Appendix 5

London Borough of Tower Hamlets

Neighbourhood Planning
Public Consultation Summary Reports

Application to establish a Neighbourhood Planning Forum and Neighbourhood Planning Area was submitted by the following local groups:

- **Spitalfields Neighbourhood Planning Forum**
- **Limehouse Community Forum**
- **Isle of Dogs Neighbourhood Planning Forum**

TOWER HAMLETS

1) Role of this document

This document provides a summary on the level of representation, and the matters discussed within representations, during the formal public consultation period for the applications to establish a Neighbourhood Planning Forum and Neighbourhood Planning Area made by:

- Spitalfields Neighbourhood Planning Forum;
- Limehouse Community Forum and;
- Isle of Dogs Neighbourhood Planning Forum.

The report takes account of relevant planning matters in representations submitted to the London Borough of Tower Hamlets.

This paper has been prepared by the London Borough of Tower Hamlets for public information and to inform the Council's decision making process. It is not intended to address any of the issues raised during the consultation period.

2) Approach to categorising representations made

During the public consultation period, the public are able to make representations on the contents of the area and forum applications submitted to the Council. Typically, representations are made by local residents, local Councillors, landowners, businesses, interests groups, statutory consultees and neighbouring Local Authorities. Representations were not made by all parties directly consulted.

This document presents representations in no particular order. Representation figures calculate submitted responses and as such do not limit representations to one per household or one per business. The following categories have been used to categorise representations:

Support	Have stated explicit support, or support has been inferred from the contents of the representation
Object	Have stated explicit objection, or objection has been inferred from the contents of the representation
Neutral	Have offered comments but not determined if they object or support the application
Petition	A written objection signed by multiple signatories
No comment	Where no comment has been made and no position on the matter can be inferred
Concerned	Do not state they object but highlight areas of concern

The following summaries have been derived from an analysis of the consultation responses. Please note, representations did not always specify support or objection to the area and Forum. The summary of responses paraphrases comments made by representors and, to avoid repetition, makes reference to the same matter once only.

When analysing the representations, regard is given to legislative requirements related to the Forum and Area proposals.

3) Spitalfields Neighbourhood Planning Forum: Summary of public consultation responses.

3.1 Consultation activities undertaken by the Council

The formal public consultation period ran from 5 January to 16 February 2015.

Consultation activities undertaken by the Council were carried out in accordance with Neighbourhood Planning Regulations. Activities undertaken were as follows:

- Provision of consultation information and application material on the Council's website (www.towerhamlets.gov.uk).
- Provision of consultation information and application material to the Idea Store Whitechapel and LBTH Market Services for inspection by interested parties.
- Provision of information to elected Councillors in the relevant areas.
- Publication of a Public Notice in East End Life.

These activities also followed the principles of the guidance for the production of policy documents as set out in the Council's Statement of Community Involvement (SCI).

3.2 Summary of responses related to the Forum based application

Number of representations received

Support	Objection	Neutral	No comment	Petition	Concerned	Total
23	5*	7	1	1	0	36**

*5 objection letters were submitted individually. 1 of the objection letters includes the petition and 603 signed proforma letters.
**This number does not include the petition. The petition was signed by 654 separate signatories in objection to the Forum and of the 603 signed proforma letters. 307 were from businesses including market stall holders and 32 were from residents.

Comments made by statutory bodies and neighbouring authorities

No comments were made on the purpose, membership or constitution of the proposed Forum.

Summary of matters raised in support:

- Forum members are found to be agreeable.
- The Forum has a representative framework that is diverse and committed to "hearing each other".
- The Forum is democratic and aims to provide continuity and commitment to One Tower Hamlets.
- The Area and Forum would give residents a stronger voice on planning issues.
- "We have already benefited from engagement with such a diverse group of individual, community groups and businesses".
- "Designation will help support, protect and encourage sensitive and appropriate social, economic, environmental and property growth and enrichment of the area".

- The range of members will allow for a strategic and spatial vision to be achieved in the proposed Area.
- The constitution was found to be agreeable.

Matters raised by objectors:

- A Forum based on the proposed Area would not be able to effectively or efficiently deliver a neighbourhood plan.
- There was a lack of inclusiveness on the part of the Proposed Forum's Interim Steering Group in developing the proposed Area and consultation was incomplete and unsatisfactory.
- There was a failure in governance on the part of the proposed Forum's Interim Steering Group in relation to membership being conditioned to acceptance of the proposed Area.
- Failure to comply with legislation with regards to consultation and membership.
- The Forum's consultation was incomplete and not comprehensive during the preparation of the proposed Area with consultation periods not taking into consideration Ramadan or the summer holiday season.

3.3 Summary of comments made on made on the Proposed Area

Number of representations received

Support	Objection	Neutral	No comment	Petition	Concerned	Total
23	5*	7	1	2	0	36**

*5 objection letters were submitted individually. 1 of the 5 objection letters included the 2 petitions and 603 signed proforma letters. Of the 603 signed proforma letters 307 were from businesses including market stall holders and 32 were from residents.
** This number does not include the petitions. The first petition was signed by 654 separate signatories in objection to the area. The second petition was signed by 918 separate signatories in objection to the area being designated and identifying an alternative area.

Comments made by statutory bodies and neighbouring authorities

- Natural England offers advice related to protected landscapes, protected species, local wildlife sites, best most versatile agricultural land and opportunities for enhancing the natural environment.
- Historic England (English Heritage at the time of submission) note that the proposed boundary does not encompass the whole of Brick Lane & Fournier Street Conservation Area or a small part of the Wentworth Street Conservation Area. It is normally advocated that the boundaries should respect Conservation Area boundaries.
- Marine Management Organisation has no comments.
- The Environment Agency outlined that the area is not identified as being in an area of Flood Risk.
- The Coal Authority has no comments.
- The City of London highlights the importance of strong links between the City Fringe and City itself. Characteristics of the city are now found in the City Fringe.
- Transport for London (TFL) state the area includes Commercial Street and Bishopsgate which form part of the Transport for London Road Network (TLRN). It is also stated that TFL operates numerous bus services in the area and has London Overground, London

Underground and Cycle Hire infrastructure in the area. The proposed route of Crossrail runs through the area.

Summary of matters raised in support:

- The proposed Area is agreeable and representative of the heart of Spitalfields.
- The proposed boundaries are commensurate with other boundaries adopted by the Council ie. Responsible Drinking Zones.
- The Area is manageable in terms of policy making.
- The boundaries should include Old Truman Brewery.
- Keen to be included within Area boundary (*this relates to one community based organisation*).

Summary of matters raised in objection:

- The Old Truman Brewery Site should not be included in the area for a number of reasons as follows: it is distinct in land use, character, physical form from the surrounding area and its inclusion is therefore inconsistent with the proposed Area. The site is physically contained and physically separate from the surrounding area. It is a strategic site, akin to the Bishopsgate Goodsyard site, with a wide sphere of influence beyond the local or neighbourhood level.
- The proposed Area is too large and does not form a coherent or consistent neighbourhood.
- Character areas within the proposed Area were identified which highlight distinctive characteristics and the incoherence of the area. The character areas include a specialised restaurant area, large floor plate contemporary architecture, fine grain street patterns and areas attracting international tourism.
- An alternative Area, to the south east of the proposed area is proposed. It is smaller in scale and largely residential.
- A Neighbourhood Development Plan for the area is not deliverable.
- More planning policy could hinder growth. There is already a detailed and adopted planning framework for the area.
- There will be unknown implications for the Old Truman Brewery Site which represents 9.1% of the application site.
- A neighbourhood plan for the proposed Area is not deliverable and would result in an inefficient use of resources including LBTH resources.

4) Limehouse Neighbourhood Planning Forum: Summary of public consultation responses

4.1 Consultation activities undertaken by the Council

The formal public consultation period ran from 17 June to 30 July 2015.

Consultation activities undertaken by the Council were carried out in accordance with Neighbourhood Planning Regulations. Activities undertaken were as follows:

- Provision of consultation information and application material on the Council's website (www.towerhamlets.gov.uk).
- Provision of consultation information and application material to the Shadwell Centre, Idea Store for inspection by interested parties.

- Provision of information to elected Councillors in the relevant areas.
- Publication of a Public Notice in East End Life.

These activities also followed the principles of the guidance for the production of policy documents as set out in the Council's Statement of Community Involvement (SCI).

4.2 Summary of responses related to the Forum based application

Number of representations received

Support	Objection	Neutral	No comment	Petition	Concerned	Total
1	0	5	1	0	0	7

Comments made by statutory bodies and neighbouring boroughs:

No comments were made on the purpose, membership or constitution of the proposed Forum.

Summary of matters raised in support:

- A statement of support related to the Forum was made with no reasons for this support identified.

Summary of matters raised in objection:

- The proposed Forum are unelected.
- Limehouse Community Forum have not widely canvassed opinion of the matter of an application at Branch Road.
- Limehouse Community Forum feel like a local pressure group.

4.3 Summary of responses related to the Area based application

Number of representations received

Support	Objection	Neutral	No comment	Petition	Concerned	Total
1	0	5	1	0	0	7

Comments made by statutory bodies and neighbouring boroughs

- Natural England offers advice related to protected landscapes, protected species, local wildlife sites, best most versatile agricultural land and opportunities for enhancing the natural environment.
- Historic England noted that a number of listed buildings and conservation areas are included in the proposed area. Historic England suggests encompassing the western extension of the Narrow Street Conservation Area and the areas of St. Anne's Church Conservation Area which falls outside of the proposed boundary. York Square appears more problematic and as such this should be discussed with the LBTH Conservation Team.
- Marine Management Organisation has no comments.
- Transport for London (TFL) recommended that the northern boundary sits on the southern side of the A13 to exclude the road from the plan. This was said to be because

Neighbourhood Plan policies should be related to the development and use of land, so the scope of the plan will be limited to influence changes to the A13.
- City of London had no comments.

Summary of matters raised in support:

- No comments of support were specifically made to the area, but it was noted that the proposed boundary overlaps with the Isle of Dogs Neighbourhood Planning Boundary to the east.

Summary of matters raised in objection:

- No comments of support were specifically made on the area.

5) Isle of Dogs Neighbourhood Planning Forum: Summary of public consultation responses

5.1 Consultation activities undertaken by the Council

The formal public consultation period ran from 5 January to 16 February 2015
Consultation activities undertaken by the Council were carried out in accordance with Neighbourhood Planning Regulations. Activities undertaken were as follows:

- Provision of consultation information and application material on the Council's website (www.towerhamlets.gov.uk).
- Provision of consultation information and application material to the Idea Store Canary Wharf and Cubitt Town Library for inspection by interested parties.
- Provision of information to elected Councillors in the relevant areas.
- Publication of a Public Notice in East End Life.

These activities also followed the principles of the guidance for the production of policy documents as set out in the Council's Statement of Community Involvement (SCI).

5.2 Summary of responses related to the Forum based application

Number of representations received

Support	Objection	Neutral	No comment	Petition	Concerned	Total
18	7	8	0	0	2	35

Comments made by statutory bodies and neighbouring boroughs:

- No comments were made on the purpose, membership or constitution of the proposed Forum.

Summary of matters raised in support:

- Strong support for the proposed Forum as they are necessary as a means to represent views of residents related to the massive pressures the volume of development is creating.

- The Forum will be able to act in the best interest of residents, consult with them and give a more joined up approach to planning in the Isle of Dogs.
- The Forum will work well with the Council.
- The proposed Forum is running in a formal and responsible manner and trying to include a wide spectrum of the community affected.
- A constructive and valuable contribution will be made by the Forum
- Supportive of the proposed Forum's objectives for social, economic and environmental wellbeing and its ambition to involve the local community in the planning process.
- The purpose and aims of the proposed Forum are important.
- The proposed Forum and Area will enable local services like schools to be considered alongside bare numbers of habitable rooms, social housing provision and S106 contributions.
- Open membership, as defined in the Planning Practice Guidance, must allow anyone who has an interest in the development of the area to be involved in the plan preparation and as such landowners and representatives should be included.
- Agree with the proposed constitution.

Summary of matters raised in objection:

- The proposed Neighbourhood Forum does not include sufficient representation of key stakeholders, landowners and developers who have a serious interest in emerging planning policy and designated strategic sites.
- The proposed constitution does not allow for landowners to become full members of the forum, or provide them with the ability to vote, which we strongly object to.
- Object to the make-up of representatives of the proposed Forum.

Summary of matters raised as concerns:

- The diversity of the different neighbourhoods on the Isle of Dogs highlights the potential issues with seeking to develop a Neighbourhood Plan for inhabitants who are likely to have different aspirations, values and views.
- The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) promotes a growth agenda to foster economic sustainability and meet the needs of a growing population. Consistent with the national agenda, the London Plan advocates this agenda, identifies the Isle of Dogs as an Opportunity Area where substantial numbers of new jobs and homes can be accommodated and identifies a housing delivery target for Tower Hamlets. A forthcoming Neighbourhood Plan must be prepared in accordance with this.
- The OAPF is the proper Forum for strategic planning issues and providing a comprehensive approach to infrastructure across the island. A Neighbourhood Plan is not the appropriate level to co-ordinate development of strategic sites.
- The purpose of the Forum would be better achieved through having a number of areas.
- Open membership, as defined in the Planning Practice Guidance, must allow anyone who has an interest in the development of the area to be involved in the plan preparation and as such landowners and representatives should be included.
- It is requested that the constitution is amended to allow landowners and representatives to be included.

5.3 Summary of responses related to the Area based application

Number of representations received

Support	Objection	Neutral	No comment	Petition	Concerned	Total
2	4	7	16	0	6	35

Comments made by statutory bodies and neighbouring boroughs

- Natural England offers advice related to protected landscapes, protected species, local wildlife sites, best most versatile agricultural land and opportunities for enhancing the natural environment.
- Historic England (English Heritage at the time of submission) noted the proposed Area includes a number of designated heritage assets including four Conservation Areas, 52 listed buildings/structures, of which one is Grade II* and three are Grade I, a Grade II Registered Historic Park and Garden and an Archaeological Priority Area. The Registered Historic Park and Garden of Island Gardens is also covered by the Greenwich Maritime World Heritage Site.
- The Environment Agency identified that the area is within Flood Zone 3. Sources of flood risk include tidal from the Thames upriver of the Thames Barrier, tidal and fluvial from the River Lea, and pluvial and urban drainage between the docks and defences.
- Marine Management Organisation has no comments.
- The Coal Authority has no comments.
- City of London outline that any future proposals for Billingsgate must consider the Tower Hamlets Managing Development Document Site Allocation for Billingsgate.
- Transport for London (TFL) noted that the Isle of Dogs is identified as an Opportunity Area by the London Plan and as such is seen as capable of accommodating substantial numbers of new jobs and homes.

Summary of matters raised in support:

- Two statements of support relating to the area were made with no reasons for this support identified.

Summary of matters raised in objection:

- Inappropriate to include strategic sites and the experience gathered from the High court Judgement in a case by Daws Hill Neighbourhood Forum Area vs Wycombe District Council.
- The strategic development site, Westferry Printworks, is excluded from the Area.

Summary of matters raised as concerns:

- Concerned the area is too large and diverse to embrace the true principles of neighbourhood planning and would make consensus almost impossible. The proposed area includes numerous housing estates, five community centres, four GP's, six primary schools, one secondary school, five dentists and three principal open spaces.
- Experience of the operation of different residential estates is that they function as different 'neighbourhoods'.
- Guidance in the Planning Practice Guidance reveals that Neighbourhood Planning is intended to relate to much smaller areas.

- There are key physical differences between the densely developed area immediately adjacent to Canary Wharf and the less densely developed housing in more traditional streets to the south of the Island.
- The Asda Crossharbour site (*Site Allocation 19: Crossharbour Town Centre of the Managing Development Document)* is of significance beyond the Isle of Dogs area and should be excluded from the Neighbourhood Planning Area.
- The inclusion of the Wood Wharf site (*Site Allocation 16 Wood Wharf of the Managing Development Document*) is seen as unnecessary as the planning context for Wood Wharf is well established. It should be excluded from the Area.
- All Canary Wharf Group interests, including Wood Wharf and North Quay Place should be excluded from the Area.