However fundamental to both these policies is the provision of sufficient space to achieve both an access route for people and provision for wildlife. Policy should ensure that development is set back from the waterfront so that the needs of both can be met. Improving public access to and along the waterfront will be difficult to achieve in tandem with improvements to waterside habitats. Limiting access to one side of the waterfront would provide more opportunity for biodiversity and the creation of habitat, especially if areas adjacent to the waterway can remain unlit at night or if light spill can be limited. Sufficient resources will also need to be secured for management and maintenance of paths and habitats over the long term.

Urban Greening Factor and Open Space

The proposal to allow off site biodiversity improvements to the River Lea and Limehouse Cut to count towards a developments Urban Greening Factor score is provisionally supported, providing this does not undermine on-site improvements, (Policy LS15.) It is noted that at least 50% of the area counted towards the Urban Greening Factor score must be on-site but it will be important to give equal weight to the quality, sustainability and long term viability of these improvements, whether off or on-site. The longevity of biodiversity improvements and robustness of habitat creation within these areas will need to be carefully considered and monitored. As officers have previously commented it is important to ensure that a strategic overview or approach is in place for biodiversity and habitat creation or renewal. This is to ensure the waterways act as an inter-connected corridor habitat linking with habitats within development and existing open and waterside space.

Policy LS17 Delivery of Open Space is supported; there is a great need for new development to provide sufficient and diverse typologies of open space to meet the requirements of new residents and employees as well as space for nature and landscapes that contribute to general well-being. The AAP recognises that open spaces such as East India Dock Basin will not cope well with ever increasing visitor pressure and that additional development of green space is required throughout the area. The Authority endorses this approach. It is also important that the river corridor does not become the de facto green space for all the development and estate renewal coming forward and that development, particularly that adjacent to the waterways, provides sufficient spaces to cater for the needs of new residents. In this respect the Leamouth Depot site allocation should be revised to include delivery of new open space in accordance with Policy LS17.

TALL BUILDINGS SPD

The Tall Buildings Supplementary Planning Document is welcomed and the guidance it provides for the planning and design of tall buildings within the Borough will be important in ensuring development contributes to high quality places that can enhance people's quality of life and well-being. The Authority notes that the SPD once adopted will form a material consideration in determining applications for tall buildings in the Borough.

The Authority's concerns are focused on the how tall buildings interact with the Regional Park in terms of its environment and character and the use of its open and waterside spaces. The SPD needs to ensure the design and location of tall buildings can respond positively to the Regional Park and its landscape character. The Regional Park area within Tower Hamlets is located within two of the sub-areas defined within the SPD – the Isle of Dogs and South Poplar area (which includes East India Dock Basin) and the Lower Lea Valley.

Within Tower Hamlets the Regional Park exists as areas of valuable open and waterside space (blue and green infrastructure) encompassing important and designated ecological and heritage assets linked by waterside paths strongly defined by the River Lea. The surrounding environment or townscape is largely built up and already contains buildings of considerable

height. As a statutory consultee responding to development proposals the Authority is seeking to influence the design and layout of proposals so that they enhance the Park and avoid detrimental impacts on its amenity, and its ecological and heritage assets.

A number of the overarching aims, objectives and principles set out in the draft SPD are encouraging in this respect and are supported, in particular:

- Principle 7 which states that the design of tall buildings must respond to place and local distinctiveness.
- Principle 8 which seeks a sensitive and effective approach to Borough's heritage assets.
- Principle 9 where the height of development should step down to areas of lower scale so that it is not overbearing on the lower scale context.
- Principle 10 which states that tall buildings should respond sensitively to the Borough's blue and green infrastructure.

All the above principles would apply to tall building proposals within the vicinity of the Regional Park and should be used to inform future proposals within the two relevant opportunity areas for tall buildings included within the SPD, namely the Isle of Dogs and South Poplar and the Lower Lea Valley.

Likewise, Principle 22 is relevant to the Regional Park. It states that developments with tall buildings should incorporate open space and green infrastructure in order to enhance the living environment, increase biodiversity, manage surface water and mitigate urban heat island effects. Principle 26 is also important, particularly for sensitive habitats and wildlife generally either included as part of new development or present within the vicinity. It focuses on the need for tall building design to consider minimising light pollution at night and glare from the sun during the day.

These are all matters that were recently raised by the Authority in its consultee response to an application for the redevelopment of Orchard Wharf an allocated site located within the Leamouth Cluster tall building zone. Whilst not opposed to the redevelopment of this site in principal and its innovative mix of employment, residential and public realm provision, a number of concerns were formally raised about the impact of the development on the adjoining area of the Regional Park – East India Dock Basin. These related to the scale, height and design of the proposal and the impact of tall buildings in relation to the lower and more intimate scale experienced within the Basin and the need for sufficient open space of different typologies to be included within the site.

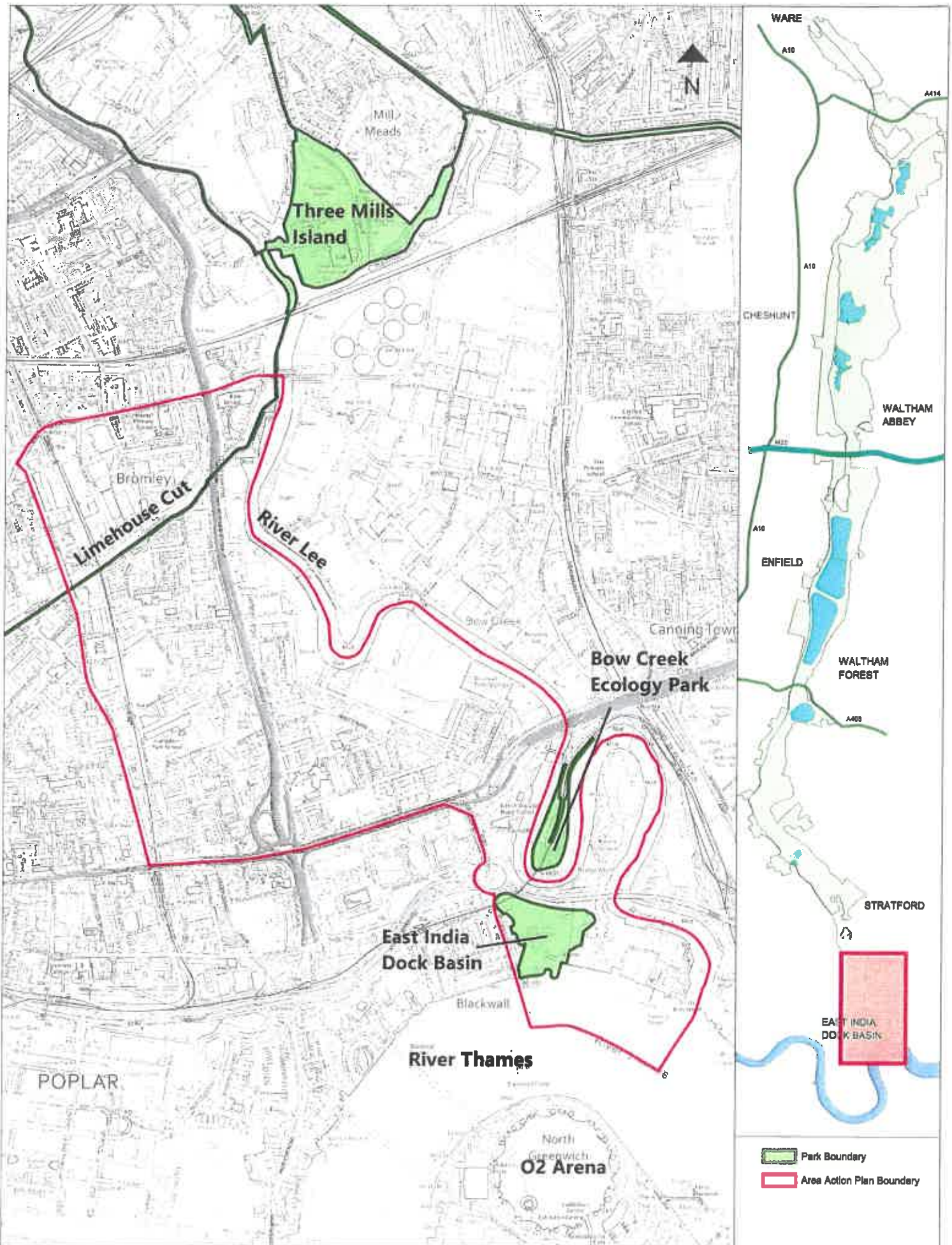
The Authority therefore supports the detailed advice contained within the SPD under section 5 for the Isle of Dogs and South Poplar area which states that future development in the Leamouth cluster should ensure "building heights step down towards the River Thames and East India Dock" (para 5.5.32).

The Authority looks forward to engaging further with Borough officers on the matters raised above as part of the consultation process for the Leaside AAP and the finalisation of the Tall Building SPD.

Yours sincerely

Claire Martin
Head of Planning

This page is blank



London Borough of Tower Hamlets Leaside Area Action Plan (AAP) Context

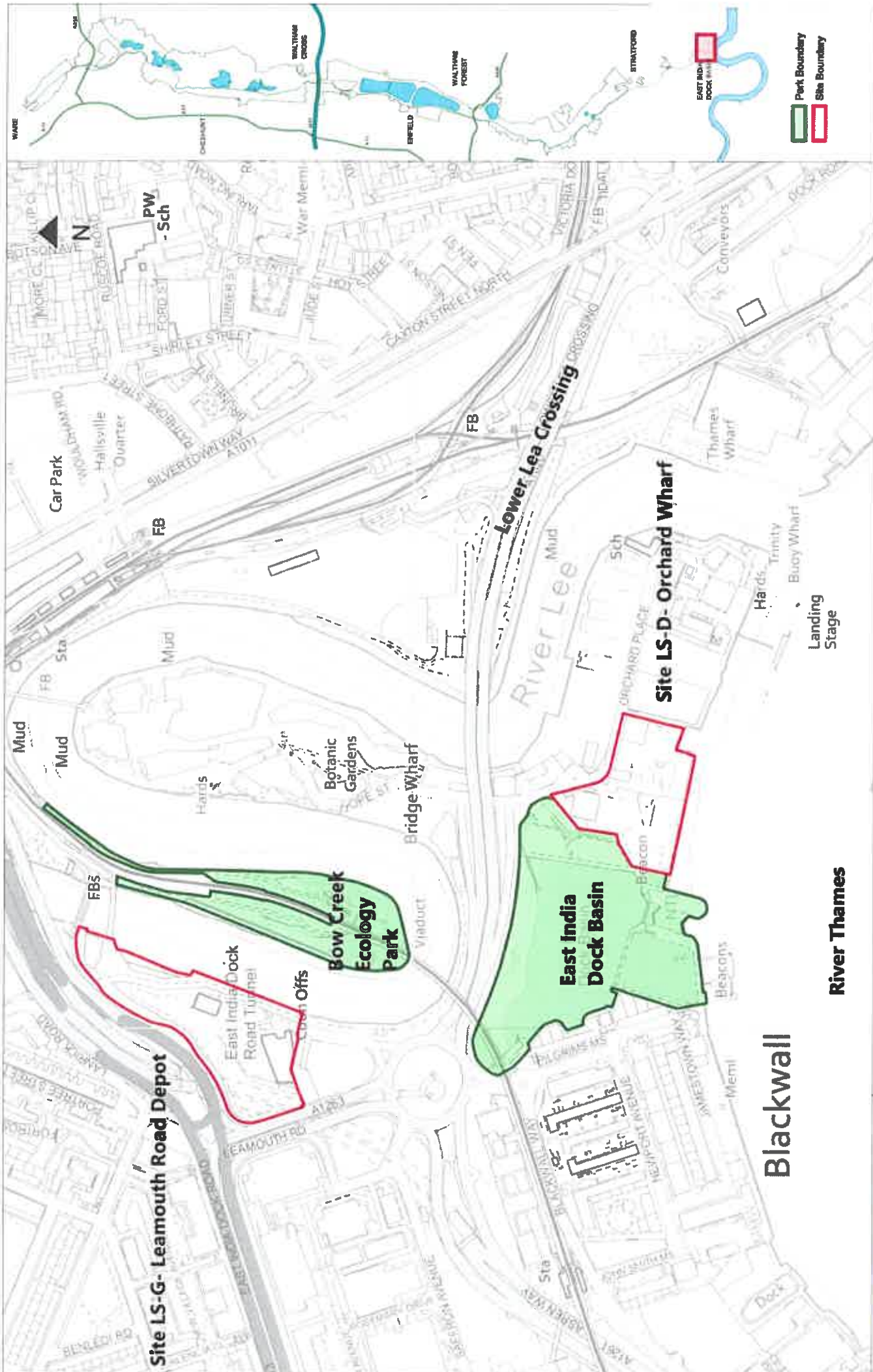
Appendix C Extract from Tall Buildings SPD showing tall building zones

No 5. Leamouth Includes East India Dock Basin and forms part of the Isle of Dogs and South Poplar sub area.

A section of the Limehouse Cut lies within the Lower Lea Valley sub area as indicated below.



Figure 1.4: Local Plan Policy D.DH6 - Tall Building Zones (Figure 7 as referenced in the policy wording)



London Borough of Tower Hamlets Area Action Plan: Site Allocation Areas

1:5000 @ A4
 06.01.22
 Produced by: Corporate GIS (AAB)
 M:\Caddorp Critical Data\User Specific Maps\Crite Maps 2017 - 20\Area Action Plans\Tower Hamlets\Leaside AAP 2022\AAP Allocation Plan (AB) 060122-PT
 © Crown Copyright and Database rights 2022. Ordnance Survey 100019982



This page is blank