



**LONDON BOROUGH OF TOWER HAMLETS PROPOSED
SUBMISSION LOCAL PLAN REGULATION 19 CONSULTATION**

Presented by the Head of Planning.

SUMMARY

The London Borough of Tower Hamlets are consulting on their Proposed Submission draft Local Plan, following consideration of the responses made to the consultation on the Regulation 18 version in late 2023. This updated version of the Local Plan will be submitted to the Secretary of State (under Regulation 19), alongside any final comments or 'representations' during the winter 2024/2025. Representations and comments are now invited on the soundness of the Submission Local Plan; whether the Plan has been positively prepared, justified, and whether it is effective and consistent with National and Regional Policy.

The Authority made detailed comments on the earlier version of the draft Local Plan (the Regulation 18 version) and offered support for a number of draft policies and the corresponding supporting text relevant to the Regional Park within Tower Hamlets. Some amendments to policy content were also sought, seeking additional reference to the Regional Park, including under the Site Allocation policy and the need for additional guidance to be included as part of the Tall Buildings policy.

The Authority's draft response to the Submission Local Plan is set out in the letter attached as Appendix A to this report. The representations are largely supportive as many of the policies have remained largely unchanged and additional reference to the Regional Park has been included. A couple of representations are proposed objecting to the lack of policy guidance on matters relating to Tall Buildings Policy, their set back from open and waterside spaces, and the detail within the Site Allocations in relation to the adjacent areas of the Regional Park. Appendix C to this report tracks the Council's response and changes made in respect of the Authority's comments at the previous Regulation 18 consultation stage.

RECOMMENDATIONS

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 Proposed Submission Local Plan Regulation 19 document.

BACKGROUND

- 1** The London Borough of Tower Hamlets (LBTH) has reached the final stage in the preparation of its new Local Plan and is consulting on the Proposed Submission version. It is accompanied by a suite of evidence base documents, an Integrated Impact Assessment and a Habitats Regulations Assessment. The LBTH are proposing to submit the draft Submission Local Plan to the Secretary of State for an Independent Examination in Public, along with all representations received, during the winter or early in 2025. The timescale for the Examination stage is currently proposed for early/mid 2025 with Adoption in the winter of 2025.
- 2** The LBTH have recognised the need to update specific objectives, policies and guidance contained in, and informing the Plan due to changes in national and regional guidance, in particular the London Plan (2021), the Levelling Up & Regeneration Act and the National Planning Policy Framework (December 2023). There is a need to ensure that a new Local Plan for the borough best responds to the needs and aspirations of the local community, responding to the impacts from the COVID-19 pandemic and cost of living pressures, and providing the best opportunity for local residents to thrive in Tower Hamlets.
- 3** The new Local Plan will also need to plan for parts of the borough where the planning powers, currently held by the London Legacy Development Corporation (LLDC) planning authority, are soon to be handed back to the borough (December 2024). 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.
- 4** 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.
- 5** 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.
- 6** 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.

OUTCOME OF THE LVRPA'S PREVIOUS COMMENTS ON THE DRAFT LOCAL PLAN AND RESPONSE TO PROPOSED SUBMISSION LOCAL PLAN

- 7 The Authority's previous response to the draft Local Plan (regulation 18 version) supported 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, including historic character. The Regional Park within Tower Hamlets was highlighted as an important part of the Borough's blue and green infrastructure resource, contributing to its open space and heritage assets, the leisure and recreational opportunities available within the borough and benefits for health and well-being.
- 8 It was recognised that a strong policy framework would be needed to protect this network and increase provision alongside development. Support was offered for policies on Delivering Growth, Open Space and Biodiversity, Heritage and Movement and Connectivity where these related to the Regional Park.
- 9 The Site Allocations under the Leaside Sub Area were identified as the most relevant to the Park being situated on the eastern side of the borough. Comments were made in respect of three of these allocations:
 - 3.4 Bromley-by-Bow, 1,300 homes (400 on Imperial Street site, 200 on North Bow River Village site, 700 on Tesco site) and 20,000sqm commercial/community floorspace;
 - 3.2 Leven Road (indicative site capacity 2,800 homes and 8,500sqm commercial floorspace); and
 - 3.5 Blackwall Trading Estate and Leamouth Road Depot 775 homes (375 on depot site, 400 on trading estate site), 35,000sqm non-residential floorspace 6,500sqm replacement depot (if needed).

Although located outside the Park all three are situated close or adjacent to the boundary.
- 10 The Authority's previous response sought changes to policy and supporting text to include additional reference to the Regional Park and in particular East India Dock Basin, and to add the Regional Park as a planning designation under the relevant Site Allocations. The Authority also identified the need for additional guidance as part of the tall buildings policy to include a requirement that these be set back from the Regional Park and the waterside edge.
- 11 Most of these matters have been addressed. The Table at Appendix C to this report provides a summary of the Authority's previous comments to the Regulation 18 version of the Local Plan and tracks the changes that have been made by LBTH and those matters outstanding. The final column highlights those matters that will be formally supported and where further change is needed to policy and/or supporting text. In these cases an objection will be raised as part of the formal representation process.

- 12 The letter at Appendix A to this report sets out the Authority's formal response to the Submission version of the Local Plan. At this stage in the consultation on the Local Plan stakeholders such as the Authority are advised to make representations on any issues regarding the soundness of the draft Local Plan based on the four tests of soundness, which means considering whether the plan has been 'Positively Prepared' involving the relevant stakeholders in putting the plan together, 'Justified' with all policies are based on robust and up-to-date evidence, 'Effective' so that the plan will work as intended given the realities of the development industry and whether it is consistent with National and Regional Policy. Those matters included within the letter at Appendix A will be formally submitted as representations to the Submission Local Plan in time for the consultation deadline of the 28 October.

ENVIRONMENTAL IMPLICATIONS

- 13 There are no environmental implications arising directly from the recommendations in this report but the Proposed Submission 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

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

HUMAN RESOURCE IMPLICATIONS

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

LEGAL IMPLICATIONS

- 16 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.
- 17 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

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

EQUALITY IMPLICATIONS

- 19 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 September 2024
Proposed Submission Local Plan Regulation 19
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	Table 1 Assessment of Proposed Submission Local Plan in relation to comments previously made by LVRPA

LIST OF ABBREVIATIONS

LBTH	London Borough of Tower Hamlets
PDF	Park Development Framework
SINC	Site of Importance for Nature Conservation
EIDB	East India Dock Basin
DLR	Docklands Light Railway
BNG	Biodiversity Net Gain
LVRPA	Lee Valley Regional Park Authority
LLDC	London Legacy Development Corporation

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Appendix A to Paper RP/89/24



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24 October 2024

Dear Natalya

RE: CONSULTATION ON THE LONDON BOROUGH OF TOWER HAMLETS PROPOSED SUBMISSION LOCAL PLAN (REGULATION 19) - LEE VALLEY REGIONAL PARK AUTHORITY REPRESENTATIONS

Thank you for consulting the Regional Park Authority on the Proposed Submission Local Plan (Regulation 19) document. A report on this matter was considered by the Authority's Members, at the Lee Valley Regeneration and Planning Committee on the 24 October 2024, when the following comments were agreed. These are focused on how far the current draft Local Plan addresses the matters of concern previously raised by the Authority and whether as a result the Authority considers the plan to be sound. The representations set out below include modifications to address the matters still outstanding and will also be formally submitted via the online representation process.

Proposed Submission Local Plan Regulation 19 Version

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. As previously outlined it 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.

The Proposed Submission version of the Local Plan retains the vision and objectives previously supported by the Authority which 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.

Delivering the Local Plan

The Authority maintains its support for the requirements set out under Policy DV1 'Areas of Growth and Opportunity within Tower Hamlets', in particular DV1 Part 6 which requires developments to deliver infrastructure and facilities to meet the demand from the development proposed and resulting population growth, including green grid projects such as Lea River Park, new parks and public open spaces.

As requested by the Authority a specific reference to East India Dock Basin has been added under para 11.16 of the Supporting text and this is supported. East India Dock Basin is a key area of open space within the Isle of Dogs and South Poplar growth sub area located adjacent to the Tall Building Zone E and supporting text (red font) now identifies East India Dock Basin as an example of a green grid project that will need to be delivered. It reads

"A range of facilities, services, and infrastructure will need to be delivered. This includes:

- b. green grid projects (including East India Dock, the Lea River Park and Whitechapel Green Spine);

Policy DV8 'Site Allocations' sets out a list of requirements specific to the Site Allocations. A new bullet point f) has been added to this policy which states:

"Development proposals on site allocations should meet the following requirements;

- f. provide a buffer zone of 8m to fluvial watercourses and 16m to tidal watercourses;"

This new requirement is supported as it will be relevant to Site Allocations that are located adjacent to the Regional Park and the River Lee/Bow Creek, including Bromley-by-Bow, Leven Street and Blackwall Trading Estate and Leamouth Road Depot. As the supporting text explains para 11.88 "Development which is in proximity to watercourses must incorporate buffer zones to support the incorporation of flood risk management into development proposals."

Tall Buildings Policy

The detail contained within the Tall Building Policy PS2 was noted and previously supported by the Authority. This is seeking to protect important locations and assets from potential negative impacts of taller buildings;

Tall Building Policy PS2, Part 4b) and Part 5 are supported. They were previously endorsed by the Authority as they aim to ensure, 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 detailed design criteria.

A minor amendment was sought 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. The wording proposed by the Authority has been incorporated into the policy text – red font, and this is welcomed. Policy PS2 Part 4c now states:

4. Proposed heights must take account of:

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

The Authority notes the Tall Building Zone Principles set out in Table 3 as part of Policy PS2. East India Dock Basin would fall within Zone E (Leamouth) and the Authority supports the principle Zone E point b) which states, "Tall buildings in this zone should respect the primacy of the Canary Wharf zone, and step down towards the River Thames and the East India Dock Basin and ensure glimpses and views across the zone."

However the Authority also proposed that the Tall Building Principles under Policy PS2 should require development to be set back from the Park boundary and the edge of the open space at EIDB, in other words buildings should be both stepping down and set back as they approach the Park edge, which would also include the waterside edge along the towpath within Tower Hamlets.

The Authority objects to the lack of policy guidance on this matter under Policy PS2. It is important to ensure the scale of development immediately adjoining the open spaces of the Regional Park takes account of the character and experiences of being in the Park, allowing for views out and providing a more gentle transition between the openness of the site and any new built form along its boundary. As previously stated the tall building principles should 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 Policy

The Authority maintains its support for **Policy BO1 'Green and Blue Infrastructure'** in particular:

- Part 1c 'Green Spaces' which requires strategic development proposals to provide an increase in new open space on-site in proportion to the scale of development proposed.
- Part 1g) which identifies as part of the green infrastructure network the delivery of "enhanced new strategic publicly accessible open spaces at Lea River Park (including Leaway) and within site allocations".

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 is also endorsed. As previously discussed this policy captures the intent of the Authority's PDF Area Proposals 1.A.2 which 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.

- Part 3 of Policy BO1 'Blue Spaces' as this recognises the opportunities to maximise the ecological, aesthetic and water quality values of the Borough's water space alongside improved accessibility and opportunities for public use and enjoyment.

The Authority's previous response sought a policy reference under Part 3 of BO1 to also ensure the cumulative impacts on the water spaces (within the Borough and the

Park) are considered, recognising the need to balance different demands, such as for example, access, biodiversity, and recreation. Whilst it is recognised that this aspect is covered in supporting text 18.27 (as before), the Authority objects to a lack of policy detail on this matter under Part 3 Blue Spaces Policy BO1.

BO2 Open Spaces and the Green Grid Network

The Authority notes and welcomes the retention of policy in the Proposed Submission Local Plan, under BO2 'Open Spaces and Green Grid Network', that states that major development should contribute to the delivery of new or enhanced publicly accessible open space on site and the inclusion of criteria to guide the quality and scope of this provision is supported. Parts 3 and 4 of the policy are also endorsed as before, as these recognise that development should not solely rely upon existing publicly accessible open space to contribute towards on-site communal amenity and child play space and 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

Reference to the Regional Park was included under supporting text to Policy BO2 'Open Spaces and Green Grid Network' in the previous Regulation 18 draft Local Plan and this has been carried across into the Proposed Submission version. Additions to the supporting text sought by the Authority in respect of its statutory role and responsibilities have been included as has support for the Park Development Framework (PDF). The Authority supports these additions which are now under paragraph 18.48 as set out below in red font/text:

18.48 The Lee Valley Regional Park 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. **The Lee Valley Regional Park Authority is a statutory authority, with responsibilities to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment, and nature conservation throughout the park. As such, the council will work together with the Lee Valley Regional Park Authority and the Environment Agency to support proposals set out in the Tower Hamlets' Local Biodiversity Action Plan and the Park Development Framework where they relate to the borough. We will also work with neighbouring authorities and relevant stakeholders to support the delivery of the Lea River Park (including the Leaway), which connects Queen Elizabeth Olympic Park and the Lee Valley Regional Park to the Royal Docks and the River Thames through a new continuous walking and cycling route along the River Lea. Further development principles and guidance are included in the Lea River Park Primer and Lea River Park Design Manual.**

No reference has been made to the Lee Valley Regional Park Act 1966 (Park Act) as requested, nor the suggested Sections of the Park Act which explain the plan making relationship between riparian authorities such as LBTH and the Authority. The Authority's proposal that a description of the PDF should be added to the Glossary is also missing.

Whilst it is recognised that reference to detailed sections within the Park Act may not now be relevant given the additional text included under para 18.48 above it is still considered relevant to include a reference to the Park Act as the legal framework underpinning the Regional Park and its relationship with riparian boroughs such as

Tower Hamlets. This could easily be added to part of the new text inserted at 18.48 as shown below (additional text in blue font):

18.48 The Lee Valley Regional Park 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. **The Lee Valley Regional Park Authority is a statutory authority (created by the Lee Valley Regional Park Act 1966), with responsibilities to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment, and nature conservation throughout the park. As such, the council will work together with the Lee Valley Regional Park Authority and the Environment Agency to support proposals set out in the Tower Hamlets' Local Biodiversity Action Plan and the Park Development Framework where they relate to the borough.**

It is also still considered relevant that an entry should be made to the Glossary to provide both an introduction and brief explanation for the Park Development Framework as this is referred to in supporting text to Policy BO2. The proposed wording is as follows:

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

The above amendments will therefore be sought as part of the Authority's representations regarding this section of the Local Plan.

Water Spaces

The Authority maintains its support for the detail set out in Policy BO3 'Water Spaces' and the emphasis placed on protecting the openness of water spaces. In particular it is noted that Policy BO3 point 1h) has been carried across into the Proposed Submission Local Plan. This requires development to provide "suitable setbacks from water space edges to allow maintenance of defences, which mitigate flood risk, emergency access, future upgrades to flood defences and river banks and to allow riverside walkways, canal towpaths and cycle paths for equal access, where appropriate". The waterways define the Regional Park in its southern extent and provide the connections between important areas of open space and heritage.

Biodiversity and Net Gain

The Policy on biodiversity and net gain, BO4 'Biodiversity and access to nature' previously supported by the Authority has been retained within the Proposed Submission Local Plan and this is welcomed. This will ensure a comprehensive approach in terms of protecting and enhancing biodiversity and delivering BNG.

The policy requirement that development should not have a negative impact on open spaces or water spaces (BO4 1c)) is supported together with the detail provided in supporting text para 18.75 which identifies these impacts, including overshadowing, light spill and issues of bird strike due to bird migration routes along the River Lea for example. Interestingly the supporting text highlights tall buildings as an example of the type of development where these issues are likely to occur stating that: "the

overshadowing and light spill effects of tall buildings can have negative impacts on ecosystems in both blue and green spaces, and in many cases it is preferable to set taller buildings back from the edge of these spaces and step heights down as developments approach the water.”

The reference made to “setting taller building back from the edge of these spaces” adds weight to the Authority’s previous comment and concerns about the Tall Buildings policy PS2.

It is noted that Policy BO4 Part 2 has retained the 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. This is endorsed, as it should ensure that biodiversity enhancements are delivered even from a very low level of onsite baseline biodiversity.

Play and Recreation

The Authority maintains its support for Policy BO6 ‘Play and recreation spaces’ which is retained within the Proposed Submission Local Plan and the new policy text added encouraging developers to consider creating play spaces with a mixed range of use and with areas and features which enable those with limited accessibility and additional needs to be able to enjoy play space.

Heritage

The Submission draft Local Plan has retained the comprehensive policy PS6 ‘Heritage and the Historic Environment’ previously endorsed by the Authority. Part 1 of Policy PS6 aims to ensure proposals conserve or where appropriate enhance heritage 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. This policy aligns with the Authority’s PDF Proposals for heritage which would apply to the Regional Park within Tower Hamlets and are supported. 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.

Movement and Connectivity

The Authority endorses the policies included within Movement and Connectivity section of the Proposed Submission Local Plan. In particular Policies MC1 ‘Sustainable travel’ and MC2 ‘Active travel and healthy streets’ are supported as these provide a clear framework for development in terms of safeguarding, providing for and contributing to pedestrian and cycle networks within the borough and connections through to surrounding areas.

The Authority also supports the planned and priority infrastructure interventions, bridge links and other access improvements listed under paras 19.19, 19.20 and 19.22 of the supporting text. The project and feasibility work to assess and deliver appropriate connections, including cross river bridge links and pedestrian/cycle routes is becoming increasingly urgent to meet the demands arising from future growth, to reduce severance, and provide access to open space, including the Regional Park.

Officers from Authority should be involved in these projects as they develop particularly where these will improve connectivity for visitors and users of the Park. This includes the proposal to remodel the Leamouth Junction to the north west of EIDB for safe cycle

and pedestrian movement, the proposed bridge connection between Good Luck Hope adjacent to EIDB across the river onto the Limmo Peninsula and the ongoing 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 Leaside Sub Area includes three Site Allocations that are relevant to the Regional Park due to their location either adjacent or close to the Park boundary. The Authority supports the reference to the Lee Valley Regional Park that has been added to the Vision statement for the Leaside Sub Area as follows:

“24.5 The development of the Lea River Park (including the Leaway) 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, **including the Lee Valley Regional Park.**”

It is noted that additional text has been added to the objectives for the Leaside Sub Area under Objective f. and this together with Objectives a) and b) is supported as follows:

- a. Improve strategic connections to overcome the physical barriers to movement created by the A12, A13 and the waterways
- b. Deliver the Lea River Park (including the Leaway) to provide a network of interconnected water and open spaces, green walking and cycling routes and improve access to and along the River Lea.

and the additional wording added to objective f) as shown in red font below:

- f) Optimise former industrial/employment land and protect designated industrial areas whilst sensitively integrating industrial activities into their site context **and enhancing the public realm and pedestrian and cycle connectivity.**

This additional text is considered relevant in terms of development proposals on site allocations adjacent to the Regional Park and how they might connect into or include public realm that complements the Park area.

3.4 Bromley-by-Bow Site Allocation

The Authority objects to the lack of any specific reference to the Regional Park under the Bromley-by-Bow site allocation, this should be included within the ‘Planning Designation’ section of the pro-forma for the site. Three Mills Green is situated opposite the Site allocation and forms an important heritage site and visitor attraction within the Regional Park providing valuable open recreational space, which is also used for music and cultural events. This should also be highlighted in the site allocation description.

Requirements for additional public access along the waterfront of the Bromley-by-Bow site should also 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 Authority supports the additions to the site allocation text where new principles have been included under Routes and Streets, requiring “measures to improve safety in the underpasses beneath the A12” as well as links to the east across the River Lea

and the need to include "at-grade pedestrian and cycle crossings of the A12". These measures would assist in improving safe access to and from the Regional Park at Three Mills and safe links to public transport nodes.

3.2 Leven Road Site Allocation

This site allocation is not adjacent to the Park boundary but the Authority previously welcomed 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. These principles have been carried across to the Proposed Submission version of the Local Plan and are supported.

3.5 Blackwall Trading Estate and Leamouth Road Depot

This site is located in a key position opposite the Regional Park at Bow Creek Ecology Park (which lies within Newham). The Authority maintains its support for the principle included in the Site Allocation 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."

The Authority also supports 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.

The Authority objects to the lack of clarity regarding the height strategy referred to in the Site Allocation. The Authority previously commented that the Site Allocation should ensure tall buildings would be set well back from the waterside edge particularly in the south where the site sits directly opposite Bow Creek Ecology Park.

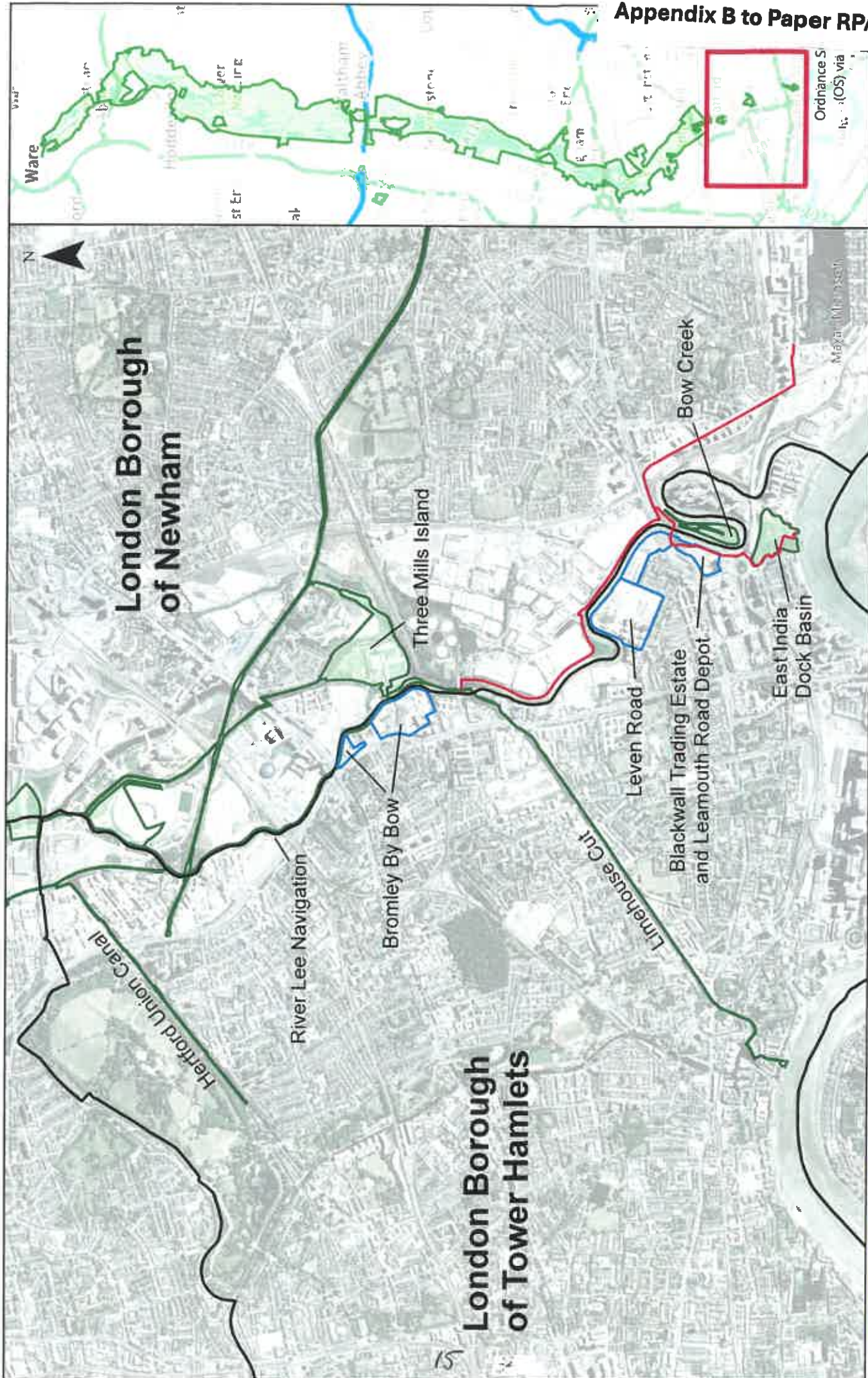
This would then provide space for habitat creation set within informal areas of open space as well as the more formal public amenity space required to meet the needs of new residents.

The height strategy included in the Site Allocation is confusing as it states "The tallest points should be located towards the southern end of the site. Heights should step down towards the centre of the site, and rise up again along the River Thames in the northern part of the site." The Authority's concern is that tall buildings should be set well back from the waterside edge of the site, i.e. the River Lee/Bow Creek, particularly in the south where the site sits directly opposite Bow Creek Ecology Park. Space should be provided for habitat creation adjacent to the waterside set within informal areas of open space to buffer and complement the Ecology Park opposite. This should be in addition to the provision of more formal public amenity space required to meet the needs of new residents.

The Authority would welcome the opportunity to engage 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



Lee Valley Regional Park within London Borough of Tower Hamlets

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14/10/2024
Produced by Corporate GIS (HH)



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Table 1 Assessment of Proposed Submission Local Plan in relation to comments previously made by LVRPA

<p>Summary of LVRPA Comments to the London Borough of Tower Hamlets Draft New Local Plan Regulation 18 Consultation version</p>	<p>London Borough of Tower Hamlets response. Proposed changes/new text shown in red font</p>	<p>LVRPA response and proposed further changes to the Proposed Submission Local Plan Regulation 19 - suggested wording in blue bold font. Red text indicates changes already proposed by LBTH</p>
<p>Vision and Objectives The Authority supported 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 Vision recognised 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.</p>	<p>No changes have been made in respect of the areas of support. Note that Fig 3 'Wider Strategic Context' which includes a notation for the Lee Valley Regional Park has been reproduced as part of the Proposed Submission Local Plan</p>	<p>No further comment.</p>
<p>Delivering the Local Plan The Authority welcomed the requirements set out under Policy DV1 'Areas of Growth and Opportunity within Tower Hamlets', in particular DV1 Part 6 which requires developments to deliver infrastructure and facilities to meet the demand from the development proposed and resulting population growth, including green grid projects such as Lea River Park, new parks and public open spaces.</p>	<p>Policy DV1 has been retained within the Proposed Submission Local Plan.</p>	<p>The Authority maintains its support for Policy DV1.</p>

<p>Summary of LVRPA Comments to the London Borough of Tower Hamlets Draft New Local Plan Regulation 18 Consultation version</p>	<p>London Borough of Tower Hamlets response. Proposed changes/new text shown in red font</p>	<p>LVRPA response and proposed further changes to the Proposed Submission Local Plan Regulation 19 - suggested wording in blue bold font. Red text indicates changes already proposed by LBTH</p>
<p>Specific reference to East India Dock Basin was sought, to be included as one of the examples of green grid projects listed under the supporting text to this policy (at para 12.14) as this is a key area of open space within the Isle of Dogs and South Poplar growth sub area located adjacent to the Tall Building Zone E.</p>	<p>A reference to East India Dock has been included under para 11.16 of the Supporting text as an example of a green grid project that will need to be delivered. It states:</p> <p>“A range of facilities, services, and infrastructure will need to be delivered. This includes:</p> <p>b. green grid projects (including East India Dock, the Lea River Park and Whitechapel Green Spine);”</p>	<p>The Authority notes and supports the change to Supporting text at para 11.16.</p>
<p>Policy DV8 Site allocations The Authority did not comment on this policy at the Regulation 18 stage. It applies to all Site Allocations.</p>	<p>Policy DV8 Site allocations A new bullet point f) has been added to this policy which states:</p> <p>“Development proposals on site allocations should meet the following requirements:</p> <p>f. provide a buffer zone of 8m to fluvial watercourses and 16m to tidal watercourses;</p>	<p>This new requirement will be supported as it will be relevant to Site Allocations that are located adjacent to the Regional Park and the River Lee/Bow Creek, including Bromley-by-Bow, Leven Street and Blackwall Trading Estate and Leamouth Road Depot.</p>

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	<p>Supporting text explains para 11.88 "Development which is in proximity to watercourses must incorporate buffer zones to support the incorporation of flood risk management into development proposals."</p>	
<p>Tall Buildings The detail contained within the Tall Building Policy PS2 was supported by the Authority. This is seeking to protect important locations and assets from potential negative impacts of taller buildings; Policy PS2 Part 4b) and Part 5 were 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 was 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.</p>	<p>The minor amendment as proposed by the Authority has been made and Policy PS2 Part 4c now states: 4. Proposed heights must take account of: c. impacts on daylight, sunlight, and overshadowing for neighbouring land and developments;</p>	<p>The Authority supports the minor amendment to Policy PS2 part 4c.</p>

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<p>The Authority supported the principle set out as part of Zone E (Leamouth) point b) 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."</p>	<p>This is retained in the Proposed Submission Local Plan (page 162) with a minor change to the wording so that Zone E point b) reads as follows: "Tall buildings in this zone should respect the primacy of the Canary Wharf zone, and step down towards the River Thames and the East India Dock Basin and ensure glimpses and views across the zone."</p>	<p>This reference to stepping down towards East India Dock Basin will be supported in the Authority's representations, but see also point below about tall buildings being set back.</p>
<p>However the Authority also stated that development should also be set back from the Park boundary and the edge of the open space at EIDB to ensure development close to the Regional Park is of an appropriate scale and design and does not block views or overwhelm the visitor. It was 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</p>	<p>No change has been made in respect of this matter.</p>	<p>This point will be restated and an objection made to the lack of policy guidance on this matter as part of the Authority's formal representations.</p> <p>It is important that the Tall Building Principles under Policy PS2 allow for the provision of sufficient scale transitions, with buildings both set back from and stepping down in height as they approach the Park edge. This principle should also apply to the waterside edge along the towpath within Tower Hamlets.</p>
<p>Open Space and Biodiversity The Authority supported Policy BO1 Green and Blue Infrastructure which seeks to maintain and enhance the provision of green infrastructure across</p>	<p>This policy and the supporting text remains the same in the Proposed Submission Local Plan Reg 19 version.</p>	<p>Support will be maintained for this Policy as part of the Authority's formal comments</p>

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<p>the borough and endorsed 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".</p> <p>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.</p>		
<p>The Council's policy for its Blue Spaces Policy BO1 Part 3 was 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.</p> <p>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 amenity of the borough's water space and amenity of surrounding residents". The Authority commented on this point and proposed that this issue of</p>	<p>The issue of cumulative impacts has not been included as policy under BO1. It is retained as part of the supporting text under para 18.27 where it states (as before)</p> <p>* An important consideration in decision making will be the cumulative impact of existing and proposed new water related uses to ensure that there is no adverse impact on the character and openness of the borough's water space</p>	<p>Whilst it is recognised that this aspect is covered in supporting text 18.27 (as before), the Authority will object to a lack of policy detail on this matter under Part 3 Blue Spaces Policy BO1.</p>

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<p>cumulative impacts and balancing different demands could be covered in policy rather than just supporting text.</p>	<p>and the amenity of surrounding residents.”.</p>	
<p>BO2 Open Spaces and the Green Grid Network The Authority noted 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 was supported, as was Part 3 of the same policy which 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 was 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.</p>	<p>This has been retained in new version.</p>	<p>Support will be maintained for this Policy as part of the Authority’s formal comments</p>
<p>Lee Valley Regional Park Reference to the Regional Park was included under the supporting text to Policy BO2 ‘Open Spaces and the Green Grid Network’ where it was acknowledged that the Regional Park forms an important part of the borough’s publicly accessible open space, and its green grid and water space network. (para 19.50).</p>	<p>These references have been carried across to the Proposed Submission Local Plan, now set out under para 18.48.</p>	<p>The additions to the supporting text under para 18.48 as set out below in red font will be supported: 18.48 The Lee Valley Regional Park 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</p>

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<p>The Authority welcomed the Council's support for the Park Development Framework where it relates to the borough and the commitment given to partnership working with the Authority and other stakeholders.</p> <p>The Authority also sought additions to the supporting text to include reference to 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. Reference was also made to the requirement to prepare a plan setting out proposals for the future management and development of the Regional Park as set out under Section 14 (1) of the Park Act.</p> <p>Further additions to the justification text were also proposed 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</p>	<p>New text has been added under the same section (para 18.48) which refers to the Lee Valley Regional Park Authority as a statutory authority and lists its responsibilities as requested.</p> <p>No reference is made to the Park Act however, or the requirements under Section 14 (1) and (2 a) and b)). Reference is included to the Park Development Framework, and support given to the proposals where they relate to the borough.</p>	<p>communities, particularly where links into this network can be enhanced and complemented with new open space delivered as part of development. The Lee Valley Regional Park Authority is a statutory authority, with responsibilities to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment, and nature conservation throughout the park. As such, the council will work together with the Lee Valley Regional Park Authority and the Environment Agency to support proposals set out in the Tower Hamlets' Local Biodiversity Action Plan and the Park Development Framework where they relate to the borough. We will also work with neighbouring authorities and relevant stakeholders to support the delivery of the Lea River Park (including the Leaway), which connects Queen Elizabeth Olympic Park and the Lee Valley Regional Park to the Royal Docks and the River Thames through a new continuous walking and cycling route along the River Lea. Further development principles and guidance are included in the Lea River Park Primer and Lea River Park Design Manual.</p>

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<p>(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.</p>	<p>Whilst it is recognised that reference to detailed sections within the Park Act may not now be relevant given the additional text included under para 18.48 above it is still considered relevant to include a reference to the Park Act as the legal framework underpinning the Regional Park and its relationship with riparian boroughs such as Tower Hamlets. This could easily be added to part of the new text inserted at 18.48 as follows, new text blue font:</p> <p>The Lee Valley Regional Park Authority is a statutory authority (created by the Lee Valley Regional Park Act 1966), with responsibilities to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment, and nature conservation throughout the park. As such, the council will work together with the Lee Valley Regional Park Authority and the Environment Agency to support proposals set out in the Tower Hamlets' Local Biodiversity Action Plan and the Park Development Framework where they relate to the borough.</p>	<p>Whilst it is recognised that reference to detailed sections within the Park Act may not now be relevant given the additional text included under para 18.48 above it is still considered relevant to include a reference to the Park Act as the legal framework underpinning the Regional Park and its relationship with riparian boroughs such as Tower Hamlets. This could easily be added to part of the new text inserted at 18.48 as follows, new text blue font:</p> <p>The Lee Valley Regional Park Authority is a statutory authority (created by the Lee Valley Regional Park Act 1966), with responsibilities to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment, and nature conservation throughout the park. As such, the council will work together with the Lee Valley Regional Park Authority and the Environment Agency to support proposals set out in the Tower Hamlets' Local Biodiversity Action Plan and the Park Development Framework where they relate to the borough.</p>

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<p>The Authority 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”</p>	<p>No addition has been made to the Glossary as suggested</p>	<p>It is important that the text as originally proposed is added to the Glossary, as this would provide an introduction to and explanation of the Park Development Framework which is referred to in supporting text to Policy BO2. This matter will be raised again in representations to the draft Submission version of the Local Plan</p>
<p>The boundary of the Regional Park should be included on the Policies Map as per the current version.</p>	<p>This has been carried across and the Regional Park boundary included on the Policies Map.</p>	<p>No further comment</p>
<p>Water Spaces The Authority endorsed the detail set out in Policy BO3 ‘Water Spaces’ and the emphasis placed on protecting the openness of water spaces. It was considered critical that development is set back from the water’s edge as required under Policy BO3 1h) to allow for maintenance of flood defences 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.</p>	<p>This Policy detail has been carried across into the Proposed Submission Local Plan</p>	<p>Support will be maintained for this Policy as part of the Authority’s formal comments.</p>
<p>Biodiversity and Net Gain Policy BO4 ‘Biodiversity and access to nature’ was welcomed and considered comprehensive in</p>	<p>This Policy has been retained within the Proposed Submission Local Plan</p>	<p>Support will be maintained for this Policy as part of the Authority’s formal comments</p>

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<p>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.</p>		
<p>BO4 Part 2 covers the requirements of BNG and the Authority endorsed the manner in which this had been set out to ensure that biodiversity enhancements are delivered even from a very low level of onsite baseline biodiversity. The policy requires 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.</p>	<p>This Policy has been retained within the Proposed Submission Local Plan.</p>	<p>Support will be maintained for this Policy as part of the Authority's formal comments.</p>
<p>Urban Greening Policy BO5 'Urban Greening' was supported by the Authority and its application to all developments irrespective of size noted. Table 11 sets out the different types of landscaping, habitat creation and building design that count as Urban Greening Factors. The Authority welcomed the inclusion of</p>	<p>This policy has been retained within the draft C Submission Local Plan.</p>	<p>No further comment</p>

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<p>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.</p>		
<p>Support was given to Policy BO6 Play and Recreation Spaces. It required that the provision for sports, recreation and play should be a fundamental part of major new developments and that it should be designed to complement adjacent areas of open or biodiverse space.</p>	<p>This policy has been retained within the draft Submission Local Plan and new policy text added encouraging developers to consider creating play spaces with a mixed range of use and with areas and features which enable those with limited accessibility to be able to enjoy play space.</p>	<p>Support will be maintained for this Policy as part of the Authority's formal comments</p>
<p>Heritage The Authority endorsed 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.</p>	<p>Policy PS6 has been retained within the Proposed Submission Local Plan and has been updated to more closely follow the established heritage tests set out in the NPPF.</p>	<p>Support will be maintained for this Policy as part of the Authority's formal comments.</p>
<p>Movement and Connectivity The Authority was supportive of the Movement and Connectivity policy set out within the Reg 18 Local Plan as it identified a clear role for development in terms of supporting and contributing to pedestrian</p>	<p>This Policy has been retained within the Proposed Submission Local Plan.</p>	<p>Support will be maintained for this Policy as part of the Authority's formal comments.</p>

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<p>and cycle networks within the borough and connections through to surrounding areas.</p>		
<p>Priority interventions to improve walking and cycling connections in the Leaside Valley area listed under justification text paras 20.17 and 20.18 were welcomed including the proposal to remodel the Learnmouth Junction to the north west of EIDB for safe cycle and pedestrian movement. Other interventions seek to improve cross-river and other waterways connections and improve connectivity for pedestrians and cyclists</p>	<p>The Proposed Submission Local Plan provides details (largely carried across from the previous Reg 18 draft Local Plan) in supporting text of various planned interventions to enhance connectivity within the Borough. Para 19.19 highlights the need for new pedestrian and cycle networks, to reduce severance of major arterial roads, improve cross-river and other waterways connections, and improve connectivity for pedestrians and cyclists.</p>	<p>The priority interventions and bridge links and improvements listed under 19.19, 19.20 and 19.22 will be supported as part of the Authority's formal comments.</p> <p>Further discussions between officers from Tower Hamlets, the Park Authority and Newham on future partnership work to deliver up new crossings of the River Lea between EIDB and Three Mills as part of the Leaway and Lee River Park projects were held earlier in the year at a meeting of the Lower Lea Infrastructure Group. The focus of this group is however to progress the long standing bridge links already identified from earlier feasibility work, namely those now listed under para 19.22.</p>
<p>The Authority's response proposed further discussion between officers from the Park Authority, Tower Hamlets and Newham on future partnership work to deliver up new crossings of the River Lea between EIDB and Three Mills as part of the Leaway and Lee River Park and the options to secure a direct pedestrian and possibly cycle connection from East India Dock Basin across Bow Creek to improve access between the Basin and Bow Creek Ecology Park.</p>	<p>Para 19.20 lists the priority interventions in the Leaside Valley area that development proposals are expected to contribute towards in order to improve walking and cycling connections and this retains the reference to remodelling the Learnmouth Junction to the north west of EIDB for safe cycle and pedestrian movement.</p>	<p>The Lower Lea Valley Connections and Movement Strategy which forms part of the evidence base to the Submission version Local Plan identifies and assesses a range of improvement projects to improve connectivity and access for series of neighbourhood areas, one of which is East India Dock Basin.</p>
	<p>Further interventions that will be supported by the Council are listed</p>	

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	<p>under para 19.22 including working in partnership with the London Borough of Newham and developers on relevant sites, to deliver up to five new crossings of the River Lea, and one additional bridge entirely within Tower Hamlets. It states:</p> <p>"Where relevant, development proposals on the Tower Hamlets side of the river will be expected to safeguard land to contribute towards the delivery of:</p> <ul style="list-style-type: none"> • Lochnagar Bridge, from Lochnagar Street to Canning Town Riverside • Poplar Reach Bridge, from the north of the Leven Road site to Cody Dock • Mayer Parry Bridge, from the south of the Leven Road site to Canning Town Riverside • Leamouth Crossing, from Orchard Place to the Limmo Peninsula • Trinity Buoy Wharf to Thames Wharf Bridge 	<p>Whilst these identify a series of interventions to improve access around, and between Bow Creek and EIDB these are all at grade rather than proposing additional bridge connections. The proposed bridge between Good Luck Hope adjacent to EIDB would cross the river onto the Limmo Peninsula on the eastern side.</p> <p>Officers will however continue to engage with LBTH and Newham on these matters and projects to deliver improved connections between sites within the Regional Park and adjacent communities within both Boroughs.</p>

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	<ul style="list-style-type: none"> • A13 walkway, from the Blackwall Trading Estate, under the A13, to the Leamouth Depot site 	
<p>Site Allocations Leaside Sub Area The vision and objectives for the Leaside Sub Area were welcomed by the Authority, in particular 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 was sought to the Regional Park under this part of the vision.</p>	<p>The reference to the Lee Valley Regional Park has been included under the Vision statement for Leaside Sub Area.</p>	<p>Support the following addition to the Leaside sub area Vision as follows:</p> <p>"24.5 The development of the Lea River Park (including the Leaway) 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, including the Lee Valley Regional Park."</p>
<p>Leaside Sub Area continued</p>	<p>Additional text has been added to the objectives for the Leaside sub area. Objectives a) and b) remain as previously stated and should be supported. Objective f) is also relevant in terms of development proposals on site allocations adjacent to the Park and how they might connect into the Park area. The additional text added to this objective should be supported – see text in red font below</p>	<p>The Authority will support objectives a) and b) as follows</p> <ol style="list-style-type: none"> Improve strategic connections to overcome the physical barriers to movement created by the A12, A13 and the waterways Deliver the Lea River Park (including the Leaway) to provide a network of interconnected water and open spaces,

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	<p>f) Optimise former industrial /employment land and protect designated industrial areas whilst sensitively integrating industrial activities into their site context and enhancing the public realm and pedestrian and cycle connectivity</p>	<p>green walking and cycling routes and improve access to and along the River Lea and the additional wording added to objective f) as shown in red font below:</p> <p>Optimise former industrial/employment land and protect designated industrial areas whilst sensitively integrating industrial activities into their site context and enhancing the public realm and pedestrian and cycle connectivity</p>
<p>Site allocations 3.4 Bromley-by-Bow</p>	<p>Additions have been made to the site allocation text</p> <p>The principles for 'Routes and Streets' include the need for improved linkages across the A12 and now also reference the need to improve safety in the underpasses beneath the A12 as well as links to the east across the River Lea.</p> <p>The requirement for an improved junction to provide vehicular and pedestrian access from the site to and across the A12 to improve access to the wider Bow area and local tube station</p>	<p>The Authority supports the additions to the site allocation text under Routes and Streets in terms of measures to improve safety in the underpass beneath the A12 and the need to include "at-grade pedestrian and cycle crossings of the A12. These measures would assist in improving safe access to and from the Regional Park at Three Mills.</p>

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	<p>now also specifies that this should include "at-grade pedestrian and cycle crossings and the potential to facilitate the 'Bow Vision' bus route, connecting through Bromley-by-Bow to Sugar House Island via a potential new bridge"</p>	
<p>Three Mills Island sits opposite and forms an important heritage site and visitor attraction within the Regional Park and the Authority requested that this should be identified as a planning designation on the site pro-forma for Bromley-by-Bow. Three Mills Green provides valuable open recreational space and is also used for music and cultural events. This should also be highlighted in the site allocation description.</p> <p>The Authority supported 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. This additional public access along the waterfront should also however 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.</p>	<p>No changes proposed</p>	<p>An objection will be made to the lack of any specific reference to the Regional Park under the Bromley-by-Bow site allocation - in particular the Three Mills Island is an important 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 used for music and cultural events. This should also be highlighted in the site allocation description.</p> <p>Requirements for additional public access along the waterfront should also 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.</p>

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<p>3.2 Leven Road Although this site allocation is not adjacent to the Park boundary the Authority noted and welcomed 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.</p>	<p>Site allocation detail includes principles about development stepping back from the River Lea and improving walking and cycling connections as previously stated in the Reg 18 version of the Local Plan.</p>	<p>Support will be maintained for the principles which require development to step back from the waterside as part of the Authority's formal comments</p>
<p>3.5 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 supported 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 welcomed the principles that seek to ensure development improves walking and cycling connections particularly along the river and</p>	<p>The principles supported at the Reg 18 stage have been included in the Reg 19 Local Plan. In terms of the connector bridge under the A13 there has been a slight amendment made to the text so that it now states "Land should be secured to provide a connector bridge that runs underneath the A13 to connect both sides of the site, to complete the pathway up the River Lea, and to allow pedestrians and cyclists to travel north and south without needing to cross the busy A13..."</p>	<p>The Authority maintains its support for the principle included in the Site Allocation requiring development to incorporate riverside public open space with elements of biodiversity that complement the adjacent Bow Creek Ecology Park. The Authority will also support the principles that seek to ensure development improves walking and cycling connections along the</p>

<p>Summary of LVRPA Comments to the London Borough of Tower Hamlets Draft New Local Plan Regulation 18 Consultation version</p>	<p>London Borough of Tower Hamlets response. Proposed changes/new text shown in red font</p>	<p>LVRPA response and proposed further changes to the Proposed Submission Local Plan Regulation 19 - suggested wording in blue bold font. Red text indicates changes already proposed by LBTH</p>
<p>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.</p>		<p>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.</p>
<p>The Authority also commented that 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.</p>	<p>No change made to the Site Allocation in respect of the height strategy</p>	<p>The comments made regarding the location of tall buildings on the site will be restated as an objection. The height strategy referred to in the Site Allocation is confusing and the Authority's concern is that tall buildings should be set well back from the waterside edge of the site, i.e. the River Lee/Bow Creek, particularly in the south where the site sits directly opposite Bow Creek Ecology Park. Space should be provided for habitat creation adjacent to the waterside set within informal areas of open space to buffer and complement the Ecology Park opposite. This should be in addition to the provision of more formal public amenity space required to meet the needs of new residents.</p>