



LEE VALLEY REGIONAL PARK AUTHORITY

**REGENERATION AND PLANNING
COMMITTEE**

9 NOVEMBER 2017 AT 11:30AM

Agenda Item No:

6

Report No:

RP/08/17

CONSULTATION BY THE LONDON BOROUGH OF TOWER HAMLETS ON ITS DRAFT (REGULATION 19) LOCAL PLAN

Presented by the Head of Planning and Strategic Partnerships

SUMMARY

London Borough of Tower Hamlets are consulting on their Regulation 19 draft Local Plan which will be presented to the Secretary of State for the Examination in Public next year. The Authority has been consulted on previous drafts and this current draft has largely responded to earlier comments. Where there are comments these are matters of detail. A draft response letter is included in Appendix A to this report.

RECOMMENDATIONS

Members Approve: (1) the draft comments included in Appendix A to this report.

BACKGROUND

- 1 Tower Hamlets has experienced significant growth and development since the adoption of the current Local Plan; the Core Strategy (2010) and the Managing Development Plan Document (2013). A new Local Plan will set out strategic priorities and an up to date planning policy framework to guide and manage development in the borough for the next 10 to 15 years. The plan preparation commenced in 2015 with a 'first steps' consultation to which the Authority responded (LLV/179/16). A second consultation at the end of 2016 was responded through officer comments only. In summary the officer's response letter welcomed many of the draft proposals but sought clarification and further references in several policies.
- 2 Only a small area of the Regional Park lies within Tower Hamlets (please refer to the plan at Appendix B to this report) including East India Dock Basin (a Site of Importance for Nature Conservation (SINC)) and linear routes along the River Lee Navigation, the River Lea, Hertford Union Canal, Limehouse Cut and the Greenway. Two linear route sections are now incorporated into the area of the London Legacy Development Corporation; a short section of the Greenway, and the Lea Navigation towpath between the Hertford Union Canal and Three Mills.

- 3 The adopted Park Development Framework (PDF) Area 1 Proposals which cover the Park within Tower Hamlets were adopted in November 2015. The main focus of these is the delivery of access improvements into the Park, linking with DLR and underground stations, and support for the delivery of the Leaway and Lea River Park project. Proposals for East India Dock Basin identify the need for further feasibility to inform the future development of the site as a visitor hub and gateway to the Regional Park combined with enhancement and promotion of its heritage and biodiversity interests

REGULATION 19 DRAFT PLAN

- 4 The Council's draft plan acknowledges that in the recent decade the Borough has experienced the largest rates of housing growth of any of the London Boroughs and this is set to continue with a growth in population to over 400,000 people by 2031. Set against this is a frank acknowledgement that the Borough has historically had a low amount of publically accessible open space when compared to other inner London Boroughs as well as being far below national standards. This is stated as being 0.89ha per 1000 residents and 1.2ha per 1000 residents respectively. There is also within the introduction references to the chronic levels of health inequalities and the levels of low physical activity which are lower than for other parts of London and the rest of the United Kingdom.
- 5 The section of the draft Plan on 'Setting the Scene' acknowledges that the '*as the Borough becomes more densely populated levels of open space deficiency are expected to increase*'. Given the Governments recently released draft housing growth figures which exceed London plan targets the problems of open space deficiency will be exacerbated. This is a huge challenge for the Borough.
- 6 The current draft of the plan includes references to the Regional Park and a commitment to the Lea River Park and the Leaway. This is designed to improve walking/cycle access from the Queen Elizabeth Olympic Park to the Thames. Within the Borough it includes a new open recreation area at the Leven Road gas works, Bow Creek and East India Dock Basin. These are to be welcomed. In the Authority's response to the previous drafts of this plan its comments were focused on the detail of wording around improving connectivity for biodiversity, legibility and permeability in the specific parts of the draft plan covering the sub areas within the Borough. Whilst these have largely been addressed, it is the overall tone of the Council's approach to green infrastructure which needs to be fully appraised.
- 7 Given the new development context faced by the Borough a set of clearer and stronger policies should be included in the draft plan which set out the benefits of green infrastructure in an area of acute open space deficiency which will be accentuated by the draft plan's proposed growth targets. The draft plan includes references in two of the sub areas, the Lower Lea and the Isle Dogs and South Poplar to detailed proposals in how green infrastructure should be included into specific site development briefs. However draft policies omit important reference to the public health benefits of a new system of green infrastructure for the Borough and how this can improve the area's resilience, support active lifestyles and enhance living space. It is considered that these should be given greater priority to ensure that growth will not actually exacerbate the existing problems of low levels of publicly accessible open space and limited access. Without these the Council is setting out an unsustainable position.

- 8 The Regional Park's origins from Abercrombie's London Plan (1944) through to its inception in 1967 and its programme over the last 50 years has been designed to address the historical legacy of excessive development and the consequences of poverty in the lower Lee valley. The creation of the Park was required to address open space deficiency, low levels of physical activity and poor health. The draft Plan needs to give greater priority to address these matters through a series of detailed briefs to support investment programme to give prominence to its existing open spaces and proposed ones. Without this focus there has to be a question on its 'soundness'.

ENVIRONMENTAL IMPLICATIONS

- 9 There are no environmental implications arising directly from the recommendations in this report.

FINANCIAL IMPLICATIONS

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

HUMAN RESOURCE IMPLICATIONS

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

LEGAL IMPLICATIONS

- 12 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 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.
- 13 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

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

EQUALITY IMPLICATIONS

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

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10th November 2017

Dear Thomas

RE: CONSULTATION ON TOWER HAMLETS DRAFT REGULATION 19 LOCAL PLAN 2031.

Thank you for consulting the Regional Park Authority on the Regulation 19 draft Local Plan 2031 'Managing growth and sharing the benefits'.

This was considered by the Authority's Regeneration and Planning Committee on 9th November 2017 when the following was agreed.

Within Tower Hamlets the Regional Park consists of linear towpaths along the River Lea Navigation, Hertford Union Canal and Limehouse Cut, which connect the Regional Park with the River Thames, and part of the Greenway. Also included in the Park is East India Dock Basin (a site of Importance for Nature Conservation) which forms the southernmost gateway to the Regional Park with important heritage interest, including a number of listed features. Two linear route sections are now incorporated into the area of the LLDC; a short section of the Greenway, and the Lea Navigation towpath between the Hertford Union Canal and Three Mills.

References in the draft Local Plan to the Regional Park, the Park Development Framework and a commitment to the Lea River Park and the Leaway are welcomed.

To date the Authority has responded to the previous consultations with matters of detail. I am aware of the approach generally taken to plan development involving a constant refining down of comments as successive drafts of plans are developed. However, upon consideration of the current draft it is evident that there is a fundamental principle included within the plan which we would wish to challenge. Under the section 'Setting the Scene', there is an explicit admission that, 'As the borough becomes more densely populated, levels of open space deficiency are expected to increase'. The

paragraph continues to explain that 'interventions' will become 'increasingly important, especially within deficient areas.'

Underpinning the whole planning system is one of balance. This is reflected in the National Planning Policy Framework (NPPF 2012) which seeks to balance the potentially impacts of new development through the definition of sustainable development which embraces the three limbs of economy, social and environmental.

I consider that in Tower Hamlets its historic legacy of development represents an imbalance when set against the need for green infrastructure; this is manifest in the levels of open space deficiency. The plan needs to address this in a more fundamental way than as proposed. Whilst key development sites are identified within each of the 4 sub areas with outline proposals a similar level of detail should be given in the draft plan to how open spaces could be developed including the Authority's site at East India Dock Basin and those forming the Lea River Park. This detail should draw out the public health and other green infrastructure benefits of open space and how this can support active lifestyles and create healthier neighbourhoods.

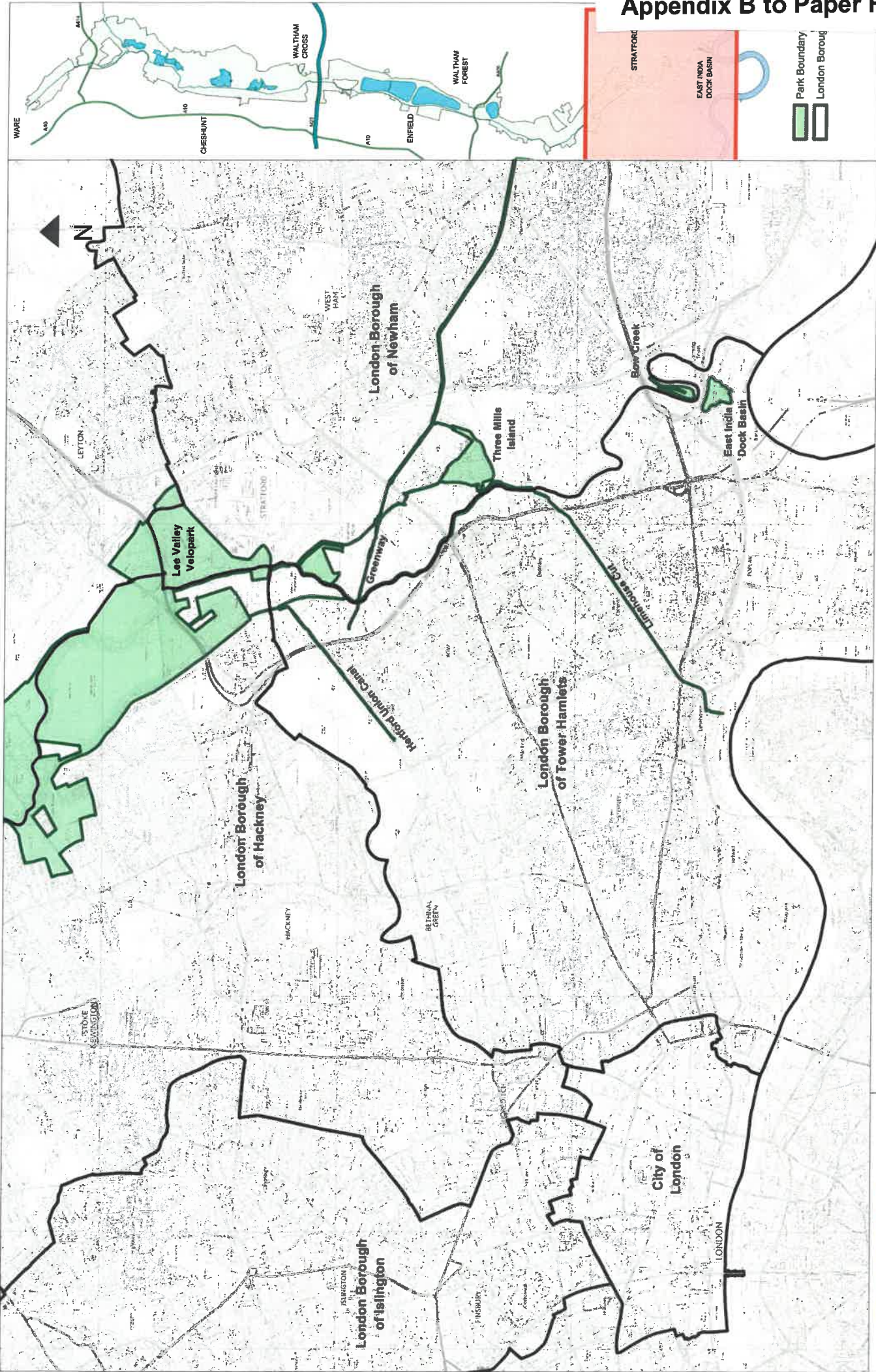
Whilst the parameters of development sites at for example Alisa Street and Leven Road include reference to quantum of open space it is unclear whether this is to serve local need required by the proposed development platform or whether this will serve wider needs.

We would argue that there has to be greater priority given to new investment in open spaces; this could be articulated through more detailed briefs. The statutory purpose of the Regional Park is designed to provide a dedicated place for recreation, leisure, sport and nature reserves. Underpinning this is a belief that the legacy of rampant poorly planned urban development during the nineteenth century which affected the Borough needs to be fully addressed with more specific policies.

Officers from the Authority would be pleased to meet with your team to resolve these matters.

Yours sincerely

Stephen Wilkinson
Head of Planning and Strategic Partnerships



Lee Valley Regional Park Authority within Lond Borough of Tower Hamlets

NTS @ A4
01.11.17

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