

To: David Andrews (Chairman) Simon Miller
 Chris Kennedy (Vice Chairman) Gordon Nicholson
 Peray Ahmet Paul Osborn
 Christine Hamilton Mary Sartin
 Denise Jones Syd Stavrou
 Valerie Metcalfe

A meeting of the **REGENERATION AND PLANNING COMMITTEE** (Quorum – 3)
will be held at Myddelton House on:

9 NOVEMBER 2017 AT 11.30AM

at which the following business will be transacted:

AGENDA

Part I

1 To receive apologies for absence.

2 **DECLARATION OF INTERESTS**

Members are asked to consider whether or not they have disclosable pecuniary, other pecuniary or non-pecuniary interests in any item on this Agenda. Other pecuniary and non-pecuniary interests are a matter of judgement for each Member. (Declarations may also be made during the meeting if necessary.)

3 **MINUTES OF LAST MEETING**

To approve the Minutes of the Meeting held on 21 September 2017 (copy herewith).

4 **PUBLIC SPEAKING**

To receive any representations from members of the public or representative of an organisation on an issue which is on the agenda of the meeting. Subject to the Chairman's discretion a total of 20 minutes will be allowed for public speaking and the presentation of petitions at each meeting.

- 5 GOVERNMENT CONSULTATION - BUILDING THE RIGHT HOMES IN THE RIGHT PLACES Paper RP/07/17

Presented by Head of Planning & Strategic Partnerships

- 6 CONSULTATION BY THE LONDON BOROUGH OF TOWER HAMLETS ON ITS DRAFT (REGULATION 19) LOCAL PLAN Paper RP/08/17

Presented by Head of Planning & Strategic Partnerships

- 7 Such other business as in the opinion of the Chairman of the meeting is of sufficient urgency by reason of special circumstances to warrant consideration.
- 8 Consider passing a resolution based on the principles of Section 100A(4) of the Local Government Act 1972, excluding the public and press from the meeting for the items of business listed on Part II of the Agenda, on the grounds that they involve the likely disclosure of exempt information as defined in those sections of Part I of Schedule 12A of the Act specified beneath each item.

AGENDA
Part II
(Exempt Items)

- 9 Such other business as in the opinion of the Chairman of the meeting is of sufficient urgency by reason of special circumstances to warrant consideration.

1 November 2017

Shaun Dawson
Chief Executive

LEE VALLEY REGIONAL PARK AUTHORITY

REGENERATION & PLANNING COMMITTEE MINUTES 21 SEPTEMBER 2017

Members Present: David Andrews (Chairman) Valerie Metcalfe
Chris Kennedy (Vice Chairman) Gordon Nicholson
John Bevan (Deputy) Paul Osborn
Denise Jones Mary Sartin
Derek Levy (Deputy) Syd Stavrou

Apologies Received From: Peray Ahmet, Christine Hamilton, Simon Miller

In Attendance: Derrick Ashley, John Wyllie

Officers Present: Stephen Wilkinson - Head of Planning & Strategic Partnerships
Beryl Foster - Assistant Director of Legal & Property
Lindsey Johnson - Committee Services Officer

Part I

01 DECLARATIONS OF INTEREST

Name	Agenda Item No.	Nature of Interest	Prejudicial ✓
John Bevan	8	Member of London Borough of Haringey	Non-Pecuniary
Gordon Nicholson	9-10	Member of Broxbourne Borough Council	Non-Pecuniary
Mary Sartin	10	Member of Epping Forest District Council on the Area Planning Sub Committee	Non-Pecuniary
Syd Stavrou	10	Member of Epping Forest District Council on the Area Planning Sub Committee	Non-Pecuniary

02 MINUTES OF FORMER PLANNING COMMITTEES

THAT the Minutes of the Upper Lee Valley Regeneration & Planning Committee meeting held on 22 June 2017 and the Lower Lee Valley Regeneration & Planning Committee meeting held on 26 June 2017 be approved and signed.

03 PUBLIC SPEAKING

No requests from the public to speak or present petitions had been received for this meeting.

REGENERATION & PLANNING COMMITTEE MINUTES 21 SEPTEMBER 2017

04 **PARK DEVELOPMENT FRAMEWORK - UPDATE** Paper RP/06/17

The Head of Planning & Strategic Partnerships introduced the report.

The Chairman asked if we were currently keeping a record of the Park's landscapes and their changes over time in regard to urban pressures. The Head of Planning & Strategic Partnerships responded, stating that aerial photographs were taken in 2016 and urban pressures were only picked up in planning applications reported to committees. Members agreed that keeping an image library of vistas that were important to the Park was a good idea and agreed for officers to come back to Members with a report to the Executive Committee on how this might be achieved.

- (1) the report was noted; and**
- (2) officers to bring a report to the Executive Committee regarding the creation of a library of images of important landscapes in the Park was approved.**

John Wyllie arrived during the next item.

05 **CONSULTATION BY THE MAYOR OF LONDON ON THE** Paper RP/01/17
DRAFT LONDON ENVIRONMENTAL STRATEGY

The Head of Planning & Strategic Partnerships introduced the report detailing his proposed changes to the draft letter included at Appendix A to Paper RP/01/17 which included:

- Page 11, paragraph 2: Include the word 'insensitive' before development;
- Page 11, paragraph 6: the paragraph be amended to 'The principles of a 'National Park City' where everyone has the opportunity to experience, enjoy and benefit from the natural environment broadly complements the Regional Park's remit and should account for the Authority's statutory remit for sport, recreation and nature reserves. However account needs to be taken of the Authority's funding and provision of major venues which serve both the elite athletes and local communities'.
- Page 12, after the bullet points the following sentence be added: 'The Authority would be keen to be part of any pilot required to 'test' the approach to the development of Ecosystem services'.
- Page 13, last paragraph: Amended to say, 'The Authority welcomes opportunities to be involved in the strategy as it develops'.

A Member raised concern that not all open space is green space eg: car parks and that not all green space is of recreational value and stated that it was important that our response to the Draft Environmental Strategy protected only land that was of value and acknowledge areas that are of marginal value.

A Member asked that East India Dock Basin be added to Page 10, paragraph 2.

- (1) the draft letter included at Appendix A to Paper RP/01/17 as the Authority's formal comments on the Mayor's draft London Environment Strategy was approved with the following amendments:**
 - (a) page 11, paragraph 2: Include the word 'insensitive' before development;**

REGENERATION & PLANNING COMMITTEE MINUTES 21 SEPTEMBER 2017

- (b) page 11, paragraph 6: the paragraph be amended to 'The principles of a 'National Park City' where everyone has the opportunity to experience, enjoy and benefit from the natural environment broadly complements the Regional Park's remit and should account for the Authority's statutory remit for sport, recreation and nature reserves. However account needs to be taken of the Authority's funding and provision of major venues which serve both the elite athletes and local communities';
- (c) page 12, after the bullet points: The following sentence be added, 'The Authority would be keen to be part of any pilot required to 'test' the approach to the development of Ecosystem services';
- (d) page 13, last paragraph: Amended to say 'The Authority welcomes opportunities to be involved in the strategy as it develops'; and
- (e) page 10, paragraph 2: East India Dock Basin be added.

06 CONSULTATION ON THE LONDON MAYOR'S DRAFT TRANSPORT STRATEGY Paper RP/02/17

The Head of Planning & Strategic Partnerships introduced the report.

A Member expressed concern that an emailed response may be missed and suggested that a letter be sent instead. The Head of Planning & Strategic Partnerships responded stating that the Draft Transport Strategy had requested that responses be sent via email, but he could send a letter as well.

A Member stated that the rail way line acted as a barrier to getting into the north of the Park and suggested that Crossrail may provide opportunities to improve this access.

The Chairman asked that Members be sent a briefing note on any meetings if appropriate.

- (1) the draft comments included in the draft email at Appendix A to Paper RP/02/17 to be sent both by email and letter was approved.

07 PLANNING CONSULTATION BY THE LONDON BOROUGH OF HARINGEY ON AN APPLICATION FOR A MIXED USE DEVELOPMENT OF BETWEEN 11-33 STOREYS COMPRISING 1588SM OF COMMERCIAL SPACE, 279 RESIDENTIAL UNITS AND RELATED INFRASTRUCTURE, HALE VILLAGE, N17 Paper RP/03/17

The Head of Planning & Strategic Partnerships introduced the report explaining that because this planning application is outside of the Park it is difficult to object to, but we can try to apply for CIL contributions.

Members agreed that the Canal & River Trust should also be asking for CIL contributions from this development and that it was important that the Authority works closely with them in improving the tow paths and navigation.

REGENERATION & PLANNING COMMITTEE MINUTES 21 SEPTEMBER 2017

The Chairman asked the Head of Planning & Strategic Partnerships to do anything he could to strengthen the Authority's position and likelihood of receiving CIL contributions for this development.

- (1) that in the event of planning permission being granted the Council consider the use of Community Infrastructure Levy derived from this scheme for enhancements to the Regional Park in the vicinity of this site was approved.

08 PLANNING CONSULTATION BY THE BOROUGH OF BROXBOURNE Paper RP/04/17
ON AN APPLICATION FOR CHANGE OF USE FROM GENERAL
INDUSTRIAL TO STORAGE, RYE HOUSE STATION GOODS YARD

The Head of Planning & Strategic Partnerships introduced the report.

The Chairman endorsed the concerns over floodlighting on this site.

- (1) the Authority objects to the application given the absence of landscaping on the eastern boundary of the site within the Regional Park and details of the proposed lighting given the location of the site opposite the Rye Meads Site of Special Scientific Interest and nature reserve in the wildlife foraging corridor for bats was approved.

09 PLANNING CONSULTATION BY EPPING FOREST DISTRICT Paper RP/05/17
COUNCIL ON AN OUTLINE APPLICATION FOR NINE
RESIDENTIAL DWELLINGS AT BROXLEA NURSERY, NURSERY
ROAD, LOWER NAZEING

The Head of Planning & Strategic Partnerships introduced the report.

- (1) the Authority objects to the proposed development as it is contrary to the policies designed to protect the permanence and openness of the Green Belt included in the National Planning Policy Framework and the adopted policies of the Park Plan designed to integrate the site into the landscape of surrounding parkland was approved.

Chairman

Date

The meeting started at 11.30am and ended at 12.30pm.



LEE VALLEY REGIONAL PARK AUTHORITY

**REGENERATION AND PLANNING
COMMITTEE**

9 NOVEMBER 2017 AT 11:30AM

Agenda Item No:

5

Report No:

RP/07/17

GOVERNMENT CONSULTATION - BUILDING THE RIGHT HOMES IN THE RIGHT PLACES

Presented by the Head of Planning and Strategic Partnerships

SUMMARY

Members are asked to note the implications of this report which outlines the Governments' recently published draft Objective Assessment of Housing Need. As a national consultation it affects every local authority in the country. The draft assessment identifies that the pattern of housing growth experienced during the last decade in the riparian boroughs and districts will continue. This report is not seeking to critique the approach advocated but just to report the anticipated impacts on the Regional Park. This poses challenges and opportunities for the Regional Park in equal measure.

RECOMMENDATIONS

Members Note: (1) the contents of the report.

BACKGROUND

- 1 The identification of an appropriate formula to correctly identify the extent of housing growth is a vexed issue. During the last decade this issue has increasingly dominated local plan inquiries as local planning authorities and consultants debate the merits of various methodologies. Safeguarding a five year supply of housing sites required to meet demand has become a critical issue in the determination of planning applications and appeals.
- 2 In its White Paper, 'Fixing our Broken Housing Market' (2017), the Government committed to producing a consultation on the assessment of housing need which would be 'standard', designed to provide a consistent and transparent method which would be both realistic about current and future housing pressures. This method was published in September in a draft paper, 'Planning for the right homes in the right places'.

PLANNING FOR THE RIGHT HOMES IN THE RIGHT PLACES

- 3 The new approach included in the draft white paper seeks to be simple, based on publicly available data from the Office of National Statistics, (ONS) and realistic based on the actual need for homes in districts. The consultation paper makes it clear that the figures resulting from the proposed methodology are a minimum and authorities can plan for more if for example they are in an area of new employment growth or planned infrastructure. The proposed methodology includes a baseline established from ONS data. This is derived from the annual average household growth over the previous decade and projected forwarded during the proposed 'plan period'.
- 4 The growth figures are adjusted to account for 'market signals', using the median affordability ratios which would be based on a workplace based median house price to median earnings ratio from the most recent year that data is available. The inclusion of these figures into a basic formula identifies results in a figure for projected housing growth. Although the use of formula implies a rational approach it is complicated by the government intending to cap the level of increase in housing numbers with reference to the current status of the local plan. For authorities with a local plan adopted within the last 5 years the cap will be limited to no more than 40% increase above the annual requirements as set out in the adopted local plan. For authorities with a local plan adopted more than 5 years ago the cap will be at 40% above whichever is higher of the ONS projected increase or the annual housing requirement figure set out in the current local plan. Some comment is made within the consultation to the proportion of land within each local authority which is constrained by Green Belt or similar designation.
- 5 The consultation paper is seeking to make changes to the National Planning Policy Framework (NPPF 2012) in several areas. These include the need for a 5 year review of local plans and that once adopted the housing projections should be considered reliable for a period of two years post adoption. The consultation also proposes the inclusion in the NPPF additional provisions to strengthen the existing 'duty to co-operate' through 'Statements of Common Ground' which would set out the strategic cross boundary planning issues. It is proposed that these statements are in place within 12 months of the adoption of the revised NPPF. Other provisions suggested relate to viability in relation to the intended thresholds which local planning authorities intend for affordable housing and related to this a mix of housing needs.
- 6 The Government intends to ensure that by 2020 all land in areas of greatest housing need should be registered by HM Land Registry and has as part of the consultation published a register of local authorities where this is required, London Borough of Haringey is included.

CONCLUSIONS

- 7 Whilst the draft proposals are to be welcomed in attempting to focus on this important matter the proposed approach only serves to highlight the major challenges it faces. Over the last three years London's proposed housing completions per annum have risen from 42,000 in 2014 although at the time the ONS anticipated 49,000 new homes would be required and under the proposed methodology it is likely to be around 72,400 although the Greater London Authority (GLA) has recently published forecasts that only an additional 66,000 homes are required per annum, of which 65% should be affordable.

- 8 The methodology involving an extrapolation of past trends with assumptions on affordability has inevitably resulted in considerable growth being anticipated for each of the riparian boroughs and districts. These are highlighted in Appendix A to this report. Appendix B to this report includes details of the proposed growth figures from the GLA for the riparian London boroughs. The differences in the two sets of figures highlights the challenges involved in this whole debate.
- 9 The impact of such continuing high rates of housing development point to the continued importance of the Regional Park as a resource for nature conservation, recreation and leisure where land is at a premium for these uses. It also highlights the opportunities enabled by the Authority's adopted Corporate Land and Property strategy; this is particularly important in the context of the proposed CrossRail 2 scheme where the riparian authorities may be considering opportunities for additional growth given the opportunities this scheme poses.

ENVIRONMENTAL IMPLICATIONS

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

FINANCIAL IMPLICATIONS

- 11 There are no financial 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.

Author: Stephen Wilkinson, 01992 709828, swilkinson@leevalleypark.org.uk

BACKGROUND REPORTS

Planning for the homes in the right places

September 2017

APPENDICES ATTACHED

Appendix A	Schedule of riparian authorities with projected housing growth figures
Appendix B	GLA Housing Projections

LIST OF ABBREVIATIONS

ONS	Office of National Statistics
NPPF	National Planning Policy Framework
GLA	Greater London Authority

Appendix A to Paper RP/07/17

Government Housing Projections

Local Authority	Indicative assessment of housing need based on proposed formula, 2016 to 2026 (dwellings per annum)	Current local assessment of housing need, based on most recent publicly available document (dwellings per annum)	Proportion of Local Authority land area covered by Green Belt, National Parks, Areas of Outstanding Natural Beauty or Sites of Special Scientific Interest	Most recent adopted Local Plan number ¹ (dwellings per annum)
Broxbourne	559	454	64%	No adopted plan number
East Hertfordshire	1,111	745	37%	No adopted plan number
Enfield	3,330	1695 - 2400	38%	733
Epping Forest	923	514	94%	No adopted plan number
Hackney	3,251	1,758	0%	1,160
Haringey	1,148	1,357	2%	820
Newham	3,840	2,355	2%	2,500
Tower Hamlets	4,873	2,428	0%	2,885
Waltham Forest	2,416	2,017	23%	760

Appendix B to Paper RP/07/17

GLA Housing Projections

Borough	Total 10 Year Capacity	Annualised
Enfield	18760	1876
Hackney	13300	1330
Haringey	19580	1958
Newham	38500	3850
Tower Hamlets	35110	3511
Waltham Forest	17940	1794



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.

Thomas Clarke
Planning Policy Consultation
D&R Strategic Planning
London Borough of Tower Hamlets
PO BOX 55739
London, E14 1BY

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

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.

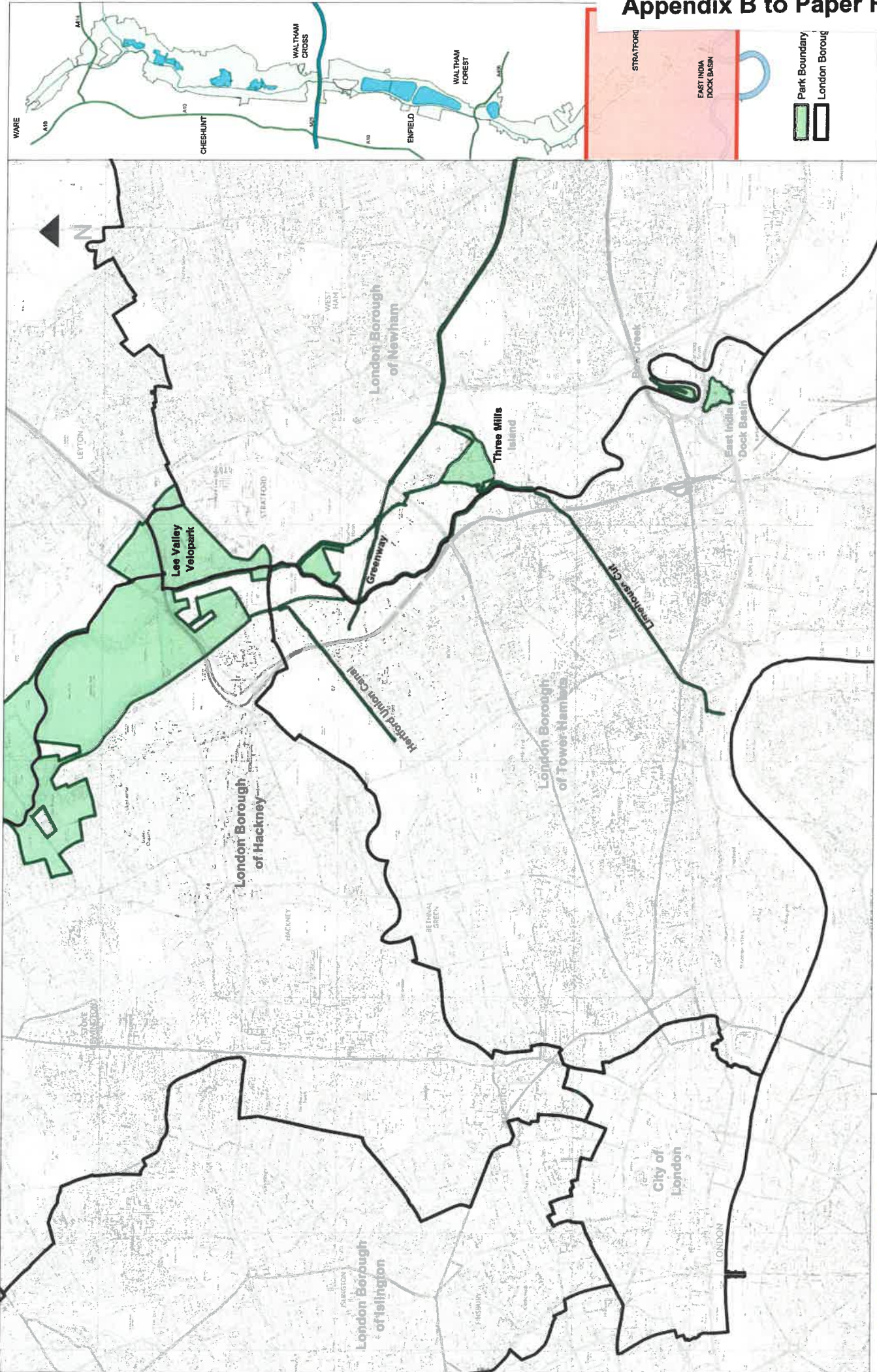
Whilst the parameters of development sites at for example Alisa Street and Leven Road include reference to quantum of open space it is unclear whether this is to serve local need required by the proposed development platform or whether this will serve wider needs.

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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Legend:

- STRATFORD
- EAST INDIA DOCK BASIN
- Park Boundary
- London Borough

