

**LONDON BOROUGH OF TOWER HAMLETS DRAFT NEW  
LOCAL PLAN REGULATION 18 CONSULTATION**

Presented by the Head of Planning.

**SUMMARY**

The London Borough of Tower Hamlets are consulting on a draft new Local Plan that will guide development in the borough until 2038. The current Local Plan was adopted in January 2020 but the Council consider that a number of the objectives, policies and guidance contained within this plan could now be outdated as national and regional guidance is progressively updated.

In general the draft new local Plan is to be welcomed and supported. It provides detailed policies with comprehensive supporting text to justify the strategies and policy positions. The Authority's comments are set out in the letter attached at Appendix A. These are focused on the draft policies most relevant to the Regional Park within Tower Hamlets in particular those relating to development and tall buildings, open space and biodiversity, heritage and movement. Consideration is given to the development principles set out for three site allocations located outside but close to the Park boundary. Officers will continue to liaise with the Borough as the draft Local Plan progresses to the next stage.

**RECOMMENDATION**

Members Approve:                   (1)   the comments as set out in Appendix A to this report as the Authority's formal response to the consultation by the London Borough of Tower Hamlets on the draft Local Plan Regulation 18 document.

**BACKGROUND**

1   The London Borough of Tower Hamlets (LBTH) is consulting on the first draft of their new Local Plan, Regulation 18 version. A series of new policies have been developed to help shape the future of Tower Hamlets' places over the next 15 years. A range of evidence base documents have been completed or are under production to inform the Local Plan process and an Integrated Impact Assessment accompanies the Plan. Following consideration of the responses to this consultation LBTH are proposing to produce a Regulation 19 consultation version of the Local Plan during summer 2024 and then submit the Plan for

Examination late 2024 early 2025. Adoption is programmed for Winter 2025.

- 2 The Council's current Local Plan "Managing growth and sharing the benefits", was adopted in 2020. It provides the planning policy framework for the borough up to 2031. However, LBTH consider that specific objectives, policies and guidance contained in, and informing the Plan, may now be outdated, particularly due to changes in national and regional guidance, in particular the London Plan (2021), and the new Levelling Up & Regeneration Bill. The new Local Plan will also need to plan for parts of the borough where the planning powers are currently held by the London Legacy Development Corporation (LLDC) planning authority. This includes the areas of Fish Island, Hackney Wick and Bromley by Bow and two linear route sections within the Park; a short section of the Greenway, and the Lea Navigation towpath between the Hertford Union Canal and Three Mills. The planning powers of this area will be handed back to the Borough by December 2024 as agreed by the Mayor of London.
- 3 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 also 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.
- 4 Park Development Framework (PDF) Area 1 Proposals cover the Park within Tower Hamlets. The main focus of these is the delivery of access improvements into the Park, linking with DLR and underground stations, such as Star Lane, Canning Town, East India and from Bromley by Bow, and support for the delivery of the Leaway and Lea River Park project. Proposals for East India Dock Basin (EIDB) 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. These proposals and associated feasibility work are being taken forward as part of the EIDB project. This includes work currently in hand to obtain relevant permissions to desilt the Basin, project design for improved visitor infrastructure and the restoration of the lock gates.
- 5 Proposals aim to minimise the impact of new development on the Park's linear routes and open spaces and seek to achieve a balance in protecting their ecological value and potential as well as promoting the recreational and leisure opportunities they provide for the wider benefit of local people and visitors to the Park.

## **DRAFT LOCAL PLAN OVERVIEW – KEY AREAS RELEVANT TO REGIONAL PARK**

### **6 Vision and Objectives**

The Council's Vision for Tower Hamlets is based on empowering the next generation – building a brighter future and promoting a multicultural and diverse community that thrives within mixed, cohesive and inclusive neighbourhoods. The Vision and associated objectives are focused on addressing overcrowding in the borough and the associated health and education issues through an increased in housing of all types and tenures and an expansion of the Tall Building Zone (TBZ). Securing infrastructure delivery to protect and strengthen public services is a key objective to deliver essential physical, digital, community and green infrastructure.

- 7 The Vision supports walking and cycling links alongside improvements to the public transport network. It identifies the borough's network of green and blue spaces as providing opportunities for leisure, relaxation and entertainment with a variety of uses supported where these provide for health and well-being whilst still ensuring their enjoyment and function as open space is retained. The Council aims to celebrate the vibrant history and urban landscape of Tower Hamlets through thoughtful design and placemaking, highlighting the rich, historic and significant character areas.

**8 Policies**

The draft Local Plan policies are set out under 10 themes, consisting of both strategic policies (the first part of each policy) and development management policies. Site allocations provide further detail for specific sites grouped under four sub areas identifying indicative capacities for new homes and jobs alongside necessary infrastructure, such as open space, community, health and education facilities. An overview of the main policies of relevance to the Regional Park are set out in the following paragraphs.

**9 Delivering the Local Plan**

To meet the Borough's pressing needs the Council aims to promote and deliver growth within the borough's site allocations, in highly accessible locations and within the three opportunity areas (City Fringe, Poplar Riverside and the Isle of Dogs and South Poplar). The policy supports both the provision of affordable workspace across the borough and intensified industrial development within the borough's Strategic and Local Industrial Locations (SIL and LIL respectively). All developments will be required to deliver significant new infrastructure including improvements to the transport network, green grid projects, community infrastructure, and outdoor sports pitches, new parks and public open spaces, (Policy DV1 'Areas of Growth and opportunity within Tower Hamlets').

- 10 The Council is also seeking to secure the delivery of at least 52,095 new homes across the borough from 2023-2038, (Policy HF1 'Meeting Housing Needs'). Policy sets a strategic target of achieving 50% affordable homes through a range of providers, as well as council-led initiatives, (HF2 'Affordable Housing and Housing Mix'). Development proposals for 10 or more residential units, will be expected to provide at least 40% affordable housing. The significant amount of tall buildings (defined as 30m or more in height above ground level measured to uppermost part of the structure) being planned and constructed in the borough are important contributors in meeting these targets. Consequently the draft Local Plan takes a new approach to tall buildings. Policies will consider greater height in a wider range of locations across the borough with the additional density provided by these developments balanced out by a correspondingly greater level of affordable housing delivery. For tall buildings to be considered acceptable in the overall planning balance they will be expected to meet or exceed the 40% affordable housing target.

**11 Community Infrastructure, Open Space and Biodiversity**

Draft Local Plan policies offer support for a range of community infrastructure including health, social, education, leisure, cultural, and sport facilities. These are seen as providing valuable services to both local communities and visitors. Parks and open spaces are also identified as key elements of community infrastructure and are considered a vital part of the borough, improving the health and well-being of communities by enabling social interaction, and facilitating active lifestyles and recreation.

- 12 The Council recognise the increasing need for policy to protect and revitalise the Borough's existing open spaces as well as secure additional publicly accessible open space, especially within deficient areas. Strategic development proposals will be required to provide an increase in new open space on-site in proportion to the scale of development proposed, (Policy BO1 c)). Likewise the borough's valuable water spaces require protection, (BO3 'Water Spaces') for example from infilling and over sailing and policy is aimed at improving continuous public access, enhancing biodiversity, promoting water-related and water-dependent recreation, and ensuring the delivery of high-quality design to celebrate the heritage of our waterways.
- 13 Policy BO4 'Biodiversity and access to nature' aims to ensure development protects and retains existing habitats and features of biodiversity value replacing these features within the development if this is not possible. The policy requires development to demonstrate that they will not have a negative impact on open or water spaces (BO4 1c)). The policy also covers the requirements of Biodiversity Net Gain (BNG) and the need for major development to submit an ecology assessment. The importance of protecting designated European Sites outside the borough is highlighted as is the need for development to avoid harm to biodiversity with particular reference to Sites of Importance for Nature Conservation (SINCs), protected and priority species. The Urban Greening policy BO5 aims to ensure development maximises opportunities for urban greening and applies to all developments of all sizes.
- 14 **Movement and Connectivity**  
 Policy MC1 Sustainable Travel seeks to ensure development supports walking and cycling as a primary means of travelling, in line with the 15minute city principles and incorporates a pedestrian and cycling environment that is safe accessible and permeable linking into the borough's networks such as the Green Grid, Thames Path and strategic cycling networks. A number of planned interventions that are required to support the borough's transport network are included in the justification text, for example new pedestrian and cycle networks and improvements to DLR network and station capacity.

## **COMMENTS ON THE DRAFT LOCAL PLAN POLICIES RELEVANT TO THE REGIONAL PARK**

- 15 **Vision and Objectives**  
 The Regional Park within Tower Hamlets forms an important part of the Boroughs blue and green infrastructure resource, contributing to its open space and heritage assets. The Vision for Tower Hamlets is to be supported. It recognises the importance of natural assets and the borough's historic character and the opportunities provided by this network of green and blue spaces for leisure, recreation and entertainment and the contribution they make to health and well-being and the delivery of high quality neighbourhoods. A strong policy framework will be needed to protect existing natural and heritage assets and increase future open space provision given the need for increased housing to address overcrowding in the borough.
- 16 **Delivering Growth and Tall Buildings Policy**  
 The Local Plan identifies the locations and opportunity areas within the Borough considered suitable for the promotion and delivery of growth. East India Dock Basin falls within the Isle of Dogs and South Poplar Sub-area and the linear extensions to the Regional Park are included within the Leaside Sub-area. Site

Allocations such as Bromley-by-Bow which are located outside the Park but adjacent to its boundary are identified as suitable locations where growth (primarily housing delivery) and investment will be targeted.

- 17 Over recent years the Authority has responded to a number of planning consultations for development of considerable scale and density on sites adjoining the Park boundary and accepted the principle of promoting growth in these areas to meet a range of housing needs. However there are often concerns expressed about the inadequacies of the layout and design of major new development and how it relates to and impacts upon the open and water spaces within the adjoining Park areas. It is therefore welcome that Policy DV1 'Areas of Growth and opportunity within Tower Hamlets' requires all developments to deliver infrastructure and facilities to meet the demand from the significant levels of development proposed, including green grid projects such as Lea River Park, new parks and public open spaces. This would assist to some extent in alleviating the pressure on sites such as EIDB which has a limited capacity in terms of footfall and leisure use particularly given the sensitivities associated with its designation as a SINC.
- 18 Part of the Tall Building Policy PS2 Part 4b) is also to be supported where this states that important locations such as nature sites and conservation areas are to be protected from potential negative impacts of taller buildings; it requires proposed height to take account of "the need to avoid harm to the significance of heritage assets, areas of ecological importance, or the enjoyment of the borough's open spaces". Policy PS2 Part 5 includes design criteria which set out the circumstances in which tall buildings would be considered acceptable from a design perspective, including that they "be of a height, scale, mass, volume and orientation that are proportionate to their role, function and the importance of the location in the local, borough-wide and London context; and take account of the character of the immediate context and of their surroundings;" please refer to Appendix C to this report for the full set of criteria.
- 19 A set of Tall Building Zones A to E are included in the draft plan – these are considered to be the locations most appropriate for the tallest buildings and many already contain clusters of tall buildings or coincide with site allocations. Tall Building Zone Principles (Table 3) have been produced for each zone, of interest to the Park is Zone E (Leamouth) where it states that "Tall buildings in this zone should step down towards the River Thames and the East India Dock Basin and ensure glimpses and views across the zone. Height of new development should not exceed 90m Above Ordnance Datum (AOD)".
- 20 **Open Space and Biodiversity**  
Policy BO1 Green and Blue Infrastructure seeks to maintain and enhance the provision of green infrastructure across the borough. It refers specifically (Part 1g) to the delivery of "enhanced new strategic publicly accessible open spaces at Lea River Park (including Leaway) and within site allocations". This policy will assist with the delivery of PDF Proposals under 1.A.2 which provide support for the development of the Leaway and the Lea River Park Project. This policy also seeks to maintain the open character of Metropolitan Open Land (MOL) requiring Very Special Circumstances to be demonstrated for development proposals on MOL. This would be a consideration in any future proposal for EIDB for example the provision of a café or similar visitor facilities, alongside a range of ecological and heritage considerations.
- 21 The detail of Policy BO2 'Open Spaces and the Green Grid Network' is helpful

and can be endorsed. It is clear that new development should contribute to the delivery of new or enhanced publicly accessible open space on site and sets out the criteria for the quality and scope of this provision. Part 4 of the policy establishes that development will be expected to demonstrate how it will enhance and not negatively affect the borough's accessible open space. Reference to the Regional Park and support for the PDF proposals is set out within supporting text to this policy at para 19.50. It states:

"The LVRP forms an important part of the borough's green grid and water spaces network and has the potential to contribute to creating healthy and liveable communities, particularly where links into this network can be enhanced and complemented with new open space delivered as part of development." We will work together with the Lea Valley Regional Park Authority and the Environment Agency to support proposals set out in the Tower Hamlets' Local Biodiversity Action Plan, the Park Plan and Park Development Framework where they relate to the borough."

The reference and support for the Regional Park as provided is to be welcomed. There is no mention of the Lee Valley Regional Park Act 1966 (the Park Act) and its provisions within the draft Local Plan and some amendments are therefore suggested in the letter attached at Appendix A to this report.

- 22 The detail provided under Policy BO3 'Water spaces' is to be welcomed. In particular the supporting text highlights the sense of openness that can be provided by water spaces and the importance of this to a person's perception and enjoyment of water spaces. Policy seeks to prevent the loss or covering of water space through development and harm to the openness of water space. Of particular relevance to the Regional Park within Tower Hamlets is the policy requirement that development must provide suitable setbacks from water space edges to allow for maintenance and flood mitigation and to allow for riverside walks, towpaths and cycle paths where appropriate. These requirements can be supported.
- 23 **Biodiversity**  
The draft Local Plan contains a comprehensive policy BO4 for the protection and enhancement of biodiversity and access to nature, which is to be supported. It also covers the requirements of BNG and recognises that development sites within the borough will have a very low level of baseline biodiversity against which to make future Biodiversity Net Gain (BNG) calculations. To ensure this avoids a low increase in biodiversity the policy expects development to achieve a minimum 2.5 biodiversity units per hectare increase or 30% gain (whichever is the higher) in habitat value for wildlife compared with pre-development baseline. Where this cannot be achieved on site BNG requirements will need to be offset via purchase of Biodiversity units secured via section 106 planning obligation or planning condition.
- 24 **Heritage**  
The draft Local Plan recognises the variety and diversity of heritage assets within the borough and part 1 of Policy PS6 'Heritage and Historic Environment' aims to conserve or where appropriate enhance these assets in a manner appropriate to their significance. Policy sets out how the historic environment should inform development, and the criteria against which planning applications will be assessed. It is noted that development will need to demonstrate an understanding of the significance of the relevant asset, including the contribution setting makes to its significance, submitting a statement of significance,

including a heritage impact assessment, as part of the planning application process.

**25 Movement and Connectivity**

Policy MC1 provides a clear steer for development to ensure it supports walking and cycling as a primary means of travelling and that it connects in to the surrounding pedestrian and cycling networks. This is an important policy to help ensure the Park areas are not cut off from adjoining communities given its location on the edge of the borough and adjacent to the River Lee. There are a wide range of planned interventions identified in the justification text, some of which are supported by the Lower Lea Valley Connection and Movement Study. A number of these will benefit visitors to the Park, such as the proposal to remodel the Leamouth Junction to the north west of EIDB for safe cycle and pedestrian movement, including provision of high quality cycling provision on the roundabout and on Leamouth road.

- 26 MC2 'Active Travel and Healthy Streets' includes the requirement that development proposals safeguard and contribute to maintaining and enhancing the boroughs network of walking routes and cycle ways particularly the Thames Path and Green Grid Network. Both of these are relevant to the Park and the connectivity of sites from EIDB adjacent to the Thames Path through to Three Mills and Queen Elizabeth Olympic Park (QEOP) in the north.

**27 Site Allocations**

The site allocations included in the Local Plan have been selected following an assessment of their suitability for development, their deliverability and that they can deliver a strategic amount of housing – generally assumed to be at least 500 homes alongside necessary infrastructure, such as open space, community, health and education facilities. The site allocations are grouped under four sub areas. Of these the Leaside sub area is the most relevant to the Park being situated on the eastern side of the borough. All the site allocations within this area are located outside the Park boundary.

- 28 Development within the following site allocations below located adjacent to the River Lee could offer potential to improve pedestrian and cycle connections into the Park and between sites and adjoining communities both existing and proposed:

- 3.4 Bromley-by-Bow (indicative site capacity 1,300 homes),
- 3.2 Leven Road (indicative site capacity 2,800); and
- 3.5 Blackwall Trading Estate and Leamouth Road Depot (indicative site capacity 700 homes, phasing 2035- 39).

The provision of open waterside space within these areas could also complement the Regional Park spaces which lie on the opposite side of the same waterway as well as enhancing the biodiversity of the waterway corridor.

**ENVIRONMENTAL IMPLICATIONS**

- 29 There are no environmental implications arising directly from the recommendations in this report but the draft Local Plan for Tower Hamlets once adopted will contain policies and allocations that guide and control 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**

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

## **HUMAN RESOURCE IMPLICATIONS**

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

## **LEGAL IMPLICATIONS**

- 32 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.
- 33 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**

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

## **EQUALITY IMPLICATIONS**

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

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## **BACKGROUND REPORTS**

Consultation on the London Borough Tower Hamlets November 2023  
draft Local Plan Regulation 18 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 Borough of Tower Hamlets        |
| Appendix C | Extract from draft Local Plan – part of the Tall Building Policy PS2  |

## **LIST OF ABBREVIATIONS**

- |      |                                 |
|------|---------------------------------|
| LBTH | London Borough of Tower Hamlets |
| PDF  | Park Development Framework      |



<b>SMEs</b>	<b>Small to Medium Sized Enterprises</b>
<b>SINC</b>	<b>Site of Importance for Nature Conservation</b>
<b>EIDB</b>	<b>East India Dock Basin</b>
<b>QEOP</b>	<b>Queen Elizabeth Olympic Park</b>
<b>DLR</b>	<b>Docklands Light Railway</b>
<b>TBZ</b>	<b>Tall Buildings Zone</b>
<b>SIL</b>	<b>Strategic Industrial Locations</b>
<b>LIL</b>	<b>Local Industrial Locations</b>
<b>BNG</b>	<b>Biodiversity Net Gain</b>
<b>AOD</b>	<b>Above Ordnance Datum</b>
<b>MOL</b>	<b>Metropolitan Open Land</b>
<b>LLDC</b>	<b>London Legacy Development Corporation</b>
<b>the Park Act</b>	<b>Lee Valley Regional Park Act 1966</b>

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## Appendix A to Paper RP/77/23



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14 December 2023

Dear Matthew

### **RE: CONSULTATION ON THE LONDON BOROUGH OF TOWER HAMLETS DRAFT LOCAL PLAN (REGULATION 18) - LEE VALLEY REGIONAL PARK AUTHORITY REPRESENTATIONS**

Thank you for consulting the Regional Park Authority on the draft Local Plan (Regulation 18) document. A report on this matter was considered by the Authority's Members, at the Lee Valley Regeneration and Planning Committee on the 14 December 2023, when the following comments were agreed.

#### **Draft Local Plan Regulation 18 Version**

##### **Vision and Objectives**

The Authority supports the Vision for the Borough and the focus on promoting and supporting culturally diverse and inclusive communities whilst delivering high quality homes and neighbourhoods, and protecting the Borough's assets, and historic character. The Regional Park within Tower Hamlets forms an important part of the Borough's blue and green infrastructure resource, contributing to its open space and heritage assets. The vision and objectives recognise the opportunities provided by this network of green and blue spaces for leisure, recreation and entertainment and the contribution they make to health and well-being.

A strong policy framework will be needed to protect this network and increase provision alongside development. 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 currently 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.

### **Delivering the Local Plan and Tall Buildings Policy**

It is noted that the locations selected in the draft Local Plan to accommodate growth will bring significant levels of high density development, usually in the form of tall residential buildings within close proximity to the Regional Park areas. For example East India Dock Basin falls within the Isle of Dogs and South Poplar Sub-area, and the site allocations at Bromley-by-Bow and Blackwall Trading Estate and Leamouth Road Depot within the Leaside sub area are located adjacent to the Park at Three Mills and Bow Creek Ecology Park respectively.

This policy for growth has the potential to both impact upon the Park as a result of increased development pressure and associated environmental impacts and offer opportunities that would benefit the Regional Park, such as investment in open spaces, improved access routes between areas and better public transport provision.

The requirements set out under Policy DV1 'Areas of Growth and Opportunity within Tower Hamlets' are therefore welcomed particularly DV1 Part 6 which requires developments to deliver infrastructure and facilities to meet the demand from the development proposed, including green grid projects such as Lea River Park, new parks and public open spaces. This infrastructure, if provided adjacent to sites such as EIDB and Bow Creek Ecology Park for example would, if designed sensitively, assist in alleviating some of the pressures these areas face from increased footfall, recreational pressure and disturbance to habitats and wildlife.

The detail contained within the Tall Building Policy PS2 is also supported. This is seeking to protect important locations and assets from potential negative impacts of taller buildings; PS2 Part 4b) and Part 5 are endorsed. These require respectively that proposed height takes account of "the need to avoid harm to the significance of heritage assets, areas of ecological importance, or the enjoyment of the borough's open spaces" and that tall buildings meet a set of design criteria. A minor amendment is proposed for policy PS2 Part 4c to ensure it takes into account the impacts of proposed heights on neighbouring land (such as East India Dock Basin) not just developments – please see the amendment below in red highlighted text.

#### **4. Proposed heights must take account of:**

- c. impacts on daylight, sunlight, and overshadowing for neighbouring land and developments;**

The inclusion of a set of Tall Building Zone Principles (Table 3) under Policy PS2, is welcomed. The Authority supports the principle set out as part of Zone E (Leamouth) which includes EIDB that, "Tall buildings in this zone should step down towards the River Thames and the East India Dock Basin and ensure glimpses and views across the zone."

However development should also be set back from the Park boundary and the edge of the open space at EIDB. The Tall Building Principles under Policy PS2 should allow for the provision of sufficient scale transitions, with buildings both stepping down and set back as they approach the Park edge which will also include the waterside edge along the towpath within Tower Hamlets. Development close to the Regional Park needs to be of a human scale and not overwhelm the visitor with cumulative impacts considered in terms of views and skyline. Around EIDB for example residential

development adjoining the western edge (at Virginia Quay) reaches only 5 storeys, allowing for views out and a more human scale – any development immediately to the east should follow a similar principle allowing for a more gentle transition between the openness of the site and any new built form. It is suggested that tall building principles include a maximum height for development adjacent to open spaces allowing for a transition to higher buildings towards the centre of the site.

### **Open Space and Biodiversity**

The Authority supports Policy BO1 Green and Blue Infrastructure which seeks to maintain and enhance the provision of green infrastructure across the borough and endorses Part 1g) which identifies as part of this green infrastructure network the delivery of “enhanced new strategic publicly accessible open spaces at Lea River Park (including Leaway) and within site allocations”. PDF Area Proposals 1.A.2 support the development and delivery of the Leaway and the Lea River Park and commit the Authority to working with stakeholders to achieve this connection. The Authority welcomes supporting text (para 19.24) which highlights the importance of providing a new continuous north south route through Lea Valley connecting the Lee Valley Regional Park to the River Thames as well as new pedestrian footbridges.

It is noted that policy requires strategic development proposals to provide an increase in new open space on-site in proportion to the scale of development proposed, (BO1 Part 1c). This would be significant for development sites adjacent to the Regional Park for example at EIDB where additional complementary open space provision is vital to maintain the longevity of the Basin and its ecological and heritage assets.

The Council's policy for its Blue Spaces Policy BO1 Part 3 is also supported. This seeks to protect the integrity of the Borough's water spaces recognising the opportunities to maximise the ecological, aesthetic and water quality values of the water space alongside improved accessibility and opportunities for public use and enjoyment. Supporting text (para 19.30) highlights the need to consider the cumulative impact of existing and proposed new water related uses to ensure “there is no adverse impact on the character and openness of the borough's water space and amenity of surrounding residents”. This issue of cumulative impacts and balancing different demands has been raised by the Authority on a number of occasions. It would be helpful if this aspect could be covered in policy rather than just supporting text.

The Authority notes the draft Local Plan policy position that major development should contribute to the delivery of new or enhanced publicly accessible open space on site. The inclusion of criteria to guide the quality and scope of this provision is supported, (BO2 'Open Spaces and the Green Grid Network'). Part 3 of the policy is also noted and endorsed, this states that development should not solely rely upon existing publicly accessible open space to contribute towards on-site communal amenity space and child play space. Likewise support is also offered for Part 4 of the policy which establishes that development will be expected to demonstrate how it will enhance and not negatively affect the borough's accessible open space.

### **Lee Valley Regional Park**

The Authority welcomes the reference to the Regional Park in supporting text and the acknowledgement that it forms an important part of the borough's publicly accessible open space, and its green grid and water space network. The Authority is very clear in its work to improve and enhance the Park's open spaces and linear waterside routes within Tower Hamlets that these can make a significant contribution to 'creating healthy

and liveable communities' particularly when these spaces are complemented by new open space and habitats delivered as part of development.

The Council's support for the Park Development Framework where it relates to the borough is also welcomed (para 19.50) as is the commitment given to partnership working with the Authority and other stakeholders.

It should be noted that reference to the Park Plan is no longer required and that the spelling of Lee when referring to the Regional Park should be Lee not Lea. It is suggested that the following wording is added to the Glossary

**Lee Valley Regional Park Development Framework – a suite of documents setting out the Lee Valley Regional Park Authority's plan of proposals for the development and use of the Regional Park including the Vision, Aims Principles document, Area Proposals, Landscape Strategy, and Park Development Framework Strategic Policies**

It would also be helpful if supporting text referenced the fact that the Lee Valley Regional Park Authority is a statutory authority created by the Lee Valley Regional Park Act 1966 (The Park Act) and that it has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the Park. The requirement to prepare a plan setting out proposals for the future management and development of the Regional Park is set out under Section 14 (1) of the Park Act. It would also be helpful to explain that riparian authorities such as Tower Hamlets are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14(2) (b)). The Park Development Framework Area Proposals are relevant in terms of Section 14 (2) of the Park Act and are formal statements of the Authority's position in respect of development within the Regional Park. The boundary of the Regional Park should be included on the Policies Map as per the current version.

### **Water Spaces**

The Authority endorses the detail set out in Policy BO3 Water Spaces and the emphasis placed on protecting the openness of water spaces – it is the waterways that define the Regional Park in its southern extremities and provide the connections between pockets or islands of open space and important heritage. It is therefore critical that development is set back from the water's edge as required under Policy BO3 1h) and that the function of this water edge is considered given the many demands placed on it, i.e. for public access, wildlife corridor, flood mitigation etc.

### **Biodiversity and Net Gain**

Policy BO4 'Biodiversity and access to nature' is welcomed and considered comprehensive in terms of the concerns and impacts faced by the Regional Park within Tower Hamlets. In particular the policy requirement that development should not have a negative impact on open spaces or water spaces (BO4 1c)) is supported. This refers (supporting text para 19.73) to impacts such as overshadowing, light spill and issues of bird strike due to bird migration routes along the River Lea for example. These are all points the Authority has already raised as part of its planning consultee role when responding to development along the waterways and adjacent to EIDB. There are clear links here with provisions under Policy BO3 1h) which requires suitable setbacks from the water's edge.

BO4 Part 2 covers the requirements of BNG and the Authority endorses the manner in which this has been set out to ensure that biodiversity enhancements are delivered even from a very low level of onsite baseline biodiversity. The policy requirement that development achieves a minimum 2.5 biodiversity units per hectare increase or 30% gain (whichever is the higher) in habitat value for wildlife compared with pre-development baseline will hopefully avoid a scenario where 10% of nothing is nothing.

Policy BO5 'Urban Greening' is welcome and its application to all developments irrespective of size is noted. Table 11 sets out the different types of landscaping, habitat creation and building design that count as Urban Greening Factors. The Authority welcomes the inclusion of native wetland vegetation along the rivers and canals as an additional urban greening factor relevant to the borough to support rehabilitation and rewilding of the Borough's water spaces.

Policy BO6 'Play and recreation spaces' is also important in terms of the Regional Park within the borough. It states that provision for sports, recreation and play should be a fundamental part of major new developments and should be designed to complement adjacent areas of open or biodiverse space. This is supported as the integration of space for sport, recreation and play within development will help to reduce pressure on sites such as EIDB where there is limited capacity to meet the full range of leisure needs and where space for nature also needs to be maintained and enhanced.

### **Heritage**

The Authority endorses Policy PS6 'Heritage and Historic Environment' and the emphasis placed on understanding the historic environment and its role in informing development. This supports the PDF Area 1 proposals for heritage which would apply to the Park within Tower Hamlets. These seek to ensure historical features of special interest within the landscape and associated with the waterways are conserved and interpreted and that views to key landmarks within and outside the Regional Park are protected. At East India Dock Basin the interpretation of listed heritage features and structures are to be protected, enhanced and improved as an integral part of its development as a visitor attraction/destination and gateway to the Regional Park.

### **Movement and Connectivity**

The Movement and Connectivity policy identifies a clear role for development in terms of supporting and contributing to pedestrian and cycle networks within the borough and connections through to surrounding areas. The Authority supports this policy position. The justification text is also clear as to the further infrastructure investment and interventions required to meet the demands arising from future growth, to reduce severance, improve cross river and other waterways connections and improve connectivity for pedestrians and cyclists. Officers will need to liaise with the borough in relation to interventions proposed that might improve connectivity for visitors and users of the Park such as the proposal to remodel the Leamouth Junction to the north west of EIDB for safe cycle and pedestrian movement, and the proposal to engage further with future partnership work involving the London Borough of Newham to deliver up new crossings of the River Lea between EIDB and Three Mills as part of the Leaway and Lee River Park.

### **Site Allocations**

The vision and objectives for the Leaside sub area are welcomed in particularly the aim to deliver the Lea River Park (including the Leaway) which will "provide a new strategic publicly accessible green space and a series of new pedestrian and cycling

routes, linking the River Lea to London's wider green grid network." Reference should be made to the Regional Park under this part of the vision as follows:

*linking the River Lea to London's wider green grid network including the Lee Valley Regional Park."*

The site allocations 3.4 Bromley-by-Bow, 3.2 Leven Road and 3.5 Blackwall Trading Estate and Leamouth Road Depot should all include a reference to the Regional Park given its proximity –

- **Bromley-by-Bow** - Three Mills Island sits opposite and forms an important heritage site and visitor attraction within the Regional Park. This should be identified as a planning designation on the site pro-forma. Three Mills Green provides valuable open recreational space and is on occasion used for music and cultural events. This should also be highlighted in the site allocation description.

The Authority supports the requirement that new public open spaces should be created along the waterfront, particularly focused on the area where Three Mills Lane crosses the River Lea. The requirement to also enable public access along the waterfront should take into consideration the need to provide improved waterside habitats adjacent to the River Lea, given that access is already available on the opposite side of the waterway.

The delivery of improvements to the green grid routes along Three Mills Lane, and Imperial Street, with good onward connections across the A12 to join the rest of the green grid is endorsed. This accords with proposals set out in the PDF Area 1 under Visitors proposals.

- **Leven Road** – this site allocation does not sit adjacent to the Park boundary but the Authority notes and welcomes the inclusion of overarching principles which require that development should step back from the River Lea to avoid excessive overshadowing and enable activation of the riverside and that development improves walking and cycling connections to, and from within the site - particularly to link with the River Lea Park walk, and DLR stations at Langdon Park and East India.
- **Blackwall Trading Estate and Leamouth Road Depot** – this site is located opposite the Regional Park at Bow Creek Ecology Park (which lies within Newham). The Authority supports the principle that development should incorporate a "significant amount of riverside public open space, with elements of biodiversity that complement the adjacent Bow Creek Ecology Park Site of Importance for Nature Conservation across the River Lea in the London Borough of Newham." Likewise the Authority welcomes the principles that seek to ensure development improves walking and cycling connections particularly along the river and towards the new park and bridge crossings at the Leven Road site allocation, and towards Canning Town underground station in the London Borough of Newham. It is also noted that the Council is seeking the provision of a connector bridge to run underneath the A13 to connect both sides of the site, which would also complete the pathway up the River Lea, and allow pedestrians and cyclists to travel north and south without needing to cross the busy A13. This would be an important improvement for people wishing to access the Park.



Tall buildings should be set well back from the waterside edge of the site particularly in the south where the site sits directly opposite Bow Creek Ecology Park. This would then provide space for habitat creation set within informal areas of open space as well as the more formal public amenity space required to meet the needs of new residents.

The Authority looks forward to engaging further with Borough officers on the matters raised above prior to the next stage of the Local Plan process.

Yours sincerely

**Claire Martin**  
**Head of Planning**

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**Appendix C – Extract from Policy PS2 Tall Buildings - design criteria**

**3. All proposals for tall buildings must demonstrate how they provide significant public benefits, and in particular must meet the affordable housing requirements set out in Policy HF2, including provision of 40% affordable housing, with 85% of that affordable housing delivered as social rented homes.**

**4. Proposed heights must take account of:**

- a. the need for variation in heights within a particular development proposal and across different development proposals within an area;**
- b. the need to avoid harm to the significance of heritage assets, areas of ecological importance, or the enjoyment of the borough's open spaces;**
- c. impacts on daylight, sunlight, and overshadowing for neighbouring developments;**
- d. the need to maintain sky views from street level from within clusters of tall buildings; and**
- e. maximum heights within specific allocations or tall building zones, as set out in table 4 and figure 10.**

**5. All proposals for tall buildings must demonstrate how they meet the following design criteria in order to deliver high-quality homes:**

- a. promote the health and well-being of all residents;**
- b. be of a height, scale, mass, volume, and orientation that are proportionate to their role, function and the importance of the location in the local, borough-wide and London context; and take account of the character of the immediate context and of their surroundings;**
- c. achieve exceptional architectural quality and innovative and sustainable building design, using robust, durable, attractive, and contextually appropriate materials throughout the building, and responding to the local character in the architectural language of the development;**
- d. enhance the character and distinctiveness of an area without adversely affecting designated townscapes and landscapes (including building/roof lines);**
- e. avoid causing harm to national or borough-designated landmarks, heritage assets, Conservation Areas, key views and other historic skylines, and their settings;**
- f. provide a positive contribution to the skyline during both the day and night time;**
- g. maintain adequate distance between buildings to ensure a high-quality ground floor experience and enhanced residential environment;**

- h. present a human scale of development at street level and comprise an attractive and legible streetscape that takes into account the use of the public realm for a variety of users and includes active uses at ground floor level;**
- i. provide an adequate quantum of high-quality communal open space, play areas and public realm (where residential uses are proposed), and where appropriate provide shared facilities at the ground floor level to encourage social cohesion;**
- j. demonstrate that the development does not adversely impact on the microclimate and amenity of the application site and the surrounding area;**
- k. demonstrate consideration of public safety requirements as part of the overall design, including the provision of safe evacuation routes and two staircases;**
- l. comply with civil aviation requirements and not interfere to an unacceptable degree with telecommunications, television and radio transmission networks and river radar equipment; and**
- m. not prejudice future development potential of adjacent/ neighbouring buildings or plots.**